

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPOSER: Elite Redi-Mix Ltd.
PROPOSAL NAME: Concrete Batch Plant
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Concrete Batch Plant
CLIENT FILE NO.: 5560.00

OVERVIEW:

On January 11, 2012 Manitoba Conservation and Water Stewardship received a Proposal dated December 1, 2011 for the construction and operation of concrete batch plant at 41 Clearspring Road in the City of Steinbach. The facility will produce redi mix concrete for use in construction projects in the Steinbach area.

The Department, on February 3, 2012, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Winnipeg Public Library, the Manitoba Eco-Network, the Millennium Public Library, and the Jake Epp Public Library in Steinbach. 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 Steinbach Carillon on February 9, 2012. The newspaper and TAC notifications invited responses until March 9, 2012.

COMMENTS FROM THE PUBLIC:

There were no public comments.

Disposition:

No action required.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Canadian Environmental Assessment Agency

No concerns.

Disposition:

No action required.

Environment Canada

The following is a summary of the comments provided:

- Concrete plants can emit significant amounts of fine and coarse particulates, as well as gaseous emissions. Particulate matter less than 2.5 microns in size (PM_{2.5}) has been declared toxic under CEPA and a danger to human and environmental health. (Please visit the following site: <http://www.ec.gc.ca/air/default.sap?lang=En&n=2C68B45C-1> to find a fact sheet outlining the health effects of PM.)
- Concrete is made by mixing Portland cement, water, and coarse (stone) and fine (sand) aggregates and may include the addition of admixtures (chemicals to control setting properties). Supplementary cementing materials (SCMs) may also be used to replace a portion of the cement. SCMs used include fly ash (by-product of coal-fired power generation), ground blast furnace slag (by-product of metals smelting) and micro silica (silica fume). The proposal indicates the use of fly ash as SCM.
- It should be noted that 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.
- Particulate matter is the main substance of concern released from this sector, accounting for about 1.6% of the total PM from Canadian sources. PM is mainly released through fugitive emissions during materials handling and storage activities.
- Environment Canada has concerns regarding these types of operations, and refers the proponent to the Canada-Wide Standards for PM and Ozone that was developed by the CCME to address the industrial sector where emission reduction strategies for PM were developed. Batch plants such as the above project can emit significant amounts of PM and gases if not equipped with proper air pollution control devices or if these control devices are not operated or maintained properly. More information on the CCME initiatives and the joint initial actions for the hot mix asphalt sector can be found at http://www.ccme.ca/ourwork/air.html?category_id=99.
- EC acknowledges the proponent's proposed mitigation to reduce the emission of PM and recommends that the proponent continue to implement the Best Available Techniques (BAT) as outlined in Section 4.2 of the "*Multi-pollutant Emission Reduction Analysis Foundation (MERAFA) for the Hot-Mix Asphalt Sector (September 2002)*" This report is available at www.ccme.ca/pirwprl/aor/jt.?:category_id=107.
- EC notes that this facility may have reporting requirements under the National Pollutant Release Inventory.
- EC acknowledges the commitment that no direct surface water discharge will occur and that all water from wash out or cleaning of the concrete trucks will be contained. EC reminds the proponents of their obligations under the *Fisheries Act*.

- EC recommends that the proponent apply the best practicable technology, including mitigation technology, and the best management practices for the proposed project.

Additional comments, information, and advice were provided to the proponent.

Disposition:

Clauses 9 to 17 of the draft Environment Act Licence address air emissions and clauses 27 – 30 address wastewater.

Manitoba Conservation and Water Stewardship – Air Quality Section

The following comments were provided:

- Provided that the dust collectors on the silos and other pollution control measures (example: watering) are appropriately operated and maintained, and the MHCA's "Best Management Practice for Redi-Mix Concrete Plants Manual" is followed, it is expected that concerns regarding air pollution will be addressed.
- It is suggested that the EA Clause regarding noise nuisance be included.

Disposition

Clauses 13 to 17 of the draft Environment Act Licence address air pollution control equipment, clause 5 requires compliance with the best management practice manual, and clause 10 addresses noise.

Manitoba Conservation and Water Stewardship – Environmental Operations Branch

The following is a summary of comments provided:

- It is not clear how water from the wash out area, and other areas of the plant will be collected and disposed. Therefore the proponent is requested to provide further details on how all wastewater will be contained, collected and disposed.
 - *The proponent responded that wash water is contained in a collection area on site and that any excess wash water will be disposed of by septic haulers.*
- There is a concern related to the high pH of the wash water and the environmental effects that could result from the potentially caustic nature of the wastewater if it is not properly managed.

Disposition

Clauses 27 – 30 of the draft Environment Act Licence address wastewater.

Manitoba Conservation and Water Stewardship – Lands Branch

No concerns.

Disposition

No action needed.

Manitoba Conservation and Water Stewardship – Parks and Natural Areas Branch

No concerns.

Disposition

No action needed.

Manitoba Conservation and Water Stewardship – Sustainable Resource and Policy Management Branch

No concerns.

Disposition

No action needed.

Manitoba Conservation and Water Stewardship – Water Stewardship Division

The following comments were provided:

- The Water Stewardship Division requires an *Environment Act* Licence to include the following:
 - The Licencee is required to apply for a Water Rights Licence prior to withdrawing water from the proposed well for concrete mixing purposes.
 - A contact person is Mr. Rob Matthews, Manager, Water Use Licensing Section, Manitoba Conservation and Water Stewardship, telephone: (204) 945-6118.
- The Water Stewardship Division submits the following comments:
 - The Water Stewardship Division does not object to this proposal, at this time.
 - The proponent needs to be informed of the following for information purposes:
 - Erosion and sediment control measures should be implemented until all of the sites have stabilized.
 - *The Water Rights Act* requires a person to obtain a valid licence to control water or construct, establish or maintain any “water control works.” “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 a proposal advocates any of the aforementioned activities, a person is required to submit an application for a Water Rights Licence to Construct Water Control Works. A person may contact the following Water Resource Officer to obtain an application and/or obtain information.

- A contact person is Mr. Geoff Reimer C.E.T., Senior Water Resource officer, Water control Works and Drainage Licensing, Manitoba Conservation and Water Stewardship, Box 4558, Stonewall, Manitoba R0C 2Z0, telephone: (204) 467-4450, email: Geoff.reimer@gov.mb.ca.

Disposition:

The applicant is notified of legislative requirements beyond those of the Environment Act Licence by way of this summary report

Manitoba Conservation and Water Stewardship – Wildlife & Ecosystem Protection Branch

No concerns.

Disposition

No action needed.

Manitoba Infrastructure and Transportation – Highway Planning and Design Branch

The following comment was provided:

- While we do not have any concern with the proposed development, we would like to remind the proponent that a permit from the Highway Traffic Board will be needed should their development encroach the controlled area of PTH 12.

Disposition

No action needed.

Manitoba Local Government

No concerns.

Disposition

No action needed.

PUBLIC HEARING:

A public hearing is not recommended.

CROWN-ABORIGINAL CONSULTATION:

It has been determined that Crown-Aboriginal consultation is not required as this proposal is to establish a concrete batch plant at an existing commercial development. This is an existing, developed site and this proposed additional development is not expected to affect the exercise of an aboriginal or treaty right.

RECOMMENDATION:

The Proponent should be issued a Licence for the construction 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 Environmental Operations Branch of Manitoba Conservation.

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

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