

DATE: June 26, 2018

TO: Tania Steele

FROM: Eshetu Beshada, Ph.D., P.Eng.  
Environmental Engineer  
Municipal and Industrial Section

SUBJECT: **File 5699.00 – Rakowski Recycling. – Information for Public Registry**

Tania,

Please find attached the TAC correspondence related to Rakowski Recycling. – Scrap Metals and Auto Wrecking Facility file (5699.00) for distribution to the public registries. The documents included are:

Public Comments

- June 12, 2018 from Francoise Therrien Vrignon Green Party St. Boniface Candidate and James Beddome, Green Party Leader; Michelle Berger; Craig\_Adolphe; Dan\_Lambert; 6 pages
- June 11, 2018 from Christine Trickey; 2 pages
- June 10, 2018 from Gary Tessier and family; Madeleine Vrignon; 3 pages
- June 10, 2018 petition signed by 217 residents; 18 pages
- June 9, 2018 from Cheryl\_Claque; T. Cwik; S. Dupies; L. Campagne; C. Robi; K. Vielfaune; Old St. Boniface Resident Association; Wes Rist; three unidentified residents; E. Fontaine; K. Poersolf; J. Milne; C. Danderean 18 pages
- June 8, 2018 from Paul; B. Zelinsky; T. Mevard; D. Filipchuk; Andre; K. Lawson; Don F.; Janes H.; V. Hnytka; three unidentified residents; 11 pages
- June 3, 2018 from South\_St.\_Boniface\_Residents\_Association; 19 pages
- May 22 2018 from Madeline\_Lepine; 1 page
- May 17 2018 from Danielle Brodeur; Freya\_Martinot; 2 pages
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TAC Comments

- June 18, 2018 email from Wildlife Branch, 1 page
- June 13, 2018 email from Lands Branch, 1 page
- June 12, 2018 memo from Environmental Compliance and Enforcement Branch, 1 page
- June 7, 2018 an email from Forestry and Peatlands Branch, 1 page
- June 6, 2018 email from Health, 1 page
- May 25, 2018 email from Office of Fire Commissioner, 1 page
- May 16, 2018 an email from Office of Drinking Water, 1 page
- May 16, 2018 email from Central Region IRMT, 1 page

88 pages total

Thank you.

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Eshetu Beshada, Ph.D., P. Eng.

**Beshada, Eshetu (SD)**

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**From:** Kiss, Brian (SD)

**Sent:** June-18-18 1:32 PM

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

**Subject:** RE: EAP for Review File 5699.00 - Rakowski Recycling.

No wildlife related concerns.

-Brian Kiss

## Beshada, Eshetu (SD)

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**From:** +WPG1212 - Conservation\_Circulars (SD)

**Sent:** June-13-18 8:29 AM

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

**Subject:** RE: EAP for Review File 5699.00 - Rakowski Recycling.

Good morning

Lands Branch SD has no concerns as regards File 5699.00 - Rakowski Recycling. Regional Land Manager has already forwarded a no concern response to EAB.

Thank you for the opportunity to review

### Winifred Frias

Crown Land Programs Administrator  
Lands Branch  
Department of Sustainable Development  
200 Saulteaux Crescent, Box 25  
Winnipeg, Manitoba R3J 3W3 CANADA  
Phone: (204) 945-4524  
Facsimile: (204) 948-2197



Please consider the environment before printing this e-mail



DATE: June 12, 2018

TO: Eshetu Beshada PhD, P.Eng.  
Environmental Engineer  
Environmental Approvals Branch  
Manitoba Sustainable Development,  
123 Main St., Ste. 160  
Winnipeg, MB R3C 1A5

FROM: Julie Froese/Krista Olafsson/ /Alvin Dyck/Nada Suresh  
Environment Officer  
Environmental Compliance and Enforcement  
Manitoba Sustainable Development,  
1007 Century Street  
Winnipeg MB R3H 0W4

**SUBJECT: Comments on Environment Act Proposal – Rakowski Recycling (File No.5699.00)**

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

1. Noise: Section 4.0 “Potential Environmental Effects Assessment” has not assessed the noise impacts arising from various activities connected to operation. Item No. 4 of the letter of KGS dated April 18, 2018 responded to noise concerns raised. However it was noted only noise related measurement discussed was about operation of grapple. It was mentioned that 200m distance noise level would 77dBA.
  - Environmental Compliance and Enforcement Branch (ECE) has received a number of complaints in the last year stating that loud noise as an issue in the area, of which metal noise (movement, clanging etc) was specifically identified. It was noted that no attempt was made as part of the assessment to provide noise level measurements at the boundary of the facility or nearest residential area. ECE believes proper assessment of noise levels, while various operations are taking place should be conducted and assessed at least at the boundary of the facility.
2. Fugitive dust emission: Potential impacts of fugitive dust emission related to metal recycling facilities are well documented. The EAP for this facility assesses it as a negligible level. However, past inspection of the facility shows that storage pile of metal turnings, unpaved working areas etc. generate considerable dust emission on a typical dry day. In addition, ECE has received complaints in the last year that have identified that dust – specifically from the busy driveway at 454 Archibald, has been a problem at times. Further mitigation of dust emissions needs to be explored - eg. Having windbreaks around metal turning stock piles or covers on piles - in addition to the dust suppressants suggested in the EAP.
3. It is recommended that air quality/dust emissions control be articulated in further detail by the proponent, and that monitoring of air emissions be carried out for a specified amount of time after the development is commissioned.
4. Stockpiling of scrap material: One of the requirements in the conditional approval is to have a fence around the facility to reduce the visual pollution. However often it is noted that large stockpiles of scrap metals on the site. Should there be a restriction in height in stock piling the scrap metal at the facility?
5. Section 2.7: Only the Hazardous Waste Generator registration is stated. It is not clear what are the other licenses, permits and authorizations received from the federal, provincial and municipal governments and other licensing bodies for continuous operation of this facility.
6. Section 4.2 and 4.3: Potential environmental impact assessment in EAP identify major contaminant for soil and ground water as potential spills. However, large piles of metal turnings are piled up on unpaved ground at the facility. These metal piles are exposed to weather and other elements. Thus, there is a potential environmental impact arising from seepage of drainage water from the piles contaminating the soil and ground water. This aspect was not addressed in the report. It is not clear whether storage of such material require paved pad to reduce contamination of soil and water.
7. It is not clear how the contaminated drainage water is managed at the facility. Please provide further clarification on this point.

**Beshada, Eshetu (SD)**

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**From:** Epp, Jane (SD)

**Sent:** June-07-18 3:33 PM

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

**Subject:** RE: EAP for Review File 5699.00 - Rakowski Recycling.

Forestry and Peatlands has no concerns.

Jane Epp

## **Beshada, Eshetu (SD)**

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**From:** Richards, Lisa (WRHA)

**Sent:** June-06-18 4:54 PM

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

**Cc:** Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Chang, Heejune (WRHA) <hchang@wrha.mb.ca>; Weiss, Elise (HSAL) <Elise.Weiss@gov.mb.ca>

**Subject:** EAP for Review File 5699.00 - Rakowski Recycling

I have reviewed the proponent's proposal. Overall, I have concerns with the location of this recycling facility adjacent to a residential area. There are ongoing concerns with noise, explosions, odor and air quality from the Mission Industrial area, as per residents represented by the South St. Boniface Residents Association.

Please have the proponent provide the rationale for the statement

"The adverse effects of operation activities on noise and vibration were assessed as minor", in light of this facility being adjacent to a residential area. Consider requesting a study to evaluate the current noise impacts for the community adjacent to the facility.

Air quality continues to be a concern for residents, and in my opinion air pollutants from the Mission Industrial area pose the greatest health threat to residents in the area. I understand this facility operates plasma torches, which are not mentioned in the proposal. I would like the proponent to confirm whether or not plasma torches are currently being used at this facility. If yes, I would like to the proponent to comment on the rationale for the ongoing use of plasma torches, provide a brief review of the health impacts of the use of plasma torches (in particular, for public health) and indicate mitigation strategies to address air and noise pollution from these devices. Consider requesting a study to evaluate current air quality on and adjacent to the property.

I would also suggest that the South St. Boniface Residents Association be consulted on this proposed license renewal.

Thanks,

Lisa Richards, MD MSc FRCPC  
Medical Officer of Health  
Winnipeg Regional Health Authority  
2nd Floor, 490 Hargrave St.  
Winnipeg, MB  
R3A 0X7

Administrative Assistant: Crystal Swain

[cswain@wrha.mb.ca](mailto:cswain@wrha.mb.ca)

Tel: 204 940-1907

Fax: 204-956-4494

## **Beshada, Eshetu (SD)**

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**From:** Nimetz, Debby (OFC)

**Sent:** May-25-18 11:58 AM

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

**Subject:** FW: EAP for Review File 5699.00 - Rakowski Recycling.

Hello Eshetu,

The OFC recommends that the proponent to:

- Comply with the Manitoba Fire Code, and
- Submit Fire Safety Plan (as per NFC Section 2.8) and obtain required permits from the Authority Having Jurisdiction (City of Winnipeg).

Regards,

*Debby Nimetz*

*Administrative Assistant*

*Office of the Fire Commissioner*

*508-401 York Ave.*

*Winnipeg, Manitoba R3C 0P8*

*Phone: 204-945-3322*

*Fax: 204-948-2089*

## **Beshada, Eshetu (SD)**

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**From:** Vitt, Cory (SD)

**Sent:** May-16-18 8:27 AM

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

**Subject:** RE: EAP for Review File 5699.00 - Rakowski Recycling.

No concerns.

Office of Drinking Water (ODW)

**Cory Vitt, M.Eng. P.Eng.**

Approvals Engineer

Office of Drinking Water

Manitoba Sustainable Development

1007 Century Street

Winnipeg, Manitoba R3H 0W4

**Phone:** 204-806-1363

**Fax:** 204-945-1365

**Email:** [Cory.Vitt@gov.mb.ca](mailto:Cory.Vitt@gov.mb.ca)

**Website:** [www.manitoba.ca/drinkingwater](http://www.manitoba.ca/drinkingwater)



**Beshada, Eshetu (SD)**

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**From:** Kowalchuk, Sheldon (SD)

**Sent:** May-16-18 9:49 PM

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

**Subject:** RE: EAP for Review File 5699.00 - Rakowski Recycling.

Hi,

The Central Region IMRT has no concerns with this proposal.

**Sheldon Kowalchuk**

**Regional Land Manager, Central Region**

Parks and Regional Services Division

Manitoba Sustainable Development

Box 6000, 75-7th Avenue

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