

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Northland Ready Mix Concrete  
**PROPOSAL NAME:** Concrete Batch Plant  
**CLASS OF DEVELOPMENT:** 1  
**TYPE OF DEVELOPMENT:** Manufacturing Plant  
**CLIENT FILE NO.:** 5330.00

### **OVERVIEW:**

On March 18, 2008, Manitoba Conservation received a Proposal for the operation of a concrete batch plant at 100 St. Paul Boulevard in the RM of West St. Paul. Additional information was received on May 6, 2008. The facility will produce concrete for construction and will operate Monday to Saturday between the hours of 7:00 am and 8:00 pm. There are particulate matter and noise emissions associated with the production of concrete.

The Department, on April 1, 2008, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station) Main Floor, Winnipeg; the Millennium Public Library, 4<sup>th</sup> Floor, 251 Donald Street, Winnipeg; the Manitoba Eco-Network, 3<sup>rd</sup> Floor, 303 Portage Ave., Winnipeg; and the Selkirk-St. Andrews Regional Library, 303 Main St., Selkirk. Copies of the Proposal were also provided to the Technical Advisory Committee (TAC) members. A notice of the Environment Act proposal was also placed in the Winnipeg Free Press on April 5, 2008. The newspaper and TAC notifications invited responses until May 1, 2008.

### **COMMENTS FROM THE PUBLIC:**

No public responses were received.

#### **Disposition:**

No action needed.

### **COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:**

#### **Canadian Environmental Assessment Agency**

Advised that the application of the *Canadian Environmental Assessment Act* will not be required.

#### **Disposition:**

No action needed.

#### **Environment Canada**

The following is a summary of comments provided:

- Portable or mobile concrete plants can emit significant amounts of fine and coarse particulates and gaseous emissions. Particulate matter less than 2.5 microns in size (PM<sub>2.5</sub>) has been declared toxic under CEPA because of human health and environmental concerns.
- The proponent listed the chemicals used in its operation including Glenium 7101 that according to the proponent MSDS contains materials not included in the Canadian Domestic Substances List (DSL). The proponent however, did not include or give the CAS number of the material component of Glenium 7101 that is not included in the Canadian DSL.
  - *The proponent responded by providing an updated MSDS, providing verification that the substance of concern is on the Canadian DSL.*
- The concrete manufacturing process releases the following substances declared toxic under the Canadian Environmental Protection Act, 1999 (CEPA): PM10, sulphur oxides, nitrogen oxides, volatile organic compounds, and ground level ozone.
- EC also recommend that the proponent be required to implement the Best Available Techniques (BAT) as outlined in Section 4.2 of the “*Multi-pollutant Emission Reduction Analysis Foundation (MERAf) for the Hot-Mix Asphalt Sector (September 2002)*” This report is available at [www.ccme.ca/assets/pdf/hot\\_mix\\_asphalt\\_final\\_meraf\\_e.pdf](http://www.ccme.ca/assets/pdf/hot_mix_asphalt_final_meraf_e.pdf)
- The proponent should also be aware that portable concrete batch plants are required to report under National Pollutant Release Inventory.

### Disposition

Clauses 11 to 23 of the Draft Environment Act Licence address concerns related to air emissions.

### Manitoba Water Stewardship

The following is a summary of comments provided

- *The Water Rights Act* indicates that no person shall control water or construct, establish or maintain any “water control works” unless he or she holds a valid license to do so. “Water control works” are defined as any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert borehole or contrivance for carrying or conducting water, that temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, OR changes or may change the location or direction of flow of water, including but not limited to water in a water body, by any means, including drainage. If the proposal in question advocates any of these activities, application for a Water Rights License to Construct Water Control Works is required.

- It is recommended that an *Environment Act* Licence includes requirements, prior to the discharge of spills, process water, and/or truck wash water, to obtain approval from the Water Quality Management Section for the following:
  - Prior to discharging potentially contaminated water off-site and/or to the environment, the proponent conducts toxicological testing of the effluent and provides an estimate of the discharge volume to the Water Quality Management Section.
    - Further, the Material Safety Data Sheets, submitted with the Proposal, indicate there is no ecotoxicological data for chemicals used, toxicological data should be obtained to ensure there is not an issue for receiving surface waters with off-site discharge.
  - Prior to discharging potentially contaminated water off-site and/or to the environment, the location of discharge is provided to the Water Quality Management Section.
- It is recommended that an *Environment Act* Licence include a requirement for the development and implementation of an Emergency Response Plan, including the accidental release of substances (chemicals).

#### Disposition

Clause 26 of the draft Environment Act Licence prohibits the discharge of wastewater and clause 27 requires an emergency response plan.

#### **Manitoba Culture, Heritage, Tourism and Sport – Historical Resources Branch**

No concerns.

#### Disposition

No action needed.

#### **Manitoba Intergovernmental Affairs – Community Planning Services**

The following comments were provided:

- The area affected by this proposal is designated “Rural Industrial” under the Selkirk and District Planning Area Development Plan and zoned “M2” Heavy Industrial Zone under the RM of West St. Paul Zoning By-law. “*Bricks and/or concrete plants incl. brick or concrete products*” are listed conditional use in this

zone and it appears as though the applicant has already obtained conditional use approval. There are no site requirements associated with this land use in the zoning by-law.

- Community Planning Services does not identify any concerns with this proposal.

#### Disposition

No action needed.

#### **Manitoba Infrastructure and Transportation**

The following is a summary of comments provided:

- MIT has indicated that it may be necessary to close some local municipal and service road connections to PTH 101 in the future, in which case traffic would be redirected to selected intersection on PTH 101.
- Due to changes in land use along PTH 101, it has been necessary to remove/close access connections and median openings to maintain a high level of safety and traffic operations along this highway, and it may be necessary to remove more/close more connections and median openings in the future.
- Any new, modified or relocated access to PTH 101 and/or PTH 8 requires a permit from the Highway Traffic Board. A permit is also required to change the use of the land or building, or to place/construct any structures (including alteration of existing buildings) within 76.2 metres from the edge of the highway right-of-way. A permit is also required from MIT for any construction planting within 15.2 metres from the edge of the right-of-way of the highway.
- Preliminary traffic projections are requested from the proponent.

#### Disposition

The proponent has indicated that they will comply with MIT's requests.

#### **Manitoba Conservation – Sustainable Resource & Policy Management Branch**

No concerns.

#### Disposition:

No action needed.

#### **Manitoba Conservation – Parks and Natural Areas Branch**

No concerns.

Disposition:

No action needed.

**Manitoba Conservation – Environment Section**

The following comment was provided

- Assuming that the flyash is generated in the combustion of coal, the potential concern relates to the concentration of heavy metals in the flyash. We believe that there may be limits on the percentage of flyash that is used in the concrete mixture, but we are not certain if there are limits on the concentrations of heavy metals. If such limits exist, we recommend that they be included in the EA Licence.

Disposition:

The proponent provided chemical analysis of their flyash. No further action required.

**PUBLIC HEARING:**

A public hearing is not recommended.

**RECOMMENDATION:**

The Proponent should be issued a Licence for the assembly and operation of a concrete batch plant in accordance with the specifications, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Central Region of Manitoba Conservation.

A draft environment act licence is attached for the Director's consideration.

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May 28, 2008

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