

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Pineland Forest Nursery
PROPOSAL NAME: Syngas Demonstration Project
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Gasification Plant
CLIENT FILE NO.: 5563.00

OVERVIEW:

On January 16, 2012 Manitoba Conservation and Water Stewardship received a Proposal dated December 21, 2011 for the construction and operation of a gasification plant at NE 9-8-12 EPM in the Rural Municipality of Reynolds. The facility will generate syngas from woody biomass feedstock.

The Department, on February 9, 2012, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Winnipeg Public Library, the Manitoba Eco-Network, the Millennium Public Library, and the Brokenhead Regional Library in Beausejour. 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 Steinbach Carillon on February 9, 2012. The newspaper and TAC notifications invited responses until March 12, 2012.

COMMENTS FROM THE PUBLIC:

There were no public comments.

Disposition:

No action required.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Canadian Environmental Assessment Agency

No concerns.

Disposition:

No action required.

Environment Canada

The following is a summary of the comments provided:

- EC recommends that the proponent note that Particulate Matter less than 2.5 microns in size (PM2.5) has been declared toxic under CEPA and a danger to human and environmental health. (Please visit the following site: <http://www.ec.gc.ca/air/default.asp?lang=En&n=2C68B45C-1> to find a fact sheet outlining the health effects of PM.)
- The proponent should also note that the following substances declared toxic under the CEPA 1999: PM 10 (Respirable Particulate Matter less than or equal to 10 microns in diameter), Sulphur Oxides (SOx), Nitrogen Oxides (NOx).
- Please see the following link for details of the National Pollutant Release Inventory (NPRI): <http://www.ec.gc.ca/inrp-npri>

Disposition:

No action necessary.

Manitoba Conservation and Water Stewardship – Air Quality Section

The following comments were provided:

- As long as the gasifier, generator and auxiliary devices (flare, baghouse filter and catalytic converter) are operated and maintained appropriately, it is expected that air emissions will not be a cause for concern.
- It is expected that the flare will be operated only during initial start-up, shutdown and during emergency to minimize emissions of VOC and PAHs.
- There is no significant concern for noise nuisance as the gasification and generators are within in a building.

Disposition

Clauses 9 to 25 of the draft Environment Act Licence address air emissions.

Manitoba Conservation and Water Stewardship – Parks and Natural Areas Branch

No concerns.

Disposition

No action needed.

Manitoba Conservation and Water Stewardship– Sustainable Resource and Policy Branch

No concerns.

Disposition

No action needed.

Manitoba Conservation and Water Stewardship – Water Stewardship Division

The following comments were provided:

- The Water Stewardship Division requires an *Environment Act* Licence to include the following:
 - The Licencee shall develop and implement an Emergency Response Plan that includes the following: in the event of a spill of a contaminant into the Whitemouth River, the owner of the Niva Falls Water Cooperative will be immediately notified.
- The Water Stewardship Division submits the following comments:
 - The Water Stewardship Division does not object to this proposal, at this time.
 - The proponent needs to be informed of the following for information purposes:
 - Erosion and sediment control measures should be implemented until all of the sites have stabilized.
 - *The Water Rights Act* requires a person to obtain a valid licence to control water or construct, establish or maintain any “water control works.” “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 a proposal advocates any of the aforementioned activities, a person is required to submit an application for a Water Rights Licence to Construct Water Control Works. A person may contact the following Water Resource Officer to obtain an application and/or obtain information.
 - A contact person is Mr. Geoff Reimer, C.E.T., Senior Water Resource Officer, Water Control Works and Drainage Licensing, Manitoba Conservation and Water Stewardship, Box 4558, Stonewall, Manitoba R0C 2Z0, telephone: (204) 467-4450, email: Geoff.reimer@gov.mb.ca.

Disposition:

Clause 42 of the Draft Environment Act Licence requires an Emergency Response Plan. The proponent has been made aware of the additional information provided by way of this Summary Report.

Manitoba Conservation and Water Stewardship – Wildlife & Ecosystem Protection Branch

No concerns.

Disposition

No action needed.

Manitoba Health

No health concerns.

Disposition

No action needed.

Manitoba Culture, Heritage, and Tourism – Historic Resources Branch

No concerns

Disposition

No action needed.

Manitoba Infrastructure and Transportation – Highway Planning and Design Branch

The following comment was provided:

- We understand that the site has an existing access road off Provincial Trunk Highway (PTH) 1. We would like to remind the proponent that, any new, modified or relocated access connection onto a PTH will require a permit from the Highway Traffic Board (including change in access use). A permit may also be required for any construction (above or below ground level), including signs, within 38.1 m (125 ft) or for any plantings within 15.2 m (50 ft) from the edge of the right of way of the PTH 1.

Disposition

This information has been provided to the proponent by way of this Summary Report.

Manitoba Local Government

No concerns.

Disposition

No action needed.

PUBLIC HEARING:

A public hearing is not recommended.

CROWN-ABORIGINAL CONSULTATION:

It has been determined that Crown-Aboriginal consultation is not required as this proposal is to establish a gasification plant at an existing development. This is an existing, developed site and this proposed additional development is not expected to affect the exercise of an aboriginal or treaty right.

RECOMMENDATION:

The Proponent should be issued a Licence for the construction and operation of gasification plant in accordance with the specifications, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Environmental Operations Branch of Manitoba Conservation.

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

Prepared by:

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