SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT:	INTERLAKE CHEMICALS LTD.
PROPOSAL NAME:	Waste Liquid Organics Collection
	and Disposal Facility
CLASS OF DEVELOPMENT:	DGH&T ACT
TYPE OF DEVELOPMENT:	N / A
CLIENT FILE NO.:	4435.00

OVERVIEW:

The proposal dated April 13, 1999 was received by the Department on April 15, 1999. The proposal relates to the receipt of waste "heads" by product from The Seagram Company Ltd. in Gimli. The liquid organic mixture containing by products of the distillation process, such as acetaldehyde, methanol, and ethyl acetate is composed mainly of ethanol. The liquid will be used as a fuel and will be stored in three 300 gallon tanks, before being burnt in an INOV8 burner system. The heat generated will be used to heat water, which will then be circulated through pipes in order to heat a home and company shop.

The proposal was advertised in the Gimli/Arborg Interlake Spectator on May 31, 1999. and was placed in the following public registries :- the Centennial Public Library, the Manitoba Eco-Network, the Environment Library, the Selkirk Community Library and the Rural Municipality of Gimli office (as Registry).

The closing date for public response was June 25, 1999.

The proposal was sent to TAC on May 27, 1999 with a response closing date of June 25, 1999.

A Stage 1 Licence was issued August 27, 1999. This Licence permitted construction but not operation of the facility.

COMMENTS FROM THE PUBLIC:

There were no comments received in response to the newspaper advert.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Manitoba Environment, Environmental Quality Standards Branch, Water Quality Management Section had the following comments:

1. Clarification is needed on what liquid containment is present at the facility in the event of a spill or leak of any of the three storage tanks.

2. It is unclear what direction the surface flow is likely to take in terms of topography of the property in relation to the storage facility.

3. Clarification is needed as to the location of the well supplying potable water to the residence in relation to the storage facility.

4. Information on the composition and toxicity of the "heads" liquid has not been provided. More detail is needed.

The concerns of the Water Quality Section were addressed satisfactorily by the proponent.

Manitoba Environment, Environmental Quality Standards Branch, Air Quality Management Section had the following comments:

1. If the oil burner allows for complete combustion of the "heads" mixture, then the exhaust gases should be primarily carbon dioxide. If, however, the burner does not combust the mixture completely, then toxic decomposition products may be produced. According to Material Safety Data Sheets for the chemicals, the products may include formaldehyde, carbon monoxide, isobutylene and other acrid fumes. Has the proponent or manufacturer provided a guarantee that combustion would be complete with this mixture?

2. According to the description of the INOV8 Used Oil Burner system, vapours released from the oils are extracted before passing through the oil nozzle. The purpose of this system is to produce a stable clean flame. Since the mixture is heated to 185^{0} F before entering the nozzle (to produce a hotter flame), then those components of the "heads" mixture with a boiling point less than 185^{0} F will presumably be vapourized and removed before combustion. The three components that would be affected by this process are acetaldehyde (bp 69.8^{0} F), methanol (148° F) and ethyl acetate (172^{0} F). What happens to these vapours once they are removed? Are they vented? Only isobutanol, ethyl propionate and diethyl acetal have boiling points above 185^{0} F.

Both of the points outlined above raise some doubts as to the ability of the used oil burner to combust "heads" mixture reliably.

The concerns of the Air Quality Section were addressed satisfactorily by the proponent.

Manitoba Environment, Eastern/Interlake Region had the following comments:

The heads should be transported in secured leak proof containers. The contents should be clearly marked and appropriately placarded.

The waste liquid organics should be stored in a secure shed.

The three 300 gallon storage tanks should be water tight, chemical resistant and securely anchored. The tanks should be appropriately labeled. The tanks should be located where they can be routinely inspected for leaks on all sides.

The operator should have an emergency plan in the event of fire or explosion.

The concerns of the Eastern/Interlake Region were addressed satisfactorily by the proponent.

<u>Manitoba Natural Resources</u> noted that Camp Morton Provincial Park is located slightly east of the proposed facility site. Air water or noise emissions from the operation of the facility should not affect park users.

Manitoba Historic Resources had no concerns.

<u>Canadian Environmental Assessment Agency</u> responded that after a full review by federal departments with potential interest, application of the Canadian Environmental Assessment Act with respect to this project will not be required.

PUBLIC HEARING:

It was decided that a Public Hearing was not required.

RECOMMENDATION:

The Draft Stage 2 Licence should be reviewed by the Director, finalized and then issued. The Licence when issued, should be assigned to the Eastern/Interlake Region for enforcement.

PREPARED BY:

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