Appendix L
Advice Document

ADVICE DOCUMENT FOR OLYWEST FOR THE PREPARATION OF AN ENVIRONMENT ACT PROPOSAL FOR A NEW HOG PROCESSING PLANT IN WINNIPEG

BACKGROUND:

This advice document is intended to offer the proponent guidance in terms of the nature of the environmental assessment and licensing process, as well as suggested specific issues which should be addressed in an environmental assessment report. This document should not, however, be construed by OlyWest as limiting OlyWest's environmental assessment obligations under the Environment Act.

All environmentally significant proposed developments in Manitoba are regulated by The Environment Act (C.C.S.M. c. E125). Manitoba Regulation 164/88 under this Act sets out the types of developments which are automatically subject to an environmental assessment (EA) and licensing process prior to their construction, and operation, as well as any subsequent major alteration. Pursuant to this regulation, OlyWest's project is captured as a "meat processing and slaughter plant" development, being a Class 1 Development, which hereafter in this document will simply be referred to as a meat processing plant (MPP). For a Class 1 Development, an application fee of $500 must accompany the proposal filed under the Act.

Given the understanding that OlyWest intends to direct pretreated wastewater into the City of Winnipeg's existing sewerage system, then OlyWest will be expected to enter into an Industrial Service Agreement with the City of Winnipeg, and to supplement their Proposal with a signed copy of that Industrial Service Agreement. It would be expected that the Agreement would outline a schedule addressing: the rates of release of wastewater; maximum permissible pollutant loading rates; and any other critical wastewater characteristics, as may be deemed necessary by the City of Winnipeg to protect the design capacity of their sewage collection system, as well as to protect the performance of their North End Pollution Control Centre (NE-PCC) relative to the City of Winnipeg's obligations under their Environment Act licence No. 2684 R. Either OlyWest or the City of Winnipeg will have to address the environmental impact of the additional wastewater, including nutrients, on the receiving environment during the time

period before the City of Winnipeg upgrades the NE-PCC for full nutrient removal by 2015

In order to satisfy the intent of Manitoba's environmental impact assessment requirements in an efficient manner, an interdepartmental Technical Advisory Committee (TAC) has been established to provide advice and guidelines for the assessment of potential environmental effects and the preparation of an appropriate Environmental Assessment (EA) report, and to review and evaluate the EA report that will be submitted by OlyWest. The TAC consists of technical staff of provincial departments and agencies having a significant interest or role in land use planning under the Planning Act and environmental reviews under The Environment Act.

Federal representation is also included on the TAC as a matter of protocol, by agreement between the Province of Manitoba and the Federal Government through the "*Canada-Manitoba Agreement on Environmental Assessment Cooperation*". The agreement facilitates a cooperative approach to the review of proposed projects where both the provincial and the federal jurisdictions have a legislated interest in the environmental assessment and review of such projects. Where the nature of a proposal (such as the involvement of federal funding) triggers or may trigger the need for a federal EA under the *Canadian Environmental Assessment Act* (CEAA), specific federal EA requirements will need to be addressed. In this regard, both the federal and provincial EA requirements can now be addressed through the preparation of a single EA report and through a single review process. OlyWest may want to consult with the Canadian Environmental Assessment Agency to determine whether or not their contemplated project may trigger the need for a federal EA, so as to incorporate into the EA such additional federal requirements as may be identified through that preliminary consultation.

During the EA process and the preparation of the EA report, OlyWest is urged to work closely with the TAC assembled for the project. This committee can provide OlyWest with any required interpretation of this advice document, and can provide on-going feedback to OlyWest concerning the content and methodology of the assessment. In this way, any problems or new issues that were not accounted for in the EA guidelines can be dealt with, and OlyWest will have the opportunity to fill in deficiencies as the assessment is proceeding rather than after it has been completed.

OlyWest is also strongly encouraged to undertake a public consultation process with local citizens, aboriginal communities and environmental interest groups that may be affected by, or be concerned with the proposed development so as to:

provide a clearer awareness or understanding of the proposed Development; to receive feedback on the environmental issues of particular importance to the potentially affected or concerned parties; and to respond, whenever possible, to questions raised by the consulted parties.

Any proposed wastewater handling, storage or treatment process must be designed by, or recommended by, professional engineers possessing appropriate experience.

Persons conducting and interpreting the EA shall have an appropriate combination of formal education, skills, experience and training to conduct a technically sound and rational EA.

ENVIRONMENT ACT PROCESS:

The steps of processing a proposal before OlyWest can obtain an Environment Act Licence will be as follows:

- A written Proposal must be submitted to Manitoba Conservation, to the attention of the Director of the Environmental Assessment and Licensing Branch. The basic information required to complement a Proposal is set out in Regulation 163/88. This Advice Document is intended to assist OlyWest in ensuring that the EA report accompanying the Proposal is as complete as possible, with particular emphasis placed on the scope of the EA report.

- Upon receipt of the Proposal and the EA report, and the Director being satisfied that the Proposal is complete, the Proposal and the EA report will be deposited with the local and central Public Registries and will be advertised in local newspapers. This will be done by the Director within 30 days of receipt of the complete Proposal. Given that the Minister of Conservation is committed to requesting the Clean Environment Commission (CEC) to hold a public hearing on the Proposal, the advertisement will also formally advise the public that a public hearing of the CEC will be held to consider the Proposal, and that anyone likely to be affected by the Proposal and wishing to make a representation, either against or for the Proposal, would have to serve notice to that effect, in writing, within 30 days of the date of the advertisement.

- Concurrently, a review of the Proposal and the EA report by the inter-departmental TAC will be initiated by the Director for their comments and concerns within 30 days of the date of advertisement.

- Public hearings held and conducted by the CEC at the request of the Minister of Environment are carried out for the purpose of providing advice to the Minister, as a component of the Department's assessment of the Proposal. The public hearing will be held only after a reasonable time has elapsed for the public to review the Proposal and the EA.

- An Environment Act licence with appropriate limits, terms and conditions would be considered by the Director after the public and TAC have had an opportunity to review the Proposal and submit their comments and recommendations, and after the receipt of the CEC's recommendations that would be submitted to the Minister of Conservation subsequent to the completion of the public hearing.

- Upon the completion of the assessment process, the Director may refuse to issue a Licence, and would so inform all parties concerned within 30 days of that decision.

OR

- Upon the issuance of a Licence, there will follow a 30-day period during which an appeal can be made to the Minister of Conservation by any party affected by the issued Licence.

ENVIRONMENTAL ASSESSMENT GUIDELINES:

The purpose of these EA guidelines is to provide OlyWest with an outline of the information that the Director requires to make a licensing decision. This document is intended to provide the recommended scope of the required EA report.

In order to assess the future impact of the construction and operation of the proposed Development, it is necessary to establish a current environmental baseline of the environmental conditions at the proposed site and in the receiving environment.

Whereupon the EA report produced as a result of the assessment process is lacking any of the requested information, OLywest should clearly document the missing information and the rationale for not being able to provide it in the EA report. However, where certain lacking information is deemed necessary by the Director for determining the significance of potentially critical impacts of the Development, such a critical data gap will delay the licensing of the Development.

The EA report should include the following components:

1. Introduction

Describe the nature and scope of the Proposal, together with the rationale and objectives for the proposal.

2. General Site Description

Describe the proposed site of the Development, its physical and environmental setting, and identify human, flora and fauna receptors and background environmental quality of the surrounding potentially impacted area.

Factors to address should include:

- surface and subsurface soils and geology extending to and including the zone of the local upper aquifer;
- groundwater conditions at the site, including the groundwater quality, direction and rate of groundwater movement in the local upper aquifer, and extent of groundwater use at the proposed site and in the local area;
- topographic information and facility elevation relative to normal and high (flood) water levels in adjacent waterways and bodies of water;
- surface drainage patterns in relation to any immediate drainage ditches, natural surface waterways and water bodies;
- the relative location of the site to local natural resource uses, agricultural uses, and to any other developments that may be potentially impacted by this Development;
- local land and water features and background quality, particularly sensitive land and water features, including available information on the flora and fauna that may be impacted by the Development;
- available monthly statistical information on the local meteorology (i.e. wind speed and direction, temperature, precipitation and evaporation);

- regional demographic features including population density, transportation patterns, schools, institutions, and other high-density situations, and sensitive populations;
- upon specific request, base line health status respecting potential illness outcomes directly related to liquid discharges or air emissions from the Development;
- the existing background ambient air quality, and existing ambient fluctuations in noise levels; and
- other existing sources of emissions or discharges that may impact the same shared environment.

This Section should be complemented with:

- a scaled site plan of the proposed property for the Development, showing all the major structures and features in relation to the legal property boundaries;

- a scaled area plan depicting the land use designation and zoning boundaries of the proposed site of the Development and the surrounding local developed areas;

- scaled regional area maps, encompassing an area within 10 kilometres radius, and another within 3 kilometers radius of the site of the proposed Development, identifying:
    - the locations of existing demographic features (residential, schools and daycare centres, institutional, commercial, industrial, and transportation patterns), and proposed features that are being proposed by the local planning program;
    - existing versus proposed truck traffic routes;
    - resource use areas that may potentially be impacted by the construction and operation of the proposed Development and/or impact the same shared environment within this area; and
    - any existing or proposed ambient air and water quality(surface and subsurface) monitoring stations;

- a topographic plan of the proposed site for the Development, showing elevation contours, the surface runoff drainage pattern and major drainage release points to local drainage ditches, waterways and water bodies;

- scaled area maps identifying any proposed sludge management areas, if applicable, along with the locations of proposed ambient air and surface run-off monitoring stations; and

- vertically scaled well logs, or scaled stratigraphic profiles, depicting the depth and types of subsurface soils and the water table elevation of the local upper aquifer in the affected area(s).

3. Plant Site Description

Describe the proposed MPP, any associated on-site wastewater pretreatment and rendering facilities, and any major off-site treatment facilities to be associated with the management of waste substances from this Development. In describing the MPP and associated facilities, address in detail the following items (where applicable):

- overall MPP site layout;
- road and rail access infrastructure;
- power transmission lines;
- other utility lines;
- storm water, process wastewater, sewage, sludge and solid waste holding or conveying facilities;
- hog holding pen facilities;
- liquid waste pretreatment facilities;
- pretreated wastewater quality and quantity monitoring facilities;
- input/output storage areas for fuels, chemicals and petroleum products, etc.;
- input/output storage areas for collected blood;
- locations of on-site and off-site storage and/or disposal areas used for any solid and/or sludge wastes, and general garbage (distinguish between those off-site facilities which are and are not operated by OlyWest);
- point source air emission control facilities;
- fugitive air emission minimization techniques; and
- point source air emission monitoring facilities.

Describe the proposed construction schedule.

This Section should be complemented with appropriate scaled site plans and figures which illustrate the locations and relevant details of the above items and highlight the physical changes (location and detail) which will occur to existing facilities or infra-structure through the proposed Development.

4. Process Descriptions

Describe the proposed processes at the Development, including such information as:

- a functional description of the MPP's processes, including the rated capacity of each major process stage and any projected changes to the rated capacities anticipated for the future;

- production and pollutant handling/treatment process flow charts; and

- a functional description of the pollutant handling, pretreatment and treatment processes and facilities, along with their design capabilities and limitations in regards to their ability to contain, treat, reduce, or otherwise manage air emissions, liquid pollutants, sludges, hog manure, unrendereable substances and general solid wastes.

Where proprietary process information is provided, such information must be identified as being proprietary, and shall remain confidential unless waived in writing by OlyWest.

5. Inputs/Outputs

Describe the proposed inputs to, and outputs from, the processes described in Section 4 above. All descriptions should relate to quantifiable characteristics, where possible.

Respecting inputs:

- describe all inputs (i.e. livestock, water, fuels, chemicals reagents, etc.) directed into the production processes, the pollutant treatment processes, as well as utilized by on-site support services, quantified at the estimated daily peak and daily average production rates;

- describe and rationalize the adequacy of the hog holding pens in terms of their holding capacity to adequately accommodate the continuing influx of delivered hogs, without causing overcrowding or any spill-over of delivered hogs into the outdoors;

- describe the type and location of the water metering devices to be used to monitor the rate of water use on an ongoing and cumulative basis;

- where any inputs to the Development, whether or not directly related to the processes, are Dangerous Goods as described in Regulation 282/87 (and any amendments thereto) of the Manitoba Dangerous Goods Handling and Transportation Act, identify all such dangerous goods by their: shipping name, class, PIN (product information number), packing group, storage location on site, storage vessel type, material and size, secondary containment provision (yes/no), annual mass/volume received, maximum quantity on site at any time, and their likely vector for accidental release to the environment, with specific Material Safety Data Sheets or their equivalent to be made available upon request; and

- include a discussion on the procedures to be followed with respect to:
  - good housekeeping measures;
  - regular inspections;
  - spill prevention measures;
  - spill containment, recording , and reporting of any dangerous goods used at the site of the Development; and
  - preparation and maintenance of an emergency response plan.

<u>Respecting outputs:</u>

- identify all the pollutants that will be generated, treated, rendered, stored, discharged, emitted, land applied, or otherwise managed or disposed of in connection with the various processes and activities at the site of the Development;

- such pollutants and their exposure levels should be identified for each phase of the development including construction, start-up, normal operation, and process upset conditions (i.e. fire, accidental spills or releases, hog or waste substances transportation accidents) and upon decommissioning. Wherever possible, the information should be based on daily peak and daily average production rates, and on previous operating experiences with other similar Developments, pertaining to:

  - Emissions to the atmosphere, including:
    - identification of all air emission sources, including:
      - the identification each source by location;
      - the characterization of each source of air emissions by the expected chemical constituents or associated odour or noise;
      - the proposed odour management program;
      - the proposed noise management program;

  - the proposed air emission reduction program for potential air pollutants;
  - the expected post-treatment chemical concentrations, volumetric and pollutant loading emission rates, and other measurable levels of pollutants as to their gaseous, particulate, noise and odour characteristics (based on reliable literature or from actual operating data from other similar facilities, except that, if emission factors are used to determine the emission rates, these emission factors should be justified);
- a comparison of the quality of the expected air emissions to applicable air emissions standards, guidelines and codes of practice as published by CCME, Environment Canada, or US EPA 40 CFR Part 60;
- the characterization and quantification of atmospheric greenhouse gas emissions, NO_X, VOC and other ozone precursors emissions, acid precipitation precursors, and water vapour;
- the contribution of the trucking activity to be associated with the proposed Development in terms of the added air pollutants, noise and dust along the proposed trucking route within populated areas, and measures proposed to mitigate these effects.

- Blood collection and management, including:
  - the quantification of the volume of blood expected to be collected on a maximum and average daily production level as well as a maximum and average weekly production level;
  - the probable quantity of blood lost to the sewers, and how that will be minimized in consideration of its high phosphorus content;
  - the manner in which the collected blood will be managed;
  - the backup contingency plan(s) in the event that for any reason the normal blood management plan cannot be utilized.

- Wastewater discharges, including:
  - the quantification and likely characterization of the pre-treated process wastewater to be directed off the property and into the City of Winnipeg's sewerage system leading to their NE-PCC as to maximum and average daily and also the maximum and

    average weekly discharge rates and loading rates for: COD; $CBOD_5$; total nitrogen, total phosphorus; and total oil and grease; and
  - a breakdown on monthly variations, if applicable;

- the likely levels of endocrine disrupting compounds which may be released to the City of Winnipeg's sewerage system;

• Surface runoff discharges to storm sewers, including:
  - identification and quantification of all major surface runoff sources, the pollutants which they may accumulate and transport off the property, and the precautions that will be taken to minimize the potential transport of pollutants into the storm sewers;
  - design capacities of any collection and containment facilities that may be proposed for polluted run-off expressed quantitatively as well as in terms of precipitation event probabilities (i.e. 1 in 25 yr., 1 in 100 yr., etc.).
• Solid and sludge wastes, including:
  - the characterization, quantification and fate of such wastes as hog manure, non-renderable animal wastes, sludges from the wastewater pretreatment facility, dead-on-arrival hogs, general garbage, etc., as would be generated, stored, managed and/or disposed of; and
  - how sludges targeted for land disposal would be managed, with particular focus on winter and high precipitation periods, the establishment of acceptable and sustainable rates of application, odour management, and the proposed follow-up soil monitoring program.

• Other wastes, including:
  - hazardous waste as defined in Manitoba Regulation 282/87 (and any amendments thereto) of the Manitoba Dangerous Goods Handling and Transportation Act; and
  - other miscellaneous liquid, solid or sludge wastes not captured above.

(Quantification of the attributes and the amounts of pollutants released into the environment is considered essential).

- identify all the bi-products or recyclable substances which will be generated and how they will be collected, stored and further managed (e.g. animal hides, renderable animal blood, renderable solid or sludge animal wastes);

- identify the degree of recycling and waste minimization or re-utilization practices being proposed, and emphasize any proposed innovations to the Development's processes which are expected to result in increased levels of recycling and waste minimization or re-utilization above and beyond that normally achieved at other similar Developments with regards to water use, energy use and waste management; and

- include such information as materials balances and water balances under daily peak and daily average production rates.

6. Environmental Impact Assessment

The intent of the environmental impact assessment is to identify the potential environmental, environmental health and socio-economic impacts from the Development. The required environmental impact assessment will involve the following steps:

- Identify all of the sources of both probable and certain impact (whether positive or negative) related to the proposed pollutant releases and activities, both during the construction phase and the operating phase.
- Identify the magnitude and duration of these impacts by describing them as major or minor impacts (together with the basis for such determinations), direct or indirect impacts, short-term or long-term impacts, and the frequency and time frame in which these impacts will occur in the future, and which impacts would be reversible. Estimations should be made of the effects upon the receptors, whether direct or indirect, as a result of the expected air pollutant, odour and noise emissions, the disposal of solids and sludges, the direct and indirect management of the wastewater, and elevated or new traffic patterns.
- Evaluate and interpret the potential impact of all the sources of impact for each "Impact Category" described below.
- Evaluate the worst case scenarios of the impacts and their probability of occurrence.
- Support assessment conclusions and statements with data or modeling information.

- Where computer models will be utilized to predict the impacts from air emissions, the appropriate model and modelling parameters will depend on the site parameters. Discussion with Manitoba Conservation must take place to ensure that the model being considered for use is acceptable, and that the modelling output will satisfy the intent of the

environmental impact assessment. The impacts on the environment should include the human impact of nuisance and annoyance caused by any emissions, discharges or traffic changes.

Impact Categories

a) Environment, particularily regarding:
   - surface water and fish and other aquatic organisms and the habitats that support them;
   - groundwater;
   - air;
   - soils; and
   - nearby environmentally sensitive areas.

Respecting any impacts on surface water, and since the pretreated wastewater from the MPP will be directed to an off-site wastewater treatment facility, being the City of Winnipeg's NE-PCC, OlyWest will be expected to have the City of Winnipeg address:

1) how the City's acceptance of OlyWest's pretreated wastewater will impact their ability to comply with their Environment Act Licence No. 2684 R;
2) how the City will handle the additional loadings of total nitrogen and total phosphorus prior to the City upgrading the NE-PCC before 2015;
3) the impact of additional quantities of combined sewer overflows (if OlyWest's effluent is to be discharged into a combined sewer area) that could be expected to be bypassed to the Red River due to a resultant displaced capacity within the impacted combined sewage collection systems due to the additional wastewater releases from OlyWest; and
4) the potential presence, fate and significance of impact on aquatic life of any levels of endocrine disrupting compounds that may be deposited by OlyWest into the City's sewerage system or otherwise caused to be by-passed to the Red River.

Respecting groundwater, this may involve impacts on the groundwater at the plant site due to spills or slow seepages of liquid pollutants.

The impacts on air quality due to air emissions identified in Section 5 should include:

- the peak daily, the monthly average, and the processing plant's annual average projections on the existing ambient air quality

beyond the plant site for all pollutant releases, with each case compared to applicable ambient ambient air quality criteria available from Manitoba Conservation, Ontario Ministry of the Environment, and the CCME;
- the impacts of the atmospheric greenhouse gas emissions from this development, expressed in terms of annual mass and annual percentage of the total estimated greenhouse gas emissions generated in Manitoba (as provided by Manitoba Conservation);
- the impacts of odour and/or noise releases from the proposed development upon the affected public; and
- the broader impacts of the whole spectrum of air emissions relative to acid rain, ozone depletion, water vapour, vegetation, soil residuals, local nuisance conditions, cumulative effects, etc.

The impacts on soils would pertain principally to any proposed program involving land disposal of any manure and sludges generated at the MPP. This would also involve the surface run-off of liquid pollutants or the migration of pollutants or nutrients past the root zone of the target vegetation.

b) Land Use

This involves assessing the impact of location and operation of the Development relative to the local land use planning program, regarding:
- compatability of the Proposal to the existing area zoning; and
- the proximity of the proposed Development to other businesses; etc.

c) Natural Resource Uses

This involves assessing the impact of operating the Development on the current use or identified future use of water and land based resources, including but not limited to:
- surrounding lands, especially those having designated uses (i.e. agricultural, residential, commercial, parks, etc.);
- existing natural resources such as groundwater used by any authorized residents, institutions, or industries sharing the same aquifer;
- existing natural resources such as irrigation water used by downstream authorized waterway users;
- existing natural resources such as drinking water used by downstream communities; and

- existing natural resources such as fisheries, wildlife, forests and other habitat.

d) Traffic Pattern Changes
This involves assessing the impact by the Development upon the comfort, well being and livelihood of the residents, institutions and commercial operations located along the main transportation and haulage roads proposed to serve this Development, as well as any added potential risk to safety due to any increased traffic brought about by operating the Development. (Should be supported with maps of the preferred truck traffic route(s) versus other optional routes that might impart less impact upon neighbouring residents).

e) Environmental Health
This involves assessing the health risks of pollutants released through the operation of the Development on the environmental health of neighbouring human receptors. Included should be the risks of cancer, gene mutation, or birth defects to humans from all emissions and discharges beyond the Development's property, as well as other acute and chronic health and personal well-being risks associated with potential airborne emissions, noise, odours, and waterborne discharges.

f) Socio-economic
This involves assessing the positive and negative socio-economic implications resulting from the environmental impacts identified through the preceding assessment sub-sections 6(a), 6(b), 6(c), 6(d) and 6(e), and need not be restricted to a 10 kilometre distance from the site of the D.

7. Mitigative Measures for Construction and Operation

Describe the measures and/or technologies that will be implemented to prevent, mitigate or eliminate the impacts identified in the course of the environmental impact assessment. Discuss the expected effectiveness of the mitigative measures. Anticipated residual impacts, which will remain after all reasonable mitigation measures have been undertaken, need to be identified, and their significance assessed, together with an explanation of how significance was concluded. Mitigative measures may include changes in design, chemical reagents or other capital measures, as well as non-capital measures such as changes in process or layout of the process train, improved recycling, scheduling and other practices.

Where potential impacts have been identified and no mitigation is contemplated, an explanation is required.

Identify alternative technologies which could mitigate the impacts, together with the reasons for which they were or are rejected.

Describe the proposed environmental management practices to be employed to prevent or mitigate adverse implications on environmental health. As well, describe any mitigation that could be used if, once the Development is operational, the residual impacts are found to be higher than initially predicted, and are deemed to be unacceptable.

8. Contingency Planning

For acute situations, describe contingency planning (and where possible, actual plans) to be applied in the event of a non-routine occurrence which could adversely affect the environment, public health or safety. Include consideration of the following:

- malfunction of process equipment;
- malfunction of emission control equipment or wastewater pretreatment facilities;
- fire;
- accidental spills or releases of dangerous goods or hazardous wastes;
- transportation accidents;
- extreme rainfall events which may tax the City of Winnipeg's management of their combined sewer overflows; and
- level of risk and potential consequences of pollutants transported by floodwater, and if applicable, measures to mitigate the associated impacts.

For chronic situations such as:

- an extended disruption of the wastewater pretreatment facilities; or
- an extended disruption of an on-site or off-site rendering facility;
- an unplanned disruption in the use of the City of Winnipeg's sewage line.

9. Proposed Environmental Monitoring

Describe the proposed environmental monitoring facilities, the parameters proposed to be measured, the rationale for selecting these parameters, and the

frequency of measurement proposed for obtaining statistically valid monitoring data on the following:

- point source particulate and gaseous emissions;
- ambient environmental quality:
  - air quality (particulate, gaseous, volatile organics, odour and noise respecting air emissions);
  - groundwater (up gradient and down gradient);
- liquid effluent released from the on-site wastewater pretreatment facility;
- groundwater, if subject to potential impact;
- plant site property surface runoff; and
- chemical accumulation and leaching associated with soils affected by the application of biosolids to land (if applicable).

Provide drawings showing all the proposed sampling locations, along with associated sampling facilities, for the collection of: pretreated wastewater; potential surface run-off locations (if applicable), groundwater and groundwater control stations; and point source air emissions and ambient air samples.

Outline the proposed techniques and equipment to be used for collecting the samples, and for measuring the volumetric rates of discharge of stack emissions and major wastewater streams.

10. Decommissioning

Elaborate on the life expectancy of the proposed Development and the projected plans concerning the eventual decommissioning of the Development, including all waste storage or treatment facilities.

11. Principles and Guidelines for Sustainable Development

Address each of the seven principles and six guidelines for sustainable development, listed in the “The Sustainable Development Act”, by providing a summary paragraph on each principle and guideline, describing how the Proposal endeavors to address each respective principle and guideline.

12. Public Participation

Describe the program of public awareness and participation which has been undertaken in the preparation of the Proposal respecting the construction and operation phases of the proposed Development. Include the results of that

public participation in the Proposal, and outline the measures proposed to address the identified issues. If such a program has not been undertaken, this should be stated together with an explanation as to why not.

13. Technical References

All assessment conclusions should be backed up by credible technical or scientific information. Previous studies and reports may be utilized if they still have relevance. Properly referenced information could include:

- technical studies of similar facilities and processes which are operating elsewhere;
- original studies performed by qualified engineers, scientists and other professionals commissioned by OlyWest specific to the proposed facilities;
- facility design documents as prepared by qualified engineers; and/or
- peer reviewed scientific reports and papers on topics relevant to the facility.

Deficiencies in the technical or scientific evidence should be clearly delineated. All null impact conclusions must be supported by credible analysis and documentation.

14. Report Format

The EA should include an executive summary and should be written with a minimum of technical jargon. Where highly technical portions are essential to the document, definitions or explanations should be included. A glossary of terms should also be provided.

The information presented in the document should maximize the use of maps, charts, diagrams, and photographs to present the information. Maps and diagrams should preferably be presented at a common scale, wherever possible, to allow direct overlay for ease of reference.

OlyWest's Proposal will be the subject of a CEC public hearing. As such, at least 40 printed copies of the Proposal and EA report will be required to be

submitted for distribution. It is also recommended that OlyWest arrange to place a complete copy of the Proposal and EA report onto a CD, in pdf format so as to accommodate the accessing of that information on a departmental website. Please note, however, that in order to facilitate the placement of the

information onto the department's website, the information must be broken down into individual pdf files each being less than 2 megabytes in size, with each file's name being short and continuous (unbroken with a space).

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