

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Boeing Canada Technology
PROPOSAL NAME: Boeing Canada Technology
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Manufacturing Plant
CLIENT FILE NO.: 5346.00

OVERVIEW:

On May 20, 2008, Manitoba Conservation received a Proposal for the construction and operation of a spray paint operation facility located at 1345 Redwood Avenue in Winnipeg, Manitoba. The facility will use a paint booth operation to paint 747, 767, and 777 component assemblies. The exhaust air from the paint booth will be filtered twice before release to atmosphere.

The Department, on June 2, 2008, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Millennium Public Library, and the Manitoba Eco-Network. 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 June 7, 2008. The newspaper and TAC notifications invited responses until July 4, 2008.

COMMENTS FROM THE PUBLIC:

No public comments were received.

Disposition:

No action needed.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Canadian Environmental Assessment Agency

Environment Canada recommends that the proponent ensure that they are not required to report under the National Pollutant Release Inventory (NPRI) Program.

Disposition:

The proponent was notified of the NPRI requirements.

Health Canada

No concerns.

Disposition:

No action needed.

Manitoba Conservation – Environmental Services

No concerns.

Disposition:

No action needed.

Manitoba Conservation – Sustainable Resource & Policy Management Branch

No concerns.

Disposition:

No action needed.

Manitoba Conservation – Central Region

The following comments were provided:

1. The use of paint arrestors/paint pockets as well as pleated filters prior to exhaust to atmosphere will control the particulate emissions from the spray paint booth but will do little to nothing to reduce the odorous volatile organic compounds contained in the paints/primers used. As indicated under section iii) Existing Land Use the above facility is located in close proximity to Sisler High School, 92 m to the south west, an apartment complex on Fife Street to the east and south beyond the City of Winnipeg vacant lot is Fred Douglas Lodge, a medical care nursing complex. Even with what is considered as insignificant use of the spray booth, given the diverse make up of the surrounding receptors, odours may be an issue.
2. Section viii), b. Impact due to odours from Volatile Organic Compounds – the only attached MSDS is for Methyl Ethyl Ketone.

Disposition:

The proponent completed further analysis of VOC emissions and determined that the quantities of VOCs to be emitted are insignificant and not expected to create an impact. Clause

10 of the draft Environment Act Licence addresses odour. The proponent provided additional MSDS for all paints and coatings used.

Manitoba Conservation – Pollution Prevention Branch

The following comments were provided:

1. Painting systems typically emit VOCs present in the paint(s) and solvent(s) being used. To address the emissions, two types of filter (in series) will be installed to capture such emissions. For intermittent or light spray painting, it may be sufficient that the exhaust air is filtered using a dry disposable filter (Australian EPA). The company will use the same painting system with its other plant located in Winnipeg.
2. Specific mention was made of the use of Methyl Ethyl Ketone (MEK) as solvent. Although initially MEK was included in the list of toxic air pollutants by the US Environmental Protection Agency, it was delisted after extensive technical review and consideration of public comments. However, there are still occupational safety concerns for contact with MEK (see MSDS).
3. Emissions of MEK as a volatile organic compound contribute to the formation of ground-level ozone. MEK emission is also a reportable contaminant in the NPRI. In 2006, Boeing Canada (Winnipeg) reported 14 tons of MEK emission. The efficacy and efficiency of the filter in MEK emission removal may be reviewed to reduce its emission into the atmosphere. However, apart from the NPRI reporting requirements, I have not seen Canadian regulations regarding MEK emission. The only regulation I've encountered is MEK being included in the "*List of Precursors and Chemicals Frequently Used in the Illicit Manufacture of Narcotic Drugs and Psychotropic Substances under International Control*" (Health Canada).
4. When paint (such as polyurethane) containing isocyanates (MDI, etc.) is used, any over spray which results from painting shall be collected and prevented from escaping to the atmosphere.
5. Some spray booth equipment may cause significant noise at neighbouring properties. It is essential that when the spray booth is installed, the maximum noise level of the ventilation fan(s) and any other equipment be considered; especially since right across Fife Street is a residential area.

Disposition

The proponent completed an analysis of VOC emissions and determined that the quantities of VOCs to be emitted are insignificant and not expected to create an impact. Clause 9 of the draft Environment Act Licence addresses noise.

Manitoba Culture, Heritage and Tourism – Historic Resources Branch

The following comment was provided:

1. No concerns related to the proposal. If at any time however, significant heritage resources are recorded in association with these lands during development, the Historic Resources Branch may require that an acceptable heritage resource management strategy be implemented by the developer to mitigate the effects of development on the heritage resources.

Disposition:

No action needed.

Manitoba Agriculture, Food and Rural Initiatives

No concerns.

Disposition:

No action needed.

Manitoba Water Stewardship

The following comments were provided:

1. The proponent indicates that approximately 50 litres of hazardous materials will be on site. The proponent should ensure that no liquid material (paints or other hazardous material) be leaked to floor drains or other access points to the City of Winnipeg sewer system.
2. The proponent should develop and implement an immediate clean-up plan for accidental spills or leaks and an emergency response plan.
3. No hazardous materials can be directed towards the City of Winnipeg sewer system.

Disposition:

Clauses 20 and 21 of the attached draft Environment Act Licence address chemical storage and spill containment and clause 24 addresses emergency response planning.

PUBLIC HEARING:

A public hearing is not recommended.

RECOMMENDATION:

The Proponent should be issued a Licence for the construction and operation of a spray painting facility 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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