

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Mix All Concrete Ltd.
PROPOSAL NAME: Batch Concrete Facility
CLASS OF DEVELOPMENT: Class 1
TYPE OF DEVELOPMENT: Permanent Concrete Batch Plant
CLIENT FILE NO.: 5138.00

OVERVIEW:

On September 22, 2005, the Department received a Proposal from Mix All Concrete Ltd. for the development and continued operation of a permanent concrete batch plant facility.

On September 30, 2005 the Department placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), at the St James-Assiniboia Public Library, at the South Central Regional Library in Morden and at the Manitoba Eco-Network. As well, copies of the Proposal were provided to the Technical Advisory Committee (TAC) members. The Department placed a public notification of the Proposal in the Winkler Times on October 7, 2005. The newspaper and TAC notification invited responses until November 8, 2005.

COMMENTS FROM THE PUBLIC:

No comments or concerns were received from the public

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Historic Resources - No concerns.

Transportation and Government Services - No concerns.

Intergovernmental Affairs – Had the following comment:

Community Planning is satisfied that the established use on the subject site generally conforms to the MSTW Development Plan and Zoning By-Laws.

Conservation – Had the following comments:

- a) In section ix), page 3 of the proposal it states “pollution in the designated wash bays are being controlled by keeping the water used to wash the mixer drums in the contained area.” Where is the contained area? What happens to water that enters the contained area?

The proponent replied that:

The wash area is located on the south west corner of the lot. The contained water dissipates into the ground at present. The 2006 objective is to capture the water after the residue is captured in a sand filter and reuse the water.”

- b) On page 2 you state that you have obtained certification from the Manitoba Ready Mix Concrete Association. What does this certification mean? Does it mean that you will comply with the various management practices that are proposed for water management, air quality management, noise management etc. in the document entitled "Environmental Management Practices for Ready Mixed Concrete Operations in Canada"?

The proponent replied that:

To obtain certification from the Manitoba Ready Mix Concrete Association you must adhere to their standards. They send a technician and complete a full inspection of the plant to make sure we fall within the guidelines. If we do not comply with their standards we lose our certification, which means we cannot sell any concrete. Our absolute objective is to be in good standings with all Environmental concerns and to work to the best of our abilities to comply with all departments.

Disposition: The Environment Act licence addresses the relevant applicable terms.

Industry, Economic Development & Mines - No concerns.

Health – Do not anticipate any negative effects.

Water Stewardship – Had the following comments:

The development is located on top of the western edge of the Winkler aquifer. Typically this area of the aquifer is overlain by clay and till deposits, however shallow surficial sand deposits may also exist. The site specific soil conditions at Mix All Concrete Ltd. are unknown. The Proposal states that "Pollution in the designated wash bays are being controlled by keeping the water used to wash the mixer drums in the contained area." The proponent does not provide any detail on the design or construction of the containment area. This area should be designed and constructed to prevent the contamination of soil, surface water and groundwater on and off the site of development. In addition, there should be a contingency plan for containment and clean-up should a spill occur to prevent any harmful residues from entering surface or groundwater.

Disposition: The Environment Act licence addresses the relevant applicable terms.

Canadian Environmental Assessment Agency

The application of the Canadian Environmental Assessment Act with respect to this proposal will not be required. The Federal Department of Health did however have the following comments:

- a) The proposal should describe the quantity and quality of waters that will not be reused and may be released to the environment. Washout waters can be quite alkaline and contain heavy metals or other undesirable constituents from the components and admixtures.

The proponent replied that:

The quantity of water is approximately 60 – 80 gallons per wash at the end of a day for each truck. This is usually a rinse with very little residue. Most times the leftover concrete is left on the site of the pour and washout. To date we have mixed approximately 1800 yards in 2005. The rinse water is captured in a temporary pond.

As the water disappears into the ground the residue remains to be used as site fill or removed to a landfill. Example of a 60 yard pour – 3 trucks will use a total of 180 gallons to 240 gallons of rinse water at the end of the day. The Manitoba Ready Mix Concrete Association has proposed available techniques for treating rinse water. Our company is young and new but our objective in 2006 is to incorporate one of their suggestions of filtration and also to capture the water to be re-used.

- b) Could the release of this water affect local ground waters or surface water resources (e.g. drinking, livestock or irrigation waters) or soils?

The proponent replied that:

Our temporary pond has a fabric laid out approximately 12" – 16" below ground level. The water gradually dissipates into the ground. The residue is then scraped up for disposal. The material safety data sheets we submitted with our proposal identify the possible residues.

- c) Could the adjacent nursery operations or other nearby receptors be affected by these wastewater releases?

The proponent replied that:

The quantity of rinse water is significantly low to affect a nursery 1/8 of a mile away. The cornfield that is right beside the pond was not affected. There is also a buffer of trees on the east and west sides of the plant's location.

Disposition: The Environment Act licence addresses the relevant applicable terms.

Canadian Environmental Assessment Agency (cont.)

The Federal Department of Health had these additional comments which are not usually covered in Environment Act licences, since they are Workplace Safety and Health issues:

The rate of occupational related injury and illness in the construction sector and more specifically the ready mix concrete business has been reported to be very high (Statistics Canada 1999, Centre for Disease Control, 2001). What mitigation measures are planned by the proponent to mitigate common health and safety concerns (e.g. falls, hearing damage, skin sensitization, respiratory effects, weather effects)?

COMMENTS ON DRAFT LICENCE

Conservation had the following comments:

Respecting Air Emissions

The proponent did not completely tell the truth about the neighborhood.

On the same section of land, Parcels A, B, D (times 2), G, H, J, L, I, and the F Heide property are all residential properties not associated with the development

A regional Hospital is located on the adjacent property directly west of Morden Nurseries, (approximate distance ½ mile) There is also an EA licensed Concrete batching plant on parcel K of the identified section. Within a one mile radius of the plant there would be approximately 20 residential properties contrary to what is reported in section iii of the proposal.

This section refers to noise nuisance but does not require the operator to conduct monitoring if complaints are received or an EO feels it is required. The License requires it for particulate matter in Clause 15. I would recommend that noise levels be addressed in a similar manner.

This may be a mute point however as the operation fronts onto a major twinned highway (NO. 14) thus traffic noise is a constant in this area.

Respecting Wastewater

Does the Environmental Management Practices for Ready Mixed Concrete Operation in Canada referred to in Clause 19 state the protection barriers that must be in place i.e. compacted clay or equivalent? If not I would suggest that Clause 20 be amended to stipulate the minimum standard acceptable and testing methods required to prove this barrier is in place.

Disposition: The Environment Act licence addresses the relevant applicable terms. Clause 15 can be used by the Director to require noise monitoring. Clause 20 requires the use of an impermeable membrane for the wastewater containment structure.

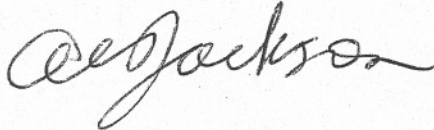
PUBLIC HEARING:

A public hearing is not required.

RECOMMENDATION:

The Applicant should be issued a Licence, in accordance with the attached draft, to operate the permanent concrete batch plant. Enforcement of the Licence should be assigned to the Red River Region.

PREPARED BY:

A handwritten signature in black ink, appearing to read 'Adrian Jackson', written in a cursive style.

Adrian Jackson, P. Eng.
Environmental Engineer
Municipal, Industrial and Hazardous Waste Section
March 2, 2006
Telephone: (204) 945-7108
Fax: (204) 945-5229
E-mail Address: ajackson@gov.mb.ca