

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Greenwald Holding Co. Ltd.  
**PROPOSAL NAME:** Greenwald Biomass Pelletizing Plant  
**CLASS OF DEVELOPMENT:** 1  
**TYPE OF DEVELOPMENT:** Manufacturing -  
**CLIENT FILE NO.:** 5617.00

### **OVERVIEW:**

Manitoba Conservation and Water Stewardship received a Proposal on October 1, 2012 and additional information on November 19, 2012, December 7, 2012 and February 26, 2013 for the construction and operation of a biomass pelletizing plant at 47001 Stead Road 97N, NW 1-17-08 EPM, RM of Alexander, Manitoba. The facility will use densification technology to produce stove pellets exclusively from straws produced in the area, for use by members of Greenwald colony and Brightstone Hutterite Colony.

The Department, on December 13, 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 located in Winnipeg and the RM of Alexander Municipal Office. 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 River Echo on December 19, 2012. The newspaper and TAC notifications invited responses until January 20, 2013.

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

No Comments.

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

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

No Comments.

#### **Manitoba Agriculture – Land Use Branch**

No Response.

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

No Concerns.

## **Manitoba Conservation and Water Stewardship – Enforcement and Compliance Branch**

No Response.

## **Manitoba Conservation and Water Stewardship – Programs and Strategies Branch**

Air Quality Section of Programs and Strategies has reviewed the proposal and provided the following comments:

- Based on the submitted documents (Appendix F), the cyclone (after the drying process) will be able to collect particle sizes of about 5 µm (microns). Similarly, a drawing on Appendix F indicated that air from the cyclone will be emitted through a chimney without further treatment. Based on this scenario, there will be emissions of fine particulates (in this case PM<5 microns) from the drying and separation process which may be a concern.
- It is expected that the pulse dust collector will be properly operated and maintained to ensure capture and collection of particulate matter generated from the different processes.
- It is expected that the 500 kVA Diesel generator will be properly operated and maintained.
- Regular emission source sampling is recommended during the operation stage to quantify air emissions and to determine compliance with license conditions.

### **Disposition**

Clauses 1, 7, 10, 13 and 21 of the draft Environment Act Licence address particulate emission, equipment maintenance, and emission monitoring requirements.

## **Manitoba Conservation and Water Stewardship – Pollution Prevention Branch**

No Response.

## **Manitoba Conservation and Water Stewardship – Wildlife Branch**

No Concerns.

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

No Comments.

## **Manitoba Conservation and Water Stewardship – Forestry Branch**

No Response.

## **Manitoba Conservation and Water Stewardship – Aboriginal Relations Branch**

No Response.

## **Manitoba Conservation and Water Stewardship – Lands Branch**

No Concerns.

## **Manitoba Conservation and Water Stewardship – Water Science and Management Branch**

Water Quality Management has no concerns about water quality impacts from this proposed project.

The proposal appears to be for the pelletizing of straw (agricultural crop residue) however the conditional use approved by the RM in the attached meeting minutes is for peat harvesting and pelletizing. Does this affect their application?

### **Disposition**

The discrepancy between the Rural Municipality approval letter and EAP has been addressed by the proponent.

## **Manitoba Conservation and Water Stewardship– Fisheries Branch**

Fisheries Branch has reviewed this proposal to construct a biomass pelletizing plant, office and raw material storage in NW 01-17-08 E. The applicant indicates they will process straw into burnable pellet products to supply local farm operations. Water will be trucked in from the groundwater well on the Greenwald Colony. Wastewater from the office will be held in a holding tank. No water is used in the processing and no wastewater is generated during the processing. Gull Lake is located five km to the west and Catfish Creek 7 km to the north of the site. Surface Drainage is in the direction of catfish creek.

Given the location of the proposal and the fact that there is no use or discharge of water in the processing process it would appear that there are no fisheries concerns with this proposal. However in Appendix G, the minutes of the Council meeting held on Feb 14, 2012, the resolution that was passed reads “to allow for the construction of a Biomass Pelleting Plant to extract peat moss on site and produce peat moss pellets....on the condition that: 1) prior to obtaining any building permits the owner is required to present a business plan to MB Conservation for approval, 2) that the applicant obtains all necessary permits and 3) that the operation be for the Greenwald and Brightstone colony use and supply only.”

There are some clear discrepancies between what Council approved and the proposal content as presented. Of most concern to fisheries would be the use of peat moss instead of the straw bales due to potential effects on surface water from the harvest of peat. Second the applicants indicate supplying local farm operations. This does not give the reader the sense that the supply is just for colony use as required as a condition of the resolution. We would appreciate clarification on these discrepancies.

## Disposition

The discrepancy between the Rural Municipality approval letter and EAP has been addressed by the proponent: the proponent requested the RM amend councils' conditional use approval to reflect the proposal. The proponent confirmed that the raw material for the process will be 100% straw from agricultural operation and the stove pellets will be supplied only to Greenwald and Brightstone Hutterite Colonies.

### **Manitoba Conservation and Water Stewardship – Office of Drinking Water**

No Concerns.

### **Manitoba Conservation and Water Stewardship– Water Use Licensing Branch**

No Concerns.

### **Manitoba Conservation and Water Stewardship– Climate Green Initiative Branch**

No Response.

### **Manitoba Conservation and Water Stewardship– Regional Services Branch**

No Response.

### **Manitoba Culture, Heritage and Tourism – Heritage Branch**

No Response.

### **Manitoba Innovation Energy and Mines – Energy Development Branch**

No Response.

### **Manitoba Innovation Energy and Mines – Petroleum Branch**

No Response.

### **Manitoba Infrastructure and Transportation – Flood Forecasting Branch**

No Response.

### **Manitoba Infrastructure and Transportation – Highway Planning and Design Branch**

No Concerns.

## **Manitoba Intergovernmental Affairs**

No Response.

## **Manitoba Health – Environmental Health Unit**

Please provide estimates of the types and amounts of emissions from burning the pellets, and how do these compare with other types of commonly used fuels such as wood or natural gas?

What are the possible impacts and most likely impacts on air quality from burning of the pellets?

Who are the anticipated users of the pellets produced? And what will they be used for eg heating buildings?

### **Disposition**

The proponent provided the types and amount of emissions that can result from burning straw pellets. This emission was compared with emissions from burning wood pellets, natural gas and coal. The proponent also provided the impacts of burning straw pellet on air quality and the anticipated users of the pellets manufactured by this facility. Manitoba Health has reviewed the response and indicated that it had no further concern.

### **PUBLIC HEARING:**

A public hearing is not recommended.

### **CROWN-ABORIGINAL CONSULTATION:**

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

This project is located on private land previously used for Agricultural operations and would be no infringement of aboriginal or treaty rights under Section 35 of the Constitution Act, 1982. Therefore, it is concluded that Crown-Aboriginal consultation is not required for the project.

### **RECOMMENDATION:**

The Proponent should be issued a Licence for the construction and operation of a biomass pelletizing plant in accordance with the specifications, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Environmental Compliance and Enforcement Branch of Manitoba Conservation and Water Stewardship.

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

Prepared by:

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