SUMMARY OF COMMENTS / RECOMMENDATIONS

PROPONEKT: FRANK FAIR INDUSTRIES LTD.
PROPOSAL NAME: FRANK FAIR INDUSTRIES LTD.
CLASS OF DEVELOPMENT: CLASS 1
TYPE OF DEVELOPMENT: MANUFACTURING AND INDUSTRIAL PLANT
CLIENT FILE NO: 2006.10

OVERVIEW:
A proposal prepared by Mr. Sean McKay, P. Eng., of Base Composite Technologies Inc. and dated March 24, 1998, was received on March 25, 1998, from Mr. Fred J. Zroback on behalf of Frank Fair Industries Ltd. The proposal is for the expansion of a fibreglass and thermoplastic coach parts manufacturing facility located at 350 and 400 Archibald Street in the City of Winnipeg. The development involves the hand lay-up and vacuum thermoforming of coach parts. Specific processes include mold preparation, gel coat application, lay-up, cutting, trimming, curing, demolding, grinding, drilling, sanding and assembly. Potential emissions are particulate matter and organic vapours. Emissions are controlled with high efficiency fabric filters. Anticipated operation will be 24 hours per day, 5 days per week.

This proposal was advertised in the Winnipeg Free Press on Saturday, April 4, 1998, and was placed in the Centennial Public Library, the Manitoba Eco-Network and the Main Environment Library. The proposal was sent to the Technical Advisory Committee on March 27, 1998. The public and TAC comment closing date was April 29, 1998.

COMMENTS FROM THE PUBLIC
No replies were received from the public.

No response is necessary.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

1. Manitoba Culture, Heritage & Citizenship – Historical Resources Branch – has no concerns with regard to this project’s potential to impact heritage resources.

No response is necessary.


No response is necessary.

3. Manitoba Urban Affairs - Urban Planning and Development Branch - comment that it has no objection to the proposal.

No response is necessary.

   *No response is necessary.*

5. **Manitoba Environment – Management Division - Terrestrial Quality Management Branch** – did not reply.

   *No response is necessary.*

6. **Manitoba Environment – Management Division - Air Quality Management Branch** – has the following comments:

   - how frequently do the particulate air filters need to be changed
   - there are no air pollution controls to minimize styrene or other gaseous emissions
   - many of the workplace improvements will lead to increased environment levels
   - what control equipment is used to remove the particulates from the exhaust stream
   - what is the efficiency of the particulate removal on a particle size basis
   - other than styrene, what are the other constituents of the gel coats and resin
   - what time period was used to calculate the total emissions
   - what are the peak short-term emission rates
   - what is meant be the various terms used in the descriptions
   - what are the emission rates of the other constituents of the gel coats and resin
   - no information is provided on the ambient levels of styrene or the emission and ambient levels of the other constituents
   - what additional efforts can the company take to reduce their emissions
   - the odour clause should be included in the licence.

   *These comments were sent to the proponent for reply. The proponents reply was sent to the TAC member for further comment. No further comments were forwarded by the TAC member. No further response is necessary. The relevant issues have been addressed in the licence.*

7. **Environment Canada – Canadian Environment Review Agency** – state that no environmental assessment of this project will be necessary under the *Canadian Environmental Assessment Act.*

   *No response is necessary.*

8. **Manitoba Natural Resources – Policy Coordination Branch** – has no concerns.

   *No response is necessary.*

9. **Manitoba Environment - Operations Division – Winnipeg Region** – have the following comments:

   - styrene has the potential to cause off-site impacts
   - other VOC releases have lesser potential for impact but should be considered, particularly the waste solid and liquid storage
   - new CCME guidelines could be used for this development
   - a series of measures can be introduced to reduce the emissions of styrene and reduce the chance of off-site impacts
As these comments were received after the closing date of the proposal, they have not been forwarded to the proponent for comment. The relevant issues have been addressed in the licence.

10. **Manitoba Agriculture – Soils and Crops - Soil Resource Section** – did not respond.

   *No response is necessary.*

11. **Manitoba Highways and Transportation - Highway Planning and Design** – did not respond.

   *No response is necessary.*

12. **Manitoba Industry Trade and Tourism** – did not respond.

   *No response is necessary.*

13. **Manitoba Health - Public Health - Environmental Unit** – did not respond.

   *No response is necessary.*

14. **Manitoba Labour - Workplace Safety and Health Division** – did not respond.

   *No response is necessary.*

**PUBLIC HEARING:**

Public hearings were not requested nor convened.

**RECOMMENDATIONS:**

A Licence considering the above relevant concerns as well as those of the Approvals Branch be prepared (Draft Licence attached) and issued. Responsibility for enforcement of the Licence may be transferred to the Region.

**PREPARED BY:**

Richard Johns  
Environment Officer  
Municipal & Industrial Approvals  
May 6, 1998

Telephone: (204) 945-7023  
Facsimile: (204) 945-5229  
E-mail: rjohns@mb.sympatico.ca

Attachment