



DATE: October 2, 2018

TO: Eshetu Beshada PhD, P.Eng.
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Environmental Approvals Branch
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FROM: Julie Froese/Krista Olafsson/ /Alvin Dyck/Nada Suresh
Environment Officer
Environmental Compliance and Enforcement
Manitoba Sustainable Development,
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Winnipeg MB R3H 0W4

SUBJECT: Comments on Additional Information Request – Rakowski Recycling (File No.5699.00)

Manitoba Sustainable Development, Winnipeg Regional Office of Environmental Compliance and Enforcement Branch has reviewed the above noted additional information regarding the Environmental Act Proposal (EAP) for the proposed operation at 454 Archibald Street, Winnipeg, and has the following comments to provide:

1. Noise: It is noted that the sound assessment measured from various points, including the source, fenceline and the nearest residence. No further measurement points were taken in the residential neighbourhood, so full impacts of noise on the residential neighbourhood may not be reflected in the assessment.
2. Noise: It is noted that the sound assessment concludes that “sound levels generated by equipment appear to be in compliance with the City of Winnipeg Zoning By-Law and the Neighborhood Livability By-Law”. Has the assessment been reviewed or is it to be reviewed by the City of Winnipeg zoning and by-law officials?

Beshada, Eshetu (SD)

-----Original Message-----

From: Richards, Lisa (WRHA)

Sent: September-26-18 4:22 PM

To: Beshada, Eshetu (SD) <Eshetu.Beshada@gov.mb.ca>

Cc: Labossiere, Don (SD) <Don.Labossiere@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Chang, Heejune (WRHA) <hchang@wrha.mb.ca>; Isaac, Michael (HSAL) <Michael.Isaac@gov.mb.ca>

Subject: RE: File No. 5699.00 Rakowski Recycling - EAP Additional Information

Hi Eshetu. A couple of comments about this submission:

1) Noise

I am pleased that a noise survey was done in response to my concerns about the proximity of this development to a residential area. I have an ongoing concern with the noise impacts of this recycling facility in the Mission Industrial Area, in the context of the health impacts that the community is experiencing. The most common effect of community noise is annoyance, which is considered an adverse health effect by the World Health Organization. In a typical community, noise starts to make people highly annoyed when the sound level outside their home is around 55dBA. High annoyance (HA) with noise is currently a reliable and widely accepted indicator of human health effects due to environmental noise.

Health Canada has some guidelines on assessing noise in EIAs, which do not appear to be followed in this submission. The consultant's noise survey did not measure both a day and night baseline measurement, nor did they calculate a change in %HA (the potential for change in the sound environment due to any project activity). There are numerous other omissions, including the absence of a noise management and monitoring plan, leading me to believe we should ask them to resubmit after following HC's guidelines:

http://www.gov.mb.ca/sd/eal/archive/2012/summaries/5471_appendix2.pdf

The noise survey indicates that there is noise present in the community that exceeds Health Canada's threshold value of 55 dBA. I think we need to address this further with respect to cumulative impacts:

If the proposed project is in a region where there are other proposed or ongoing development projects that may contribute to noise levels, a cumulative effects assessment is an important consideration and is advised in the EA. In attempting to predict sound levels from the project when contributions from other sources are possible, Health Canada advises that these sources be included in the modelling to establish potential cumulative effects.

In selecting a baseline for a cumulative effects assessment, Health Canada advises that the pre-project baseline is the most appropriate comparison for noise-related human health impacts as this comparison is predictive of the absolute change in the noise environment when all project and additional noise sources are considered.

Guidance on how to conduct a cumulative effects assessment in EAs, which is a requirement under CEAA, is available from the Canadian Environmental Assessment Agency's Operational Policy Statement: Addressing Cumulative Environmental Effects under the Canadian Environmental Assessment Act (2007); and Cumulative Effects Assessment Practitioners Guide (1999).

Health Canada has some guidelines on assessing cumulative impacts, and my feeling is that further development in the Mission Industrial Area (and other heavy industrial areas adjacent to residential areas), including this proposed development, needs to be subject to complying with Health Canada's cumulative effect guidelines:

2) Plasma torch use

I have received feedback from Don's group indicating that plasma torches have been used at Rakowski. As indicated in their letter, it is possible that they have discontinued their use. Not sure how we could verify this information, other than a spot inspection. However, could we prohibit the use of plasma torches in the license just to cover all of our bases? If they are using plasma torches, I think we would need to be requiring air quality testing and ongoing monitoring.

3) M2 definition of use

According to the bylaw, the M2 zoning of "light manufacturing" should not be creating noise by its definition, which leads me to wonder if Rakowski's recycling operation actually fits within the M2 use.

In summary, I am raising these concerns and requesting that we ensure that we are getting a more robust EIA in the area of health effects because of the ongoing community health impacts in the area. I hope we can work together (with Susan's input) to address the cumulative impact of the noise (and air quality, which may or may not be a significant impact with this particular development) of industry in the area on a go forward basis.

Thanks,

Lisa

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