

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** General Scrap Partnership, a Division of Evraz Inc. NA  
**PROPOSAL NAME:** General Scrap Partnership, a Division of Evraz Inc. NA  
**CLASS OF DEVELOPMENT:** 1  
**TYPE OF DEVELOPMENT:** Scrap Processing and Auto Wrecking Facilities  
**CLIENT FILE NO.:** 340.30

### **OVERVIEW:**

On August 5, 2008, Manitoba Conservation received a Proposal for the continued operation of a scrap processing and auto wrecking facility at 135 Bismarck Street in Winnipeg, Manitoba. The facility recycles scrap materials using various processes including shredding, shearing, torch cutting, sorting, and packing. Potential dust and noise emissions, including explosions, are controlled through inspection programs and cyclones.

The Department, on August 26, 2008, 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. 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 Free Press on August 30, 2008. The newspaper and TAC notifications invited responses until September 30, 2008.

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

No public comments were received.

#### Disposition:

No action needed.

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

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

No concerns were expressed by any Federal agency.

#### Disposition:

No action necessary.

## **Manitoba Conservation – Sustainable Resource & Policy Management Branch**

The company should be required to provide some public notification to the community that it is applying for a licence

### **Disposition:**

Public notification was provided through distribution of the proposal to the public registries and the advertisement in the Winnipeg Free Press.

## **Manitoba Conservation – Central Region**

The following comments were provided:

1. The applicant indicates they will accept both lead-acid batteries and mercury switches. Acceptance of these hazardous wastes requires a licence under The Dangerous Goods Handling and Transportation Act.
2. General scrap should only accept hazardous waste from registered hazardous waste generators (unless exempt under the Act).
3. How and where are the batteries and mercury switches collected on-site disposed (licensed carriers and receivers)?
4. Are mercury switches characterized as recyclable materials under The Act (this depends on method of disposal)? If not, transportation of mercury switches will require a licensed carrier and manifesting for shipments of 5 kg or more.

### **Disposition:**

The proponent has applied for a Dangerous Goods Handling and Transportation Act Licence for this site. These concerns will be addressed through that process.

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

The following comment was provided:

The Historic Resources Branch has no concerns with regard to this project's potential impact to 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 effects of development on the heritage resources.

### **Disposition:**

No action needed.

## **Manitoba Agriculture, Food and Rural Initiatives**

No concerns.

### **Disposition:**

No action needed.

## **Manitoba Infrastructure and Transportation**

No concerns.

### **Disposition:**

No action needed.

## **Manitoba Water Stewardship**

The following comments were provided:

- *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.
- The proponent needs to be informed that if the proposal in question advocates any construction activities, erosion and sediment control measures should be implemented until all of the sites have stabilized.
- The Department requests information on the water source and how water will be used beyond domestic purposes.
  - *The proponent responds that there are two licenced groundwater wells on site, one which is used for fire and dust control at the shredder and one which is used for domestic purposes and equipment washing.*
- The proponent states that two detention basins collect all stormwater from the General Scrap property, and that the water in the basins is checked prior to discharge into a municipal drainage ditch.

- The Department recommends that an *Environment Act* Licence include the following:
  - The stormwater retention pond collecting runoff from the scrap metal yard must be appropriately lined to prevent contamination of groundwater.
  - Before water is discharged from the basin collecting runoff from the scrap metal yard into the drainage ditch, the proponent must provide sample data from the detention ponds near the time of planned discharge.
    - Water samples must be tested at a laboratory accredited by the Canadian Association for Laboratory Accreditation Inc. Water samples must be tested for a number of analytes including, but not limited to: Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Zinc, Benzene, Toluene, Ethylbenzene, and total polychlorinated biphenyls (PCB).
    - Copies of the analytical test results should be sent to Manitoba Conservation and Manitoba Water Stewardship, Water Quality Management Section.
  - Should any concentrations of these metals and compounds exceed the Manitoba Water Quality Standards, Objectives and Guidelines for the protection of aquatic life, water from the detention ponds should not be discharged into the drainage ditches. (The Manitoba Water Quality Standards, Objectives and Guidelines can be downloaded from <http://www.gov.mb.ca/conservation/eal/registries/4864wpgww/hpmc/mwqsog.pdf>).
  - Manitoba guidelines for the concentration of PCBs do not exist. Therefore, if there is a detectable concentration of PCBs, Manitoba Conservation and Manitoba Water Stewardship, Water Quality Management Section, will determine whether the stormwater is of acceptable quality for discharge into the drainage ditch.
- The stormwater retention pond collecting parking lot runoff does not need to be tested prior to discharging to drainage ditches provided that no scrap metal yard runoff, domestic sewage, or any other source of wastewater is directed into the holding pond.
- Should the operation be decommissioned in the future, samples of the surface sediment from the detention ponds should be sent to a laboratory, accredited by the Canadian Association for Laboratory Accreditation Inc., to determine the concentrations of Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Zinc, and total polychlorinated biphenyls (PCB).

- Copies of the analytical test results must be sent to Manitoba Conservation and Manitoba Water Stewardship, Water Quality Management Section.
- If concentrations of these metals (or total PCBs) exceed the sediment quality guidelines outlined in Manitoba Water Quality Standards, Objectives and Guidelines, sediment from the detention ponds must be treated as hazardous waste and disposed of appropriately.
- Sewage that is produced on site must be disposed at an approved on-site wastewater treatment facility.

Disposition

Clauses 21 - 28 of the Draft Environment Act Licence addresses storm water quality and discharge requirements and Clauses 35 and 36 address decommissioning. Water Stewardship indicated that the proponent's response addressed their other concerns.

**Manitoba Conservation – Parks and Natural Areas Branch**

No concerns.

Disposition:

No action needed.

**PUBLIC HEARING:**

A public hearing is not recommended.

**RECOMMENDATION:**

The Proponent should be issued a Licence for the continued operation of a scrap processing and auto wrecking facility in accordance with the specifications, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Central Region of Manitoba Conservation.

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

Prepared by:

Ryan Coulter, M.Sc., P.Eng.  
Environmental Engineer  
Municipal, Industrial, and Hazardous Waste Section

Telephone: (204) 945-7023  
Fax: (204) 945-5229  
E-mail: ryan.coulter@gov.mb.ca

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