

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT: 6539963 CANADA LTD. operating as: INDUSTRIAL METALS (2006) LP**

**PROPOSAL NAME: Scrap Processing and Auto Wrecking Facility**

**CLASS OF DEVELOPMENT: Class 1**

**TYPE OF DEVELOPMENT: Scrap Processing and Auto Wrecking**

**CLIENT FILE NO.: 5344.00**

### **OVERVIEW:**

The Department received a Proposal from Industrial Metals (2006) LP. on May 22, 2008 for the continuing operation of a Scrap Processing and Auto Wrecking Facility, with the addition of new equipment - a shredder located at 550 Messier Street in Winnipeg. The location is zoned M3.

On May 27, 2008 the Department placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Millennium Public Library and the Manitoba Eco-Network. As well, copies of the Proposal were provided to the Technical Advisory Committee (TAC) members. The Department placed a public notification of the Application in the Winnipeg Free Press on May 31, 2008. The newspaper and TAC notification invited responses until June 30, 2008.

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

3 letters of concern were received from local industry:

A letter was received from Mr. Fred Rakowski on behalf of Rakowski Cartage and Wrecking Ltd.:

Please accept this letter as my formal objection re: Industrial Metals proposed plans for operating business as a "Shredder Facility" as per File #: 5344.00. Rakowski Cartage & Wrecking Ltd. is in close proximity to this location and we believe our location and business would be adversely affected by this proposed activity. To further explain our strong opposition, please find the following reasons for our concerns;

Dust & Fume control – The process can generate substantial particulate / dust through turbulence and heat / vaporization of fluids introduced into the shredder box.

Noise control – Shredders make significant noise during routine operations. In addition to noise during routine operations, all shredders suffer regular explosions through shredding of unseen gas tanks, propane tanks, fertilizer, etc....Explosions can vary substantially in power and noise, etc...

Traffic – Purchase, installation and operation of a shredder are expensive, and hence substantial production volume is required to decrease the “per unit” production costs to the point where shredding is profitable. Typical low range volumes for successful shredder operation are in the range of 10000 tons of shred produced per month. Note that because of separation of non-metallic / waste components from car bodies, etc during the shredding process, the production of 10000 tons of shred requires 13000 to 15000 tons of infeed. Further to this, note that traffic increases will not only be seen on the inbound side, as the shipment of this waste to a landfill offsite will be required.

Fluff – Fire Concerns. As per last week’s comments made in Wpg. Free Press re: steel /scrap processing plant located in Selkirk, MB....you had “toxic fumes” exposing Selkirk residents. In the mentioned proposed site there should be a similar concern, and if that were to happen....the action would be to evacuate half of St. Boniface? This seems quite a large ordeal that would inconvenience thousands of people.

Fluff Storage & Security – A large piece of property is required for fluff storage and a proper fence. There is no continuous fencing presently in place.

Control of environmental contaminants – Potential for the contamination of the waste stream separated from car bodies, etc. exists. Items such as mercury, lead and PCB’s can reach levels which result in classification of the waste stream as hazardous waste if not controlled.

-----

A letter was received from Mr. John D. Fehr on behalf of Beaver Bus Lines Ltd.:

Beaver Bus Lines Ltd is located at 339 Archibald Street, between Messier Street and Plinguet Street. We wish to express our concerns over the installation of a shredder at the Industrial Metals plant at 550 Messier Street.

Our concerns are as follows:

- 1) Traffic volumes. Which route is applicant planning to use to access their plant? Archibald Street is a very busy street already. We are concerned that the increased traffic due to the construction and operation of the shredder would have a negative impact on our accessing our property with our buses. In addition, there are residential areas on Archibald Street near the corner of Messier and Archibald. We are concerned that Archibald would be the preferred route. Messier Street, between the Industrial Metals plant and Dawson Road as Messier Street is not in very good condition as it is uneven and has many potholes. The applicant is also proposing to add more track age in their yard. Does the applicant have a plan as to when the rail cars would be moved in and out of their yard? Would this be done during the work day or at night? Trains moving through this area can create traffic tie-ups already.
- 2) Toxic fumes. We question the ability of the applicant to control the materials that will be processed. Although they may make a good effort to eliminate the chemicals found in plastics, gas tanks, fluids etc. these substances cannot be

- eliminated entirely. These toxins will then end up being processed through the shredder and released into the atmosphere, affecting the people living and working in the area. Depending on the wind direction the odor from the nearby mushroom plant and packing plants are noticeable. A children's playground called Happyland Park is located just west of the Archibald Street and Marion Street corner. We are concerned that toxins could reach this area as well.
- 3) Noise control. The applicant has submitted noise data studies on other shredders. We do not see any data relating to the operation of the nearby machinery or transportation to and from the site, whether by truck or by rail, which would not be reflected in the readings close to the machine. In addition there is no mention of the noise from exploding gas and propane tanks which sometimes end up being processed through the shredder.
  - 4) Safety. In addition to toxic fumes there are other concerns over safety. The process of shredding can send projectiles from the shredder. These projectiles can weigh as much as several pounds. These can cause serious damage to buildings and equipment nearby. There also a concern that these projectiles could also cause sparks. Directly to the west of the proposed shredder is Frank Fair Industries, a chemical fiberglass manufacturer. A fire at this company would be very dangerous due to the nature of the chemicals stored for their operation.

We hope that you will take time to review these concerns and consider them very carefully. In view of the negative impact we believe this shredder would have on the area around Archibald and Messier Streets we must oppose this project.

-----  
A letter was received from Mr. Mark Mossey on behalf of Gerdau Ameristeel Recycling.

We submit this letter in response to the Notice of Environment Act Proposal which appeared in the Winnipeg Free Press on May 31, 2008 regarding Industrial Metals - Scrap Processing Facility (File: 5344.00).

Gerdau AmeriSteel is the 2nd largest minimill steel producer in North America, with steel mills, steel fabrication sites and scrap operations throughout much of the continent. Through these facilities, we currently recycle approx. 10 million tons of scrap steel per year. Locally, we operate the Manitoba steel mill and the Manitoba Recycling Division in Selkirk, directly employing a total of approximately 550 people. Note also that several other local businesses are operating as direct downstream processors of our finished steel products.

The application to install a shredder at Industrial Meals has drawn our attention from two perspectives. Firstly and most obviously, this will add to the challenge of maintaining the profitability of our local recycling operations, and ultimately the sustained success of Gerdau AmeriSteel's Manitoba steel mill in Selkirk. In addition to this, we own and operate several shredders throughout North America, and are interested in driving responsible operating practices throughout that segment of the industry.

Shredders are an integral part of the scrap handling process, allowing efficient and cost effective separation of the various materials found in light gauge 'mixed' scrap such as

car bodies and miscellaneous tin. Shredding separates the ferrous (steel) from the nonferrous (metals and nonmetals) which is typically further separated into metals and 'waste', fulfilling the ultimate purpose of cleaning and densifying the metals for remelting / recycling. Across the globe, shredding is the industry standard for preparing this type of scrap for remelting. Note that other processes are available for increasing the density of car bodies and light mixed scrap to optimize freight during shipment to end users.

This said, operation of a shredder brings many risks which must be managed. From this perspective, we submit the following items as topics for thorough investigation in the licencing review process:

- i) Traffic - The capital intensive nature of this process demands significant volumes of material to defray costs and support viability of the investment. Low volume machines in the industry are currently making 8000 to 10000 tons of product per month. To generate this volume of product, 11000 to 14000 tons of infeed must be consumed (typical steel recovery in the process is around 70% of infeed volume). Increased volume of scrap means increased volume of truck and rail shipments, both in and outbound. The potential impact of this on local roadways becomes obvious by way of example, as an increase of 2000 tons per month at an average inbound load weight of 10 tons and an average outbound load weight of 20 tons results in 300 more truckloads per month.
- ii) Distance to Property Line / Area Businesses and Residents - Shredders are typically located away from property lines to control the risk of negative impacts. The process generates substantial noise, and can generate both fugitive and process related fumes and particulate if not controlled.
- iii) Explosions - Shredder infeed comes from a variety of sources, including car bodies. The risk of sealed cylinders (propane, etc), gas tanks or others incendiary explosive sources being blended with inbound scrap is high, and the ease of detection is low. Although all operators work to reduce the risk of explosions, all operators experience explosions.
- iv) Fire - Heat is generated through friction as infeed is shredded. Much of the waste component of this infeed will burn if exposed to enough heat. Although we work hard to control fire at all of our locations, even we have suffered two noteworthy fires in 2008 (Midlothian TX in May, Selkirk MB in June), and we are far from alone in the industry.
- iv) Vibration - A small shredder's structure will weigh well over 100 tons. When operating, the rotor (30 to 40 tons) within this structure will be rotating at between 500 and 600 rpm, driven by a motor of 2500 HP (as per the application) or more. Imbalances in the machine and / or the shredding process itself generate vibration which can, depending on ground conditions, etc., be substantial and felt at a distance.

In summary, shredding is a necessary and beneficial process, but control of impacts and risk management in general bring significant challenges which must be managed with constant diligence. We ask that this is taken into careful consideration for the proposal at hand.

-----  
6 letters were received from local residents.

A letter was received from Teresa Cwik together with a petition signed by 102 local residents:

We, the residents of the Dufresne Avenue Neighborhood oppose the proposal filed by Industrial Metals for the continuing operation of a scrap processing facility that will include the use of a shredder to replace other processes that have been used in the past.

We believe that the use of a shredder included in the proposal is located too close to our established residential neighborhood.

We are concerned about the dust, fumes, noise, fires, explosions, projectiles, traffic, environmental contaminants, etc. that the use of a shredder of this magnitude would generate in our neighborhood.

1. Dust and fume control — This process can generate substantial particulate dust through the turbulence and heat /vaporization of fluids introduced into the shredder box.
2. Noise control - The shredder will make significant noise during routine operation. In addition to this noise, all shredders suffer regular explosions through shredding of unseen gas tanks, propane tanks, fertilizer, etc. Explosions can vary substantially in power and noise etc.
3. Traffic — The purchase, installation and operation of the shredder are expensive thus substantial product volume is required to decrease the per unit product costs to a point where shredding is profitable. Typical low range volumes for a successful shredding operation are in the range of 10,000 tons of shred produced per month. Note that because of separation of non-metallic and/or waste components from car bodies etc. during the shredding process, the product of 10,000 tons of shred requires 13,000 to 15,000 tons of infeed. Furthermore, there will be a significant increase in inbound as well as outbound traffic due to the necessity of an offsite landfill(s). It will also take approx 500 trucks to bring material to the site.
4. Projectiles - The innate violence of the process can send projectiles flying from the mouth of the shredder as the impact of the shredder hammers and tears infeed apart and sends pieces ricocheting off of the shredder body and surrounding structure. Particles weighing up to several pounds will regularly travel distances over 100 feet if uncontrolled. The rotors in the shredder rotate approximately 600 revolutions per minute, ripping steel to pieces. The more revolutions per minute heighten the chance of projectiles being thrown. How will this be stopped? Also, surrounding the site

with rubber does not always prove effective.

5. Control of environmental contaminants - The potential for the contamination of the waste stream separated from car bodies, etc. exists. Items such as mercury, lead and PCB's can reach levels which result in classification of the waste stream as hazardous waste if not controlled. Industrial Metals facility is situated near the Seine River. Our concern is that some of these PCB's and other hazardous materials will seep into the ground, sewage system, etc. finding its way into the Seine River and ultimately polluting the environment, harming wildlife, etc.

What procedures and precautions does Industrial Metals have to guard against the above-mentioned?

It was only a short time ago that Gerdau-Ameristeel had a major fire at their facility in Selkirk, Manitoba and it was not long ago that there was a major fire at Buck's Auto where several thousand cars burned, many residents were evacuated and Lagimodiere Blvd. was closed. *Please see attached newspaper articles.*

What about the noise and shaking of the ground that a shredder will cause? It is understood that the vibrations of the shredding can be felt up to approximately one mile away. What guarantee is Industrial Metals putting into place to ensure that our homes will not be damaged due to these vibrations? Are they willing to place a bond in order to ensure that our homes will be repaired without residents having to result in costly legal action, an expense that most residents will likely not be able to afford? A bond of this caliber should be in excess of \$1,000,000.00. Is Industrial Metals prepared to purchase the homes of those who are unable to tolerate the noise or chemicals produced by their facility?

The hours of operation, being 7am to 7pm, are far too long. The length of the shift, if this application is approved, should be permanently limited to 8 hours per day, Monday through Friday, with no operations permitted during weekends or holidays.

We do not want to listen to the grinding, tearing, hammering, shredding, etc at all, let alone beyond regular working hours. We do not have much time to relax and enjoy what little time we have outside of working hours as it stands. We will no longer be able to enjoy this time as we will now have to contend with the noise and odors generated from the shredding operation. There will now also be an accumulation of dust and debris all over our neighborhood. A berm or fence will do nothing to prevent the travel of dust and noise created by this industry.

How is Industrial Metals going to dispose of oil, antifreeze, and transmission fluids, etc? What will they do with the hazardous materials?

What kind of liquid are they going to use to spray the materials with so they do not catch on fire in the shredder? If it is water, then we must remember that water freezes so then what are they going to use when the temperature decreases below 0°c to prevent fires and explosions?

As for the sound levels that were provided in the application, what were they shredding

at the time of testing? The destruction of materials produces different and louder noises depending on the type of material. What exactly was being shred at that time? Was it appliances, cars, aluminum, etc (which would all produce an extreme amount of noise)? How close is the shredder going to be from the property line of its neighbors?

A study of local shredders should be done to determine their noise levels and shaking before a decision is made.

Do they have radiation detector equipment? These should be over the rails and truck scales. Fluorescent light ballasts have PCB's. Are these going to be shredded? Are vehicles, air conditioners, etc. all equipment that contains Freon, inspected and certified contaminant free prior to shredding? How long will inventory be sitting on the lot? It should be noted that the former IKO site had to be cleaned up due to the contamination of its property which is located near the Industrial Metals site.

This type of shredding operation should be constructed outside city limits and nowhere near a residential neighborhood.

It should be noted that, earlier this year, it was this very same company (Industrial Metals) that told the residents of our neighborhood how very dangerous and noisy this type of operation is and helped us stop Gerdau-Ameristeel when they tried to get rezoning in order to do the very same type of operation on the lot right next to them.

Industrial Metals and the residents of our neighborhood were successful in stopping the re-zoning (the zoning right next to them is M2).

We urge Manitoba Conservation to reject this proposal or at the very least, to restrict hours of operation, permitting them to operate solely for 8 hours, commencing no earlier than 8am and ceasing no later than 5pm. We also request that a study be carried out to determine whether or not noise levels and vibrations are of acceptable level so as to not disturb the surrounding residents, damage their property or cause any health related issues.

-----

A letter was received from Mary Palano of Kavanagh Street:

I live close to where they are planning a metal/scrap processing facility and I am completely against it as it will create noise/dust and also the shaking of our older homes. We don't want this in our area. A facility like that should be built outside of the city limits not in our neighbourhood.

-----

A letter was received from Robyn Palmer/ Save our Seine River Environment:

A resident on the St. Boniface area contacted me today with concerns about the possible installation of a scrap metal shredder at the Industrial Metals site near the Seine River. Apparently a notice went into the Free Press on May 31st, 2008 of the company applying for some sort of special permit to allow the installation of the shredder. The resident informed me that the decision would be made by Monday June 30th so it would be greatly appreciated if you could forward any information

concerning this project to our organization so that we may examine it and become more familiar with the proposal. We understand that shredders located in urban areas not only cause a great deal of noise pollution while in operation but they also result in particulate dust, the escape of toxins from various substances (freon, PCBs, VOCs, etc.), the risk of explosions, the increased vehicular traffic incurred to the area due to transportation requirements for the materials as well as the waste products, etc. Save Our Seine would like more information on mitigation measures that will be in place to prevent environmental damages, a copy of the environmental impact assessment that was most likely performed, and any background information that you may be able to provide.

-----

A letter was received from Daniel Lambert of Doucet Street:

I wish to object to the granting of a license to Industrial Metals (2006) for a shredder on the grounds that as a resident in close proximity my quality of life will be adversely affected.

I would just like provide notice to the Department of Conservation that I plan to present a written and/or oral argument opposed to the proposal when the opportunity is available.

-----

A letter was received from Andrew, Mary and Sophie Gaska:

The expansion and/or subsequent addition of processing ferrous metal should not be approved in this location.

For many years residents in St.Boniface, particularly those living between Archibald St. and the Seine River have had to endure the environmental damage as well as the hazardous waste processing in their area that has affected not only their health, but increased noise, air and ground pollution. There has been a move more recently to not allow this heavy type of industry to operate in this area and clean up at major expense is taking place on the affected sites. The approval of this processing facility would be irresponsible and negate a lot of the work that's been done cleaning up the area.

If Mr. Chisick or anyone else in the area still operating a heavy industry that is environmentally dangerous to the community, they may want to look at or be offered alternate sites away from existing residences to continue their operations. There are so many available sites, such as on Warman and Lagimodiere, St. B. Industrial Park, etc. that would not negatively impact existing residential communities.

There is a petition being circulated and signed by most if not all residents within immediate proximity to Industrial Metals requesting that this proposal be denied. It is my hope that you, along with the councillor for St.B., will seriously take into account the negative environmental and health effects this proposal will have on the surrounding community.

Your mandate should be to relocate and/or expropriate these types of heavy industrial operators to a more suitable location and away from residential areas. It has simply been too costly for taxpayers to pay for the environmental damage cleanup that has had to take place when these heavy industries were allowed to operate in this area in the past.

It may also be the case of "not in my back yard" as this simply is in the surrounding residents' backyards. If you require additional comment or clarification, please advise. If you need a representation to be made, let us know.

-----

A letter was received from Julie Lemoine of Archibald Street :

I am writing to you in regards of the proposal set forth by Industrial Metals LP. I am a resident of the area in which Industrial Metal resides and I am worried of the impact it will have on the 'livability' of the area. Too much is still unknown as to the long term effects that such a plant would have on people of all ages and I think it would be wise not to venture into such a direction. I am all for the economic growth of Winnipeg and it's residing manufactures but I am opposed to an increase in air, noise and soil pollution within the city limits and in such a close vicinity of residential areas.

I have signed the circulation petition already but would like to add an even stronger opposition to the proposal of expansion by Industrial Metals through this email.

-----

### **Response from the Proponent**

The concerns were given to the Proponent and replies received.

(to conserve space the responses have been listed under the topic of concern)

### **TOPICS**

Noise; Traffic Volumes; Train Movement; Seine River; Location of Shredder; Radiation detection; Close to Residents; Hours of Operation; Dust and Particulates; Toxic Fumes; Control of materials being Processed; Automobile Shredder Residue; Air Study; Odours; Safety – flying projectiles; Move to another location; Vibration; Insurance Bond;

Noise. The response was:

Attached is a study performed recently at another similar shredder facility operated by our partner company. This study shows that the facilities are below the severe noise by-law requirements.

The sound level study was performed while material of every type was being shredded. The variety of the material shredded has never shown that certain material will produce louder sounds than other while being shredded.

As part of our environmental policy, we do not receive propane tanks in the yard as a rule. All inbound scrap will receive thorough inspection when entering the yard, and then again prior to shredding.

Regarding explosions, our company is very strict regarding the acceptance of materials at our facility. What our company shreds is what we will get as the end product.

**Disposition:**

The licence includes the noise nuisance clause. The Proponent will be required to carry out noise monitoring of the shredder operation after it has been set up.

Traffic volumes. The response was:

The majority of our commercial traffic (ie. Transport companies) uses Dawson Road to come into our facility because they are coming in from Lagimodier via the Perimeter Highway. Our own Lugger trucks will continue to use both entrances (Via Dawson and Archibald) but this volume will not change.

**Disposition:**

The Proponent has indicated that the majority of truck traffic will head east. The City of Winnipeg is the traffic authority that can designate truck routes.

Train Movement. The response was:

We currently bring material in and ship it out by truck and rail. As well, we currently operate a stationary shear, mobile shears and many different material handlers in the yard. The volumes of these trucks, trains and handling equipment will not change as a result of installing a shredder and has never been a cause for concern in the years we have been operating on this property. Our current rail service happens in the evenings and we have no indication that this will change.

**Disposition:**

The Proponent has indicated that train movement is in the evening and will stay that way.

Seine River Contamination The response was:

Our project team of engineers will work on the drainage of the site. The installation that will be proposed will take several aspects into consideration such as surface runoff, containment, etc. Our partner company's policy is to install shredding facilities with a paved impermeable surface for the storage/handling of the material being shredded and this installation will be no different.

Our intention is for inventory to be shredded as fast as it enters the yard. The benefit of having such a machine is that we will be able to process our material that much

faster, thus shipping it out of the yard that much faster. Our goal is to zero our “unshredded” inventory on a daily basis and to ship out finished material as fast as rail and truck transportation allows us to.

We will have a water line running inside the building going out from a higher point than the shredder in-feed. The system will drain by itself each time it is used and will be ready for the next use. This line will be a separate line off the water injection line, which means that adequate protection will be provided during winter time as well.

**Disposition:**

The Proponent will not be permitted by the licence to store ASR at the Development for more than a few days – reducing the possibility of water run off. Storage conditions for ASR will be included in the licence conditions.

Location of Shredder. The response was:

The closest residential property to our proposed installation is approximately 426 meters away from the closest resident. As such, we do not feel that there would be any concerns for the residents of this neighborhood. It has been proven in numerous reports that the noise level of a shredder is very reasonable. As for the shaking, a shredder facility is designed from ground up to be a stable structure that will not produce any shaking. Our partner company has specialized engineers that designed all of their shredder facilities, and this factor is virtually non-existent because of the design.

Local shredders are not necessarily a good example of the noise and vibration levels. Some of them were made more than 40 years ago, and did not consider key aspects such as noise level, emission of dust particles, general infrastructure, etc. We have vast information available on shredders installed by our partner company in the last few years that can better reflect the situation of a similar shredder installation.

**Disposition:**

The Proponent has indicated that the shredder location will be further to the north than was shown in the proposal. This will cause the shredder to be further away from the homes.

Radiation detection. The response was:

Radiation detection equipment will be installed on the in bound and out bound truck and rail scales. To further ensure that radioactive material is not shredded, radiation detection equipment will also be installed on the in-feed conveyer of the shredder itself.

**Disposition:**

The requirement for the use of radiation monitors is included in the licence.

Close to Residents. The response was:

The closest residential property to our proposed installation is approximately 426 meters away from the closest resident. With the various safety and planning measures taken by our company to protect our employees, the environment and surrounding areas, we do not feel that there would be any concerns for the residents of this neighborhood.

There are several measures that will be put in place to avoid any impacts to the surrounding environment. Our company doesn't see any justification in proposing a "buyout" plan. However, we are a responsible corporate entity and in case of an accident, we would gladly collaborate with the government, citizens or any other entity affected by such an accident. We feel that such an event is very unlikely to happen.

**Disposition:**

The licence will include requirements to carry out monitoring. The location of the development is zoned M3.

Hours of Operation. The response was;

As previously mentioned in point b), shredding at our facilities will stay within a strict range as demonstrated in several studies (i.e. SNF Laval). The hours of operation are very reasonable when we consider that the operations include preparation of the shredding, actual shredding and daily maintenance. The actual shredding should usually represent less than 8 hours per day. With the noise level kept to a minimum, the operations should not represent a burden for the community but more of an economic asset.

**Disposition:**

The hours of operation are included as a requirement in the licence.

Dust and Particulates The Response was

Our partner company has gained valuable experience with other shredder facilities installed throughout Canada. Among the elements that will greatly help reduce dust emissions, some measures that will be taken are:

- i) Water injection.
- ii) The final ASR bin will be covered.
- iii) Conveyors that could generate dust will be covered.

- iv) Sealed transitions.
- v) “Skirts” will be installed on dropping chutes.
- vi) The non-ferrous recovery plant will be located inside a building.

**Disposition:**

Control of dust emissions will be a requirement of the licence.

Toxic fumes. The response was:

There is no reason to think that our activities could represent a potential risk of contamination. We have full time environmental staff to keep quality control up to high standards. We keep a tight control over the material being shredded which ensures that the final product is of premium quality.

There are no such chemicals in our proposed operation. As direct proof of this, Automobile Shredder Residues (ASR) is used as clean cover at landfills across Canada and the United states. As well such ASR is now being converted in consumer products such as wood replacements for household decking material.

In order to insure that we continue with the high standards of quality control and in an effort to diminish any possible contaminants from entering the air, the following materials will be refused at our shredder, as they already are:

Aerosol; Antifreeze; PCB (eg. Ballasts); Diesel; Drugs; Gasoline; Explosives; Isolation material (eg. Asbestos); Hazardous fluids; Lubricants; Paints or cleaners; Pesticides; Chemical or Toxic products; Coolants; Dangerous Goods or residues; Radioactive substances (Radiation Detection Units at front entrance of facility); Pressurized Containers (Propane tanks etc.)

Freon is removed as part of our environmental policy. However, to further ensure that such materials do not get shredded we will also have a trained service technician on-site with the proper evacuation equipment needed in the exceptional case where an appliance is identified as not being evacuated with certification.

**Disposition:**

The licence contains requirements for control of incoming material and ASR storage and disposal.

Control of Materials being Processed. The response was:

There is no reason to think that our activities could represent a potential risk of contamination. Our partner company currently operates several shredder facilities throughout Canada, and such a situation has never happened. We keep a tight control over the material entering the yard now and will continue to do so with material entering to be shredded which ensures that the final product is of premium quality.

A guide will be provided to our suppliers to inform them of the conditions of acceptance and information on how and where they can dispose of the hazardous materials recovered from car bodies. If any supplier is not in conformance with our policy, we will immediately refuse any shipment coming from their facilities and notify the environmental authorities if appropriate. The respect of these conditions is very important to our company, since a car with hazardous material could potentially pose a hazard to the health and safety of our employees.

As part of our environmental policy, all appliances that are going to be received at Industrial Metals will need to be free of all coolants and ozone depleting substances. All suppliers will have to adhere to our environmental policy and make a commitment to ensure that these substances are properly removed and recycled according to the laws and regulations in place. Identification marks (stickers) will be provided to our suppliers so they can identify which appliances were verified and can be processed at our shredder.

To further ensure that our environmental policy is respected we will also have a trained service technician available on-site with the proper equipment in the exceptional case where an appliance would be identified as being not in accordance with our policy.

A guide will be provided to our suppliers to inform them of the conditions of acceptance and information on how and where they can dispose of the hazardous materials recovered from car bodies. If any supplier is not in conformance with our policy, we will immediately refuse any shipment coming from their facilities and notify the environmental authorities if appropriate. The respect of these conditions is very important to our company, since a car with hazardous material could potentially pose a hazard to the health and safety of our employees

As part of our environmental policy, vehicles received on-site will be:

- Free of oils, lubricants, gas, windshield washer, air coolants (A/C units) and all hazardous liquids that could have been previously contained
- Free of mercury (lamps / switches)
- Free of car batteries
- Free of safety airbags
- Free of tires
- Pressed and ready to be shredded

The removal of mercury is an important aspect of our environmental policy and will be done off-site by our suppliers prior to shredding at our facilities. Our company is heavily involved in the "Switch Out" program (<http://www.cleanairfoundation.org/switchout/index.asp>) that was put in place by the Clean Air Foundation. This program allows our suppliers to dispose of any mercury-containing parts used in automobiles free of charge.

Our facility is already handling end of life batteries so, we are well versed on the safe handling of them.

All employees that handle batteries are properly trained in safe handling techniques. In case of an accident, we have an emergency response plan already in place. Batteries are stored in a safe manner, in an appropriate area to prevent any contamination in the event of an accident.

Batteries are shipped to various smelters across North America for final disposal. A list of these smelters is available if necessary.

If any hazardous materials are received at our facilities, we will dispose of them with local permitted recyclers such as Miller Environmental Corporation.

**Disposition:**

The licence will require that suppliers of scrap are educated in the importance of removal of explosive components as well as hazardous wastes and radioactive materials.

Automobile Shredder Residue. The response was:

We have full-time environmental staff to keep quality control up to our high standards. Our facilities allow 100% recycling of all materials that are processed. Residues are used as covering material in several landfills across Canada, which is greatly appreciated for its unique characteristics.

There is no reason to think that the ASR material produced at our shredder facility could ever be contaminated. Our partner company currently operates several shredder facilities throughout the province of Quebec, and such a situation has never happened. We plan to keep a tight control over the material being shredded which ensures that the final product is of premium quality. ASR is currently used as cover material in several landfills across North America, and is greatly appreciated for its particular characteristics. As further proof that ASR is not a contaminated material there are companies that now use ASR to produce consumer products such as a wood replacement for household decking material. However, to demonstrate that the ASR won't pose an environmental risk, we suggest that a sampling period could be put in place in the 6 months following the installation of the shredder. A copy of the results of the analysis would be provided to your service as well.

The ASR will be stored on site in an enclosed storage bin. Once produced, the ASR will drop directly in this closed bin which will prevent the ASR from being exposed to rain or snow. The ASR will be contained in the bin until delivered out of the site for final disposal. We expect the material to remain in the bin for a maximum of 72 hours, with the usual delay to be 24 hours.

**Disposition:**

The licence will require that ASR is stored and disposed of in a manner that will restrict the possibility of water run off, fires and dust.

Air Study. The response was:

The air study provided was from a cyclone of the same specs, size and capacity. Only the manufacturer was different.

By experience and according to companies that did sound monitoring, there isn't a noticeable difference with the material being shredded. It is the shredding equipment itself that will produce the sound.

**Disposition:**

The licence will require an "air study" to be carried out on the shredder – with the operating conditions controlled and noted, so that the effects of various inputs will be identified.

Odours. The response was:

By keeping a tight control over the material being shredded, the emission of odors is very unlikely. Our operations consist strictly of metal shredding, which is a harmless activity.

**Disposition:**

The licence will include the odour nuisance clause.

Safety – flying projectiles. The response was:

The shredder facilities are built with protection of the public and our employees in mind. The buildings and equipment are surrounded with proper caging and the conveyors are covered to avoid any particles, parts or dusts emissions to be produced by the shredding process. Such caging has been proven effective in catching all of such projectiles.

Though a valid concern, through proper containment of such projectiles there is no reason to believe that any sparks could be caused by them. As well, through extensive research on these kinds of machines, we have never been warned about sparks being caused as a result of flying projectiles.

We also have to consider that the actual shredder will be more than 100 feet away from the outer limits of the site. There are also 2 buildings that will be around the shredder which also limits the potential of any projectiles even in case of an accident.

**Disposition:**

The licence will require that suppliers of scrap are educated in the importance of removal of explosive components as well as hazardous wastes and radioactive materials.

Move to another location. The response was:

Several professionals have been working on similar shredder projects throughout Canada to provide cradle to grave recycling in numerous markets. The shredder that we propose to install in Winnipeg should prove to be a facility that will promote sustainable development for current and future generations. It should be seen as a recycling facility that will help our city conserve its green image.

**Disposition:**

The monitoring that is required by the licence will determine if the facility is located in a satisfactory M3 zoned location

Vibration. The response was:

Our team of engineers will install the shredder structure according to the quality and characteristics of the soil in presence at the site. This structure will be designed by professionals, and vibrations will not be a concern for the surrounding community. Our company would never consider installing a process that would produce vibrations that could affect the safety of our employees and the community.

**Disposition:**

The possibility of vibration control will be determined by monitoring that will be required by the licence.

Insurance Bonds The response was:

Furthermore, as a responsible corporate entity, our company already has an insurance coverage for damages to third-parties for up to 5,000,000.00\$. Although we do not think the insurance policy will ever be needed, it could cover for potential damages in case of an accident.

Some of our other facilities already established throughout Canada have put in place an environmental bond in the amount of 200,000\$. If it could alleviate concerns from the surrounding community, we would gladly put in place a similar environmental bond.

**Disposition:**

The licence will require insurance and the issuance of a bond.

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

### **Infrastructure and Transportation**

No concerns.

### **Agriculture Food and Rural Initiatives, Land Use Planning Branch**

Had the comment that there are no agricultural or agricultural land issues.

### **Culture, Heritage, Tourism and Sport -Historic Resource Branch**

Had no concerns with regard to this project's potential to impact heritage resources. If at any time however, significant heritage resources are recorded in association with these lands during development, the Historic Resources Branch may require that an acceptable heritage resource management strategy be implemented by the developer to mitigate the affects of development on the heritage resources.

### **Water Stewardship**

Had the following comments:

*The Water Rights Act* indicates that no person shall control water or construct, establish or maintain any "water control works" unless he or she holds a valid licence to do so. "Water control works" are defined as any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert borehole or contrivance for carrying or conducting water, that temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, OR changes or may change the location or direction of flow of water, including but not limited to water in a water body, by any means, including drainage. If the proposal in question advocates any of these activities, application for a Water Rights Licence to Construct Water Control Works is required.

A potential concern is surface runoff or groundwater contamination from the site where the metal fine-particulate matter or pieces of other synthetic materials, such as plastics are stored. The proponent intends to concrete the entire property. This should alleviate any concerns in terms of leaching but may accelerate potential for surface runoff unless some containment is provided and runoff is directed to drains that do not directly enter surface waters.

### **Response from the Proponent**

These comments were forwarded to the Proponent and the response was as follows:-

If it is the case that our project requires a license in accordance to the by-laws of the Water Rights Act we will apply and obtain it in accordance with this act.

As part of this project, a team of engineers will work on the drainage of the site. The installation that will be proposed will take several aspects into consideration such as surface runoff, containment, etc. Our partner company's policy is to install shredding facilities with a paved impermeable surface for the storage/handling of the material being shredded and this installation will be no different.

**Disposition:**

The Proponent was notified of these requirements and has indicated that he will comply, if appropriate.

**Conservation – Air Quality Management Section, Pollution Prevention Branch**

Had the following comments:-

- i) Metal scrap shredding is a significant source of particulate matter. Scrap shredding facilities are customarily fitted with pollution control devices most common of which are water spray and cyclone. It is my impression that the emission source of the result of analysis attached in the Environmental Act proposal is a cyclone.
- ii) Shredding of automobiles and large appliances is also a potential source of CFCs and HCFCs which are both ozone depleting substances and greenhouse gases. They are used as refrigerants and present in foam insulations (foam blowing agent) and normally found in refrigerators, air conditioners, water coolers, ice makers, vending machines and dehumidifiers. While it is mentioned in the proposal that refrigerators (and I believe all similar appliances) will be certified free from coolant (refrigerant) prior to shredding, there is no mention on how to address the foam blowing agents in insulations.
- iii) It is well documented in the United States that automobile scrap shredding activities are significant sources of mercury emissions. Mercury is used in switching devices in automobiles (primarily in hood and trunk lighting) and in large appliances. Similarly, the anti-lock braking system (ABS) of automobiles utilizes mercury. Other uses of mercury in automobiles are high intensity discharge headlamps, navigational displays and family entertainment systems. It is recommended that the proponent be required to address potential mercury emissions.
- iv) Shredding of automobile is normally noisy. However, the proposal states that “no significant source of noise is caused by the installation of a similar shredder”. This may be so in the presence of noise control devices.

**Response from the Proponent**

These comments were forwarded to the Applicant and the response was as follows:-

In order to insure that we continue with the high standards of quality control and in an effort to diminish any possible contaminants from entering the air, the following materials will be refused at our shredder, as they already are:

Aerosol; Antifreeze; PCB (eg. Ballasts); Diesel; Drugs; Gasoline; Explosives; Isolation material (eg. Asbestos); Hazardous fluids; Lubricants; Paints or cleaners; Pesticides; Chemical or Toxic products; Coolants; Dangerous goods or residues; Radioactive substances (Radiation Detection Units at front entrance of facility); Pressurized Containers (Propane tanks etc.)

To further ensure that such materials do not get shredded we will also have a trained service technician on-site with the proper evacuation (Freon) equipment needed in the exceptional case where an appliance is identified as not being evacuated with certification.

The removal of mercury is an important aspect of our environmental policy and will be done off-site by our suppliers prior to shredding at our facilities. Our company is heavily involved in the "Switch Out" program (<http://www.cleanairfoundation.org/switchout/index.asp>) that was put in place by the Clean Air Foundation. This program allows our suppliers to dispose of any mercury-containing parts used in automobiles free of charge.

**Disposition:**

The licence will contain clauses requiring control of noise, particulate emissions and in coming scrap, such as hazardous wastes

**Conservation – Parks and Natural Areas Branch**

No comments.

**Conservation – Environmental Services Branch**

Had the comment:

The removal of mercury from end-of-life vehicles prior to shredding should be addressed.

**Response from the Proponent**

These comments were forwarded to the Applicant and the response was as follows:-

The removal of mercury is an important aspect of our environmental policy and will be done off-site by our suppliers prior to shredding at our facilities. Our company is heavily involved in the "Switch Out" program (<http://www.cleanairfoundation.org/switchout/index.asp>) that was put in place by the Clean Air Foundation. This program allows our suppliers to dispose of any mercury-containing parts used in automobiles free of charge.

## **Disposition:**

The licence will contain clauses requiring control of incoming scrap, such as mercury and other hazardous wastes

## **Conservation – Central Region**

Had the following comments:-

1. point iii – reference to no immediate residential areas or schools that would be affected by this project in any way – the north portions of Kavanagh Street and Giroux Street are less than ½ kilometre from the proposed site of the shredder.
2. point vi – removal of refrigerator coolant; is this done off site or on site; this activity must be performed by a trained service technician as defined under Regulation 103/94, Ozone Depleting Substances Regulation (also applicable to automobile AC units containing ozone depleting substances). If to be done off site, by whom. Is the removal of hazardous fluids and materials (including mercury lamps/switches) from the auto bodies to be done on site – what type of storage/containment to be used; comply with Manitoba Regulation 188/2001, Storage and Handling of Petroleum Products and Allied Products Regulation ; if to be done off site, by whom. Are the batteries to be removed and stored on site, if so how stored and final disposal; if off site by whom. Disposal of the ASR material if contaminated and not acceptable to be land filled, maximum volume of ASR to be stored on site.
3. point viii – Air – the “Air Study” attached doesn’t indicate whether the study cyclone is the same as the cyclone on the shredder to be located at the 550 Messier Street site; a complete copy, in English, of the stack sampling report should be provided to ascertain sampling method used and verification of the test results. “Water/Fisheries” – no report attached; need to supply information regarding site drainage, isolation of material storage areas, if any, from city storm sewer, etc.. “Sound level” – the study does not list the in-feed material during the monitoring period; noise levels may vary dependant on in-feed material i.e. white good appliances versus auto bodies.
4. The Site Plan showing the proposed location of the shredder shows two CP Mainlines.
5. How will the ASR be stored on-site?
6. How long will the ASR be stored on-site before it is removed?

## **Response from the Proponent**

These comments were forwarded to the Applicant and the response was as follows:-

1. Our proposed installation is approximately 426 meters away from the closest resident. With the various safety and planning measures taken by our company to

protect our employees, the environment and surrounding areas, we do not feel that there would be any concerns for the residents of this neighborhood.

2. All vehicles received on-site will be in the following conditions:

- Free of oils, lubricants, gas, windshield washer, air coolants (A/C units) and all hazardous liquids that could have been previously contained
- Free of mercury (lamps / switches)
- Free of car batteries
- Free of safety airbags
- Free of tires
- Pressed and ready to be shredded

A guide will be provided to our suppliers to inform them of the conditions of acceptance and information on how and where they can dispose of the hazardous materials recovered from car bodies. If any supplier is not in conformance with our policy, we will immediately refuse any shipment coming from their facilities and notify the environmental authorities if appropriate. The respect of these conditions is very important to our company, since a car with hazardous material could potentially pose a hazard to the health and safety of our employees.

As part of our environmental policy, all appliances that are going to be received at Industrial Metals will need to be free of all coolants and ozone depleting substances. All suppliers will have to adhere to our environmental policy and make a commitment to ensure that these substances are properly removed and recycled according to the laws and regulations in place. Identification marks (stickers) will be provided to our suppliers so they can identify which appliances were verified and can be processed at our shredder.

To further ensure that our environmental policy is respected we will also have a trained service technician available on-site with the proper equipment in the exceptional case where an appliance would be identified as being not in accordance with our policy.

Our facility is already handling end of life batteries so, we are well versed on the safe handling of them. (A DGH&T Act Licence Application for battery collection has been received by the department)

All employees that handle batteries are properly trained in safe handling techniques. In case of an accident, we have an emergency response plan already in place. Batteries are stored in a safe manner, in an appropriate area to prevent any contamination in the event of an accident.

Batteries are shipped to various smelters across North America for final disposal. A list of these smelters is available if necessary.

We have full-time environmental staff to keep quality control up to our high standards. Our facilities allow 100% recycling of all materials that are processed. Residues are used as covering material in several landfills across Canada, which is greatly

appreciated for its unique characteristics.

There is no reason to think that the ASR material produced at our shredder facility could ever be contaminated. Our partner company currently operates several shredder facilities throughout the province of Quebec, and such a situation has never happened. We plan to keep a tight control over the material being shredded which ensures that the final product is of premium quality. ASR is currently used as cover material in several landfills across North America, and is greatly appreciated for its particular characteristics. As further proof that ASR is not a contaminated material there are companies that now use ASR to produce consumer products such as a wood replacement for household decking material. However, to demonstrate that the ASR won't pose an environmental risk, we suggest that a sampling period could be put in place in the 6 months following the installation of the shredder. A copy of the results of the analysis would be provided to your service as well.

The ASR will be stored on site in an enclosed storage bin. Once produced, the ASR will drop directly in this closed bin which will prevent the ASR from being exposed to rain or snow. The ASR will be contained in the bin until delivered out of the site for final disposal. We expect the material to remain in the bin for a maximum of 72 hours, with the usual delay to be 24 hours.

Our company intends to sample the ASR once per month in the first 6 months of operation. This sampling will help us determine if our material acceptance policy is respected by our suppliers. As part of our policy in place at our other shredders already in operation, a third party representative hired by Industrial Metals, will take 3 representative samples of the ASR produced once per month. These samples will be analyzed for these parameters:

Parameters	Unit	Reference	Samplings			Average
			#1	#2	#3	
Arsenic	mg/L	5				
Barium	mg/L	100				
Boron	mg/L	500				
Cadmium	mg/L	0.5				
Chrome	mg/L	5				
Mercury	mg/L	0.1				
Lead	mg/L	5				
Selenium	mg/L	1				
Oils & Grease	%	5				
PCBs	mg/kg	50				

The samples will be analyzed for their leaching attributes, according to the TCLP method developed by the US EPA. An average of the 3 samples will be compared to the reference included in the above chart. If our ASR is above the average for even a single

parameter, our suggestion would be to add an additional month (to the total of 6) of sampling to ensure that we work out any issues if needed.

3. The air study provided was from a cyclone of the same specs, size and capacity. Only the manufacturer was different.

By experience and according to companies that did sound monitoring, there isn't a noticeable difference with the material being shredded. It is the shredding equipment itself that will produce the sound.

We are not sure what stack sampling report is being referenced here but would be happy to answer any direct questions.

See attached report from our partner company's Montreal facilities (similar installation). Testing occurs at the facilities once per year, during spring. The results have always been in accordance with all applicable laws and regulations.

4. We are not sure of the relevance of this point but would be happy to respond if there is a more detailed and direct question about the CP Mainline

5. see reply to 2

6. see reply to 2

**Disposition:**

The licence will contain clauses requiring control of incoming scrap, such as mercury and other hazardous wastes; the control of storage and disposal of ASR; a monitoring programme to measure noise from the shredder;

**Canadian Environmental Assessment Agency**

The application of the Canadian Environmental Assessment Act with respect to this proposal will not be required.

**PUBLIC HEARING:**

A public hearing is not recommended.

**RECOMMENDATION:**

The Applicant should be issued a Licence, in accordance with the attached draft, to operate the Scrap Metal Processing facility. Enforcement of the Licence should be assigned to the Central Region.

PREPARED BY:

Adrian Jackson, P. Eng.  
Environmental Engineer  
Municipal Industrial Hazardous Waste Approvals  
October 14 2008

Telephone: (204) 945-7108  
Fax: (204) 945-5229  
E-mail Address: [Adrian.jackson@gov.mb.ca](mailto:Adrian.jackson@gov.mb.ca)