

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: HD Graphics Inc.
PROPOSAL NAME: HD Graphics – Screen Printing Company
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Manufacturing -
CLIENT FILE NO.: 5691.00

OVERVIEW:

Manitoba Conservation and Water Stewardship received a Proposal on March 14, 2014 for the continued operation of a screen printing facility at 21105 Mondor Road, SE 15-9-4 EPM in Ile Des Chenes, Manitoba. The facility manufactures screens and digitally printed signs, decals, banners, T-shirts, hats etc distributed all over North America.

The Department, on November 13, 2014, placed copies of the Proposal in the Public Registries located at Legislative Library (200 Vaughan Street), the Winnipeg Millennium Public Library in Winnipeg and online at <http://www.gov.mb.ca/conservation/eal/registries/5691hdgraphics/index.html>. 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 November 15, 2014. The newspaper and TAC notifications invited responses until December 16, 2014.

COMMENTS FROM THE PUBLIC:

No Comments.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Canadian Environmental Assessment Agency

No Comments.

Manitoba Agriculture – Land Use Branch

No Response.

Manitoba Conservation and Water Stewardship –Compliance and Enforcement Branch

Environmental Compliance and Enforcement Branch has reviewed the above noted Environment Act Proposal dated March 12, 2014 and has the following comments to provide:

*The sewage ejector system is receiving wastewater generated from the house, a washroom in the shop, and process water from the shop. A sewage ejector is, as defined in the Onsite Wastewater Management Systems Regulation (M.R. 83/2003), to be used **exclusively** for the disposal of:*

- *Human fecal or urinary waste and other human body and toilet waste (“sewage”); and/or*
- *Liquid waste from a dwelling or other building produced by bathing, laundering, or food preparation activities (“greywater”)*

Additionally, as per Schedule E of M.R. 83/2003, a sewage ejector shall not be connected to more than one single-family dwelling and shall be located in such a location that will ensure that wastewater effluent discharged from it does not pond.

Use of the sewage ejector to dispose of process water is a contravention of M.R. 83/2003.

Most of the chemicals identified in this proposal are biodegradable with the exception of the textile and graphic inks. The Certificate of Analysis (L1429878) provided for the effluent does not contain all components included in the Materials Safety Data Sheets (MSDS). The MSDS of the inks indicate that some of these chemical products should not be released into the environment.

Environmental Compliance and Enforcement Branch requests that the proponent propose an alternative method to dispose of the process wastewater that will avoid the release of potentially hazardous products to the environment.

Proponent Response (January 15, 2015)

As per our phone conversation on the phone, here is the info you have requested on the ECE form:

All of the waste water from HD Graphics Printed processes, including all chemicals, and inks is now being filtered through the close looped filtration system that we provided information on in our proposal. It is not connected to the Ejector system. The specs and information on that system were provided in our proposal, it was built by “The Water Doctor” company.

There are a series of carbon filters that are attached to the system that “The Water Doctor” company will be taking care of cleaning and having the waste disposed of by millar environmental, allowing HD to continue operations with no waste discharging through our ejector system.

The items outlined in the ECE that are acceptable to be disposed of through the Ejector system is now all that is being disposed of.

Environmental Compliance and Enforcement Branch Comments (February 3, 2015)

Most of our concerns are addressed. There are still issues with more than a single family dwelling connected to sewage ejector system, however, as process wastewater is no longer routed to the system, we can follow that up separately from the EAL.

Disposition

The proponent addressed the concern raised. Environmental Compliance and Enforcement Branch has reviewed the response has no further comment. In addition Clause 27 of the draft Environment Act Licence prohibits the discharge of process wastewater through an ejector system.

Manitoba Conservation and Water Stewardship – Programs and Strategies Branch – Air Quality Section

Air Quality Section has reviewed the above proposal and provides the following comment:

- Based on the provided annual use of chemicals, it is expected that there will be no significant impact on air quality due to VOC emissions from this facility.
- The odour clause is suggested to be included in the License.

Disposition

Clause 9 of the draft Environment Act Licence addresses odour nuisance.

Manitoba Conservation and Water Stewardship – Wildlife Branch

No Response

Manitoba Conservation and Water Stewardship – Parks and Protected Spaces Branch

Parks and Protected Spaces Branch has reviewed the proposal submitted pursuant to the Environment Act for EAP HD Graphics File: 5691.00. The Branch has no comments or concerns to offer as it does not affect any provincial parks, park reserves, ecological reserves, areas of special interest or proposed protected areas.

Manitoba Conservation and Water Stewardship – Forestry Branch

No Response.

Manitoba Conservation and Water Stewardship – Aboriginal Relations Branch

No Response.

Manitoba Conservation and Water Stewardship – Lands Branch

No Concerns.

Manitoba Conservation and Water Stewardship – Water Quality Management Section

No Response.

Manitoba Conservation and Water Stewardship – Groundwater Management Section

No Response.

Manitoba Conservation and Water Stewardship– Fisheries Branch

No Response.

Manitoba Conservation and Water Stewardship – Office of Drinking Water

No Concerns

Manitoba Conservation and Water Stewardship– Water Use Licensing Section

No Concerns.

Manitoba Conservation and Water Stewardship – Water Control Works Licensing Section

No Response.

Manitoba Conservation and Water Stewardship– Climate Green Initiative Branch

No Response.

Manitoba Municipal Government – Community Planning Services Branch

No Response.

Manitoba Culture, Heritage and Tourism – Heritage Branch

No Response.

Manitoba Municipal Government – Energy Division

No Response.

Manitoba Municipal Government – Petroleum Branch

No Concerns.

Manitoba Infrastructure and Transportation – Flood Forecasting Branch

No Response.

Manitoba Infrastructure and Transportation – Highway Planning and Design Branch

No Concerns.

Manitoba Intergovernmental Affairs

No Response.

Manitoba Health – Environmental Health Unit

No Response.

Manitoba Labour – Office of Fire Commissioner

The Office of the Fire Commissioner recommends that the proponent submit an updated Fire Safety Plan to the RM of Ritchot Fire Department, as part of the licensing requirement.

Disposition

The proponent is notified of the recommendation to submit an updated fire safety plan. In addition the Licence cover letter will remind the licensee of the need to comply with any other legislative requirements.

Manitoba Labour – Work Place Safety & Health

No Response

PUBLIC HEARING:

A public hearing is not recommended.

CROWN-ABORIGINAL CONSULTATION:

The Government of Manitoba recognizes that it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise

of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

This facility is an existing printing facility located on a private land. There would be no infringement of aboriginal or treaty rights under Section 35 of the Constitution Act, 1982. Therefore, it is concluded that Crown-Aboriginal consultation is not required for the project.

RECOMMENDATION:

The Proponent should be issued a Licence for the continued operation of a screen printing 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:

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