

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** The Forks Renewal Corp.  
**PROPOSAL NAME:** The Forks Composting Program  
**CLASS OF DEVELOPMENT:** 1  
**TYPE OF DEVELOPMENT:** Bulk Materials Handling Facility  
**CLIENT FILE NO.:** 5585.00

### **OVERVIEW:**

On May 11, 2012, Manitoba Conservation and Water Stewardship received a Proposal for the construction and operation of a bulk materials handling facility at South Point located at The Forks in Winnipeg. The facility will produce compost from food and yard wastes using Biovator in-vessel composting. The compost will be used for landscaping activities at The Forks.

The Department, on June 04, 2012, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Manitoba Eco-Network, and the Millennium Public Library. 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 June 09, 2012. The newspaper and TAC notifications invited responses until July 09, 2012.

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

There were no public comments.

#### **Disposition:**

No action required.

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

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

The application of the *Canadian Environmental Assessment Act* by a federal authority will not be required.

#### **Disposition:**

No action needed.

#### **Manitoba Conservation and Water Stewardship – Environmental Compliance and Enforcement Branch**

The following comments were provided:

- The proposal indicates that the operation will collect material from the Fork's and other downtown businesses with the expectation that roughly 500 tonnes of organic waste will be diverted from the Fork's waste stream. There is no mention of how much material will be accepted from other sources and what types of materials will be processed in the composter.
- The proposal states that the collected organic waste will only be stored for a maximum of 72 hrs before it is processed. There is no mention of where the organic waste will be stored, if it will be sorted prior to feeding it into the composter, or how they will determine if they have a good carbon to nitrogen ratio? Will sampling/testing be done on the finished product to determine nutrient levels and overall success of the composting process?
- The proposal states that the compost will be cured for a 2 month period following its 14 day cycle in the Biovator. Where on-site will the curing take place and what methods and/or equipments will be used to turn the pile? Where will excess compost be stored if the curing takes longer than 2 months? How will processing and timeframes be affected during the summer months versus the winter months? What will be done with excess organic waste that can't be processed for whatever reason?
- The proposed compost compound consists of the composter, fencing, and wood bunkers to separate feedstock. What are the dimensions of this compound? How much space will be utilized for organic waste collection/storage and how much space will be utilized for "curing" compost?
- According to the proposal, this site is zoned M1. Part 3 of Winnipeg By-law No. 26/2009 titled "Zoning Districts" states the following:

*"The Manufacturing Light (M1) district is intended to provide for light manufacturing, processing, service, storage, wholesale and distribution operations with all operations contained within an enclosed building with some limited outside storage." ([http://www.winnipeg.ca/ppd/bylaws/Bylaw200/By-Law\\_200.2006.htm](http://www.winnipeg.ca/ppd/bylaws/Bylaw200/By-Law_200.2006.htm) ).*

The proposal as it is currently written does not meet this specification and therefore does not meet the requirements of the zoning by-law.

#### Disposition:

The proponent provided additional information to address the concerns raised. The applicant is also notified of the city of Winnipeg by law requirement. Clauses 15 and 16 of the draft Environment Act Licence require compliance with the CCME Compost Quality Guidelines, clause 20 requires a monitoring program, clauses 13 and 24 require proper C:N ratio and sufficient carbon source on site, clause 26 requires a proper disposal of organic waste in excess of the processing capacity within 72 hours.

#### **Manitoba Conservation and Water Stewardship – Lands Branch**

No concerns.

Disposition

No action needed.

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

No concerns.

Disposition

No action needed.

**Manitoba Conservation and Water Stewardship – Air Quality Section**

The following comments were provided:

- While the proposed process is in-vessel composting and is not expected to create an odour nuisance, there are other sources of potential for odour. Storage and handling of materials for composting and the curing of the compost by-product may also generate odours. While measures to minimize odour is mentioned in the proposal, any indication that odour is occurring and has a potential to create a nuisance should be addressed immediately considering the unique location of the project.

Disposition

Clause 12 of the draft Environment Act Licence addresses odour, and clause 27 requires the proponent to develop an operations manual.

**Manitoba Conservation and Water Stewardship – Sustainable Resource and Policy Branch**

No concerns.

Disposition

No action needed.

**Manitoba Conservation and Water Stewardship – Office of Drinking Water**

No concerns.

Disposition

No action needed.

**Manitoba Conservation and Water Stewardship – Fisheries Branch**

No concerns.

### Disposition

No action needed.

## **Manitoba Conservation and Water Stewardship – Water Science and Management Branch**

The following comments were provided:

- Although the composting site is on fairly level ground and not within the Nutrient Buffer Zone, it is on the top of a hill with steep slopes leading to either the Red River or to storm sewer. As a result there is a significant risk that any leachate from the curing compost piles or the feedstock would enter surface water. To reduce this risk we recommend that the proponent either
  - Install appropriate berms to contain any leachate generated in the composting compound and additional curing area, OR
  - Construct a roof over the bunkers and additional curing area to intercept any precipitation and direct the water away from the compost and feedstock so as to prevent leachate other than that caused by precipitation/snowmelt.
- The proponent indicates a plan to apply the compost to the lawns and gardens of the Forks site. The Nutrient Management Regulation (NMR) prohibits the application of substance containing nitrogen and phosphorus (which include compost) to land within the Nutrient Buffer Zone. The Red and Assiniboine Rivers are both designated as vulnerable and therefore compost cannot be applied to land within 20m of the high water mark or the top of the outer most bank on that side of the river (15m if the buffer zone is cover with permanent vegetation). [Section 10 of the Nutrient Management Regulation W65-R.M. 62/2008].
- Other restrictions on N and P application in the NMR also apply to compost and include (but are not limited to):
  - No application to land between Nov 10 of one year and April 10 of the following year (section 12(2))
  - No discharge, release or application to impervious surfaces (10.2(1))
  - Application of compost to lawn/turf (outside the Nutrient Buffer Zone) is only permitted if the compost is generated on the property to which it is later applied. If the proponent were to begin accepting waste from offsite, the resultant compost could not be applied to lawn/turf except for the establishment of new turf or if a soil test shows that soil P is less than the limits set out in section 10.1(2).

### Disposition

The proponent provided additional information to address the concerns raised. Clauses 18 of the draft Environment Act Licence require the construction of 6 inches dyke

around the compost curing and unprocessed organic waste, and the proponent is informed to comply with the Nutrient Management Regulation when using the finished compost

**Manitoba Infrastructure and Transportation – Highway Planning and Design Branch**

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 for this project as it located on a land zoned for industrial development.

**RECOMMENDATION:**

The Proponent should be issued a Licence for the construction and operation of an organic waste processing (composting) facility in accordance with the specifications, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Environmental Compliance and Enforcement Branch of Manitoba Conservation and Water Stewardship.

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

Prepared by:

Eshetu Beshada, PhD, P. Eng.  
Environmental Engineer  
Wastewater and Mines Section  
August 22, 2012

Telephone: (204) 945-7023  
Fax: (204) 945-5229  
E-mail Address: eshet.beshada@gov.mb.ca