SUMMARY OF COMMENTS/RECOMMENDATIONS

PROONENT: FAROEX LTD.
PROPOSAL NAME: Heat Cleaning Oven Facility
CLASS OF DEVELOPMENT: N/A
TYPE OF DEVELOPMENT: Hazardous Waste (Dangerous Goods Handling & Transportation Act Application)
CLIENT FILE NO.: 5094.00

OVERVIEW:

On April 25, 2005 the Department received an Application from Faroex Ltd. for the development and operation of a heat cleaning oven facility. The oven will be located at the company property at 123 Anson Street in Gimli, Manitoba. On May 2, 2005 the Department placed copies of the Application in the Public Registries located at 123 Main St. (Union Station), at the St James-Assiniboia Public Library in Winnipeg, at the Manitoba Eco-Network, at the Selkirk – St Andrews Regional Library and at the R. M. of Gimli office. As well, copies of the Application were provided to the Technical Advisory Committee (TAC) members. The Department placed a public notification of the Application in the Interlake Spectator on May 9, 2005. The newspaper and TAC notification invited responses until June 7, 2005.

COMMENTS FROM THE PUBLIC:

No comments were received from the public.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Conservation - Sustainable Resource Management Branch, Environmental Stewardship Division.

1. What is the distance to the nearest non-industrially zoned property (e.g. commercial, residential and institutional)?
2. What is the anticipated mass of material to be treated by the heat cleaning oven during its daily shift and how does this compare to the design capacity of the unit?

It was also noted that since any combustion process is rarely 100% complete, it is likely that there will be products of incomplete combustion as well as nitrogen dioxide in the stack emissions. The proponent is correct in that the Canada-Wide Standards for dioxins/furans and mercury are not intended to apply to these small units.

Disposition.
1. The nearest non-residential zoned property(s) are located approx. 1km north, a farm residence and approx. 3 km east, a residence.
Disposition (cont.)

2. The purpose of the oven is to clean resin build up off of tooling which presently is undertaken manually and is therefore extremely time consuming. Accordingly the oven will only be used on an as required basis and not in operation as a daily requirement of our production process. While the oven is capable of burning off several hundred pounds on a daily basis, our requirements will total 15-20 pounds at most over the course of a week. Since we have several sets of tooling resin impregnated tooling is accumulated and the resin will be burned off at one time within a few hours. This is consistent with our present practice with the exception that the resin is removed manually.

Intergovernmental Affairs and Trade – Community Planning Services Branch, Community and Neighbourhood Planning Division.

The department has no objection to the heat cleaning oven facility. The subject property is designated “G I” Gimli Industrial Park in the Eastern Interlake Development Plan and zoned “MP” Industrial Park in the Gimli Zoning By-Law. A Development permit is required for proposed construction.

Disposition.
The proponent was advised of the information and replied that they will review the installation and obtain any necessary permits regarding installation if necessary.

Culture, Heritage and Tourism - Historic Resources Branch, Culture, Heritage & Recreation Programs Division.
No concerns.

Transportation and Government Services – Highway Planning & Design Branch, Engineering and Operations Division.
No concerns.

Canadian Environmental Assessment Agency
Following a review by all federal departments with a potential interest in the proposed development, the application of the Canadian Environmental Assessment Act with respect to this proposal will not be required.

COMMENTS ON THE DRAFT LICENCE FROM THE TECHNICAL ADVISORY COMMITTEE:

Conservation - Sustainable Resource Management Branch, Environmental Stewardship Division.

1. **Clause 10**: A definition for “Total Hydrocarbons” is needed.

2. **Clause 15**: In addition to the standard clause on performing stack sampling, other standard clauses on providing stack sampling facilities and a pre-test plan should also be included, namely:
"The Licencee, upon written request from the Director, shall provide a stack or stacks including all necessary sampling facilities for the sampling of air emissions at the Development. The stack or stacks shall be provided:

a. at a location(s) and within a time frame satisfactory to the Director; and
b. to the specifications and in accordance with the most recent version of Manitoba Conservation Guideline, Guideline for Stack Sampling Facilities, unless otherwise approved by the Director."

"The Licencee, upon a written request from the Director, shall submit a detailed plan which is acceptable to and approved by the Director, for the sampling and analysis of potential air pollutants, released as stationary point and fugitive emissions, including any compounds determined by the Director. The plan shall identify the rationale for the sampling; the ways and means by which the sampling program will be implemented including any special measures or methods which would be necessitated by influencing factors such as unfavourable weather conditions, the need for large or additional sample volumes, the need for multiple sampling runs; the methods used for the sampling and the analysis for each compound; the detection level to be attained; a comprehensive QA/QC program, and other items as may be identified by the Director."

Disposition.
The definition for hydrocarbon was added to the licence.
The requirement for the licencee to provide a stack sampling plan was added to the licence.

PUBLIC HEARING:
A public hearing is not required.

RECOMMENDATION:
The Applicant should be issued a Licence, in accordance with the attached draft, to operate the Heat Cleaning Oven facility. Enforcement of the Licence should be assigned to the Interlake Region.

PREPARED BY:

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