

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Selkirk Redi-Mix & Aggregates Ltd.
PROPOSAL NAME: Concrete Batch Plant
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Manufacturing Plant
CLIENT FILE NO.: 5322.00

OVERVIEW:

On August 29, 2007, Manitoba Conservation received a Proposal for the operation of a portable concrete batch plant, currently located at RL 118 – 120 CL, RL 119-120 CL, and RL 118-120 PE in the RM of St. Clements. Additional information was received on January 23, 2008 and March 17, 2008. The facility will produce concrete for construction associated with the Red River Floodway Expansion and will operate Monday to Friday between the hours of 7:00 am and 7:00 pm. There are particulate matter and noise emissions associated with the production of concrete.

The Department, on February 11, 2008, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station) Main Floor, Winnipeg; the Millennium Public Library, 4th Floor, 251 Donald Street, Winnipeg; the Manitoba Eco-Network, 3rd 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 Selkirk Journal on February 15, 2008. The newspaper and TAC notifications invited responses until March 14, 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_{2.5}) has been declared toxic under CEPA because of human health and environmental concerns.
- The project description does not indicate whether any supplementary cementing materials (fly ash, ground blast furnace slag, micro silica) will be used.
- 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 recommends that Manitoba Conservation require mobile concrete batch plants to install secondary air emission controls to reduce their particulate and gaseous emissions.
- 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 (MERAFA) 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
- The proponent should also be aware that portable concrete batch plants are required to report under National Pollutant Release Inventory.

Disposition

Clauses 11 to 26 of the Draft Environment Act Licence address concerns related to air emissions.

Manitoba Water Stewardship

No concerns.

Disposition

No action needed.

Manitoba Intergovernmental Affairs – Community Planning Services

No concerns.

Disposition

No action needed.

Manitoba Science, Technology, Energy & Mines – Climate and Green Initiatives

No concerns.

Disposition

No action needed.

Manitoba Intergovernmental Affairs and Trade – Provincial Planning Services

No concerns.

Disposition

No action needed.

Manitoba Conservation

- The proposal would benefit from a better process description including a process flow diagram.
- The proposal should include a map or diagram detailing the proposed site including neighbouring land use and distances to any neighbours (residential, commercial or industrial).
- The main issues with this plant are likely to be dust and noise. It is recommended the licence include standard noise, odour, particulate and opacity clauses.
- It is recommended the licence include a decommissioning clause. This clause should include the requirement of having the assigned Environment Officer inspecting the property to ensure that it is decommissioned properly.

Disposition:

The proponent provided the requested process flow diagram and map. Clauses 11 and 12 of the Draft Environment Act Licence address dust and noise emissions and clauses 31 and 32 address decommissioning.

PUBLIC HEARING:

A public hearing is not recommended.

RECOMMENDATION:

The Proponent should be issued a Licence for the 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 retained by the Environmental Assessment and Licencing Branch until January 1, 2010 at which time it should be assigned to Regional Operations.

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

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