



Krystal Penner
Environmental Approvals Branch
Department of Conservation and Climate
1007 Century Street, Winnipeg MB R3H 0W4
(204) 945-7107 | Krystal.Penner@gov.mb.ca

Saint-Modeste, 23rd of July 2020

RE: File 6055.00 – Berger’s Response to the questions of the Public Review

Dear Krystal,

This letter is a response to your email dated 15th of July 2020 regarding the Public Review comments for Berger’s project. Berger is indeed planning on doing a public consultation and hearing July 21st at Dugald Community Center. I will send you the power point presentation as soon as I have the final version. I will also provide you a copy of the register we will keep at the front for the attendees. The center only allows 50 persons to come in with measures against Covid-19. Berger might decide to do a second presentation if we feel that there are still concerns or questions to be answered.

Regarding your request for information:

- *Light pollution – Please detail the lighting design for the development, anticipated impacts to adjacent property owners and mitigation measures.*
Light infrastructure will be comprised of 1500W low-glare LED lights that will be concentrated around the plant and the parking. Berger will make sure that the lighting will be pointing in a downward motion to limit the light pollution.
- *Impacts to roads – Please provide more specific details on the anticipated impacts from the road (dust), detail what the expected route is for access to the site for delivery trucks and the mitigation measures to control the environmental impacts (dust). Please estimate the annual # of trucks per year?*

The only roads that may be impacted by the increase of truck traffic will be the 207 (Deacon road) and the 64N (Oakwood road) up to Berger’s property only. Berger is currently collaborating with the RM of Springfield to ensure that any potential impacts coming directly from the project’s increased traffic will be properly addressed. An agreement between the two parties will be signed for any additional maintenance works as deemed necessary by the Municipality which could include, but is not limited to: additional aggregate materials, dust suppressant, additional grading works and other maintenance works related to maintain the roadway to municipal standards.



- *Impacts to the aquifer - Are you aware of any old/abandoned wells on the site? If so, can you confirm if they have they been sealed? Will any groundwater sampling be undertaken? If so, for what parameters and at what sampling frequency?*

Berger has discussed with the previous owner regarding any underground infrastructures (septic installation, phone cable and wells). To the knowledge of the previous owner, there are no abandoned well on site. Additionally, the report from Friesen Drillers found no records of an abandoned well on the property. If Berger does find an abandoned well, we will make sure it is properly sealed.

Regarding the sampling of groundwater, Friesen Drillers has taken a baseline sample during the pumping test on the field. Based on the report from Friesen Drillers and the mitigation measures proposed by Berger, impacts on the groundwater quality are expected to be non-existent, thus, Berger is not proposing any sampling of the groundwater.

- *Odour – Odour is not addressed in the proposal. Please characterize the expected odour to be generated from site, and detail mitigation measures.*

Odour is not addressed in the proposal because there are no sources of disagreeable odours coming from the proposed project, whether it be from the raw materials, chemical additives, etc. Berger will not use compost, manure or other strong smelling additives within his mixing line

- *Noise – I would underscore noise has been raised as a significant concern in the public review. Can you anticipate the noise impacts at the nearest residence in decibels?*

General rule of thumbs for sound propagation in an open environment is as follow: Every time you double the distance, you lose 6 decibels from the original sound source and force. The maximum decibels will come from the back up alarms of heavy equipment, which are estimated at 100 dB at 1 meter. Considering this, the sound at 500m will be estimated at about 55 dB and 50 dB at 1 km. Berger has already consulted with the RM of Springfield to ensure that the operations will follow the regulation (By-Law).

- *Air Emissions - Can you characterize the expected fugitive dust from the site and the impacts to the nearest residence, and detail mitigation measures to prevent any unacceptable impacts.*

There are two potential sources of air emissions coming from the project. The first one is related to peat particles being blown outside of Berger's property. As discussed within the application document and Berger subsequent additional information to the Committee, a number of mitigation measures are proposed in order to limit the peat dust from the project:

- Installation of two dust collectors directly connected to the production line in order to filter the peat particles and recirculate them within the product.
- Enclosed production lines to limit peat dust within the plant.
- Construction of a peat bunker (16 ft tall concrete wall) for the loose peat to ensure that it will not be blown away.
- Appropriate covering of the transport truck

The second source of dust will be coming directly from the traffic on the roads around the project. As stated in the items regarding the impacts on the road, Berger is collaborating with the RM of Springfield in order to mitigate this potential source of dust by adding additional dust suppressant on the municipal road impacted by the project. Berger will also apply dust suppressant within its property as needed.



- *Zoning - The first comment in the attached document articulates concerns raised in this regard. In response to this concern, amongst other public concerns in this respect, we are confirming with Municipal Relations that the land use conforms with all applicable zoning legislation. If you have any supporting information in this respect, please provide for my review and TAC review as necessary.*

Please see attached to this response Berger's development permit from the RM of Springfield. Agriculture Support Industry (the activity Berger's fall under with its project's proposition) is clearly indicated as a permitted use within the current zoning of Berger's property. For additional information, Berger would refer the Committee directly to the RM of Springfield which will be more suited to provide the necessary information regarding the zoning process.

Additional items (requested during a phone conversation with Krystal Penner on the 20th of July):

- *Drinking water:*

As of now, the esthetic quality (odour and colour) of the water on site are not appropriate for human consumption. Berger will be providing bottled water to the employees. Should Berger decide to use any wells as a source of potable water, appropriate sampling and permits will be obtained prior to the utilization of said water.

- *Health Safety related to peat particles:*

Berger is not aware of any risks associated with the inhalation/consumption of peat particles, except the ones related to any similar dust particles (i.e, irritation of the eyes, nose and throat). Berger is using peat as a raw material for growing media used for the culture of vegetables and fruits that will be ultimately consumed by humans. Thus, the Canadian Food Inspection Agency (CFIA) is doing yearly test within our harvested peatlands to ensure that there is no health hazard coming from the peat.

I do hope this response will give you enough information to properly respond to the public comments. Berger remains entirely available if you need further information.

A handwritten signature in blue ink, appearing to read 'P. Sauvageau', written over a light blue horizontal line.

Pierre-Olivier Sauvageau, M. Sc
Resource Advisor





Rural Municipality of Springfield
Planning & Development Department
Unit 1 – 686 Main Street
Box 219
Oakbank, Manitoba, Canada
R0E 1J0
Phone: (204) 444-3824
Fax: (204) 444-2389

February 19, 2020

Via Fax: 204-948-2089

Office of the Fire Commissioner
c/o Mr. Edgardo Dela Cruz
508 Norquay Building
401 York Ave
Winnipeg MB R3C 0P8

Attn.: Mr. Edgardo Dela Cruz

**Re: Group F Division 3 Building
(Agricultural Peat Moss Processing Operation)
DX 2020/01 - "PILE AND FOUNDATION ONLY";
NW ¼ of 23-11-4 EPM as described under CT#3011172
22 054 Oakwood Road 64N
Roll No. 98350.000**

Les Tourbieres Berger Ltee c/o Mr. Denis Lebel, has submitted plans for the construction of a 44,062 sq. ft. Group F Division 3 Building (Agricultural Peat Moss Processing Operation), located at 22 054 Oakwood Road 64N, NW ¼ of 23-11-7 EPM as described under CT#3011172. This parcel is zoned 'AG' Agricultural General Zoning District under the Springfield Zoning By-law No. 08-01, as amended.

Under the current zoning, "Agriculture Activities, Agri-Business, Agriculture Support Industry and Agricultural Product Storage", as defined below, are listed as Permitted Uses.

***Agricultural Activities** means a use of land for agricultural purposes. Typical uses include farming, pasturage, agriculture, apiculture, aquaculture, floriculture and horticulture.*

***Agri-Business** means a commercial establishment that provides goods or services to the agricultural sector.*

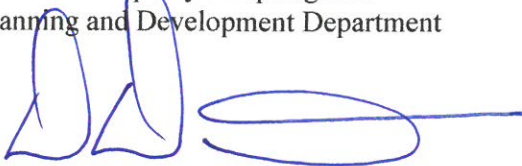
***Agriculture Support Industry** means an industry, commercial service or retail business in which the major product or service being bought, sold or processed is intended mainly for, from or by farmers.*

***Agricultural Product Storage** means the temporary storage of any agricultural product for future use, delivery or processing as per The Environment Act.*

Conditions of the Development Permit are subject to the following:

1. This Development Permit is for only the “PILE AND FOUNDATION”;
2. Approval of a Building Permit from the Office of the Fire Commissioner;
3. Approval of a Lot Grade Permit;
4. Approval from Sustainable Development for an Environmental license, if required; (contact Krystal Penner, (204) 945-7107 Krystal.Penner@gov.mb.ca Manitoba Sustainable Development)
5. Enter into an Agreement with Council for any future road improvements (Oakwood Road), if required;
6. Any required on site and off site upgrades as per the SBC design (Lot Grading / Surface Drainage Plan) and must be approved by the Municipality of Springfield;
7. Any required off site upgrades as per the SBC “Oakwood Road Assessment” (road improvements) must be approved by The Municipality of Springfield;
8. An adequate engineered on site Fire Suppression System be approved by our Municipal Fire Chief, if required;
9. A fire safety plan approved by our Municipal Fire Chief;
10. If any large quantities of well water are required for Fire Suppression or any other use, then the municipality will require a groundwater hydrogeological engineering impact assessment from a professional hydrogeological engineer.
11. Submission of a Landscape Plan as per Section 30.0 of Springfield Zoning By-Law No. 08-01 (copy enclosed); The Landscape Plan shall also include the required off street vehicular parking in the amount of forty-five (45) regular spaces and two (2) accessible spaces (relating to this building) as per Table 32.1.1 and Table 32.3.1 of the Zoning By-Law 08-01.
12. Upon completion of the building/structure, a copy of the Occupancy Permit issued by the Office of the Fire Commissioner shall be submitted to the Municipal Planning Office.

Rural Municipality of Springfield
Planning and Development Department



Dan Doucet, C.E.T., C.B.C.O.
Director of Planning and Development

p.c. Les Tourbieres Berger Ltee c/o Denis Lebel



Rural Municipality of Springfield
Planning & Development Department
Unit 1 – 686 Main Street
Box 219
Oakbank, Manitoba, Canada
R0E 1J0
Phone: (204) 444-3824
Fax: (204) 444-2389

June 9, 2020

Via Fax: 204-948-2089

Office of the Fire Commissioner
c/o Mr. Edgardo Dela Cruz
508 Norquay Building
401 York Ave
Winnipeg MB R3C 0P8

Attn.: Mr. Edgardo Dela Cruz

**Re: Group F Division 3 Building
(Agricultural Peat Moss Processing Operation)
DX 2020/21 - "Full Permit";
NW ¼ of 23-11-4 EPM as described under CT#3011172
22 054 Oakwood Road 64N
Roll No. 98350.000**

Les Tourbieres Berger Ltee c/o Mr. Denis Lebel, has submitted plans for the construction of a 44,062 sq. ft. Group F Division 3 Building (Agricultural Peat Moss Processing Operation), located at 22 054 Oakwood Road 64N, NW ¼ of 23-11-7 EPM as described under CT#3011172. This parcel is zoned 'AG' Agricultural General Zoning District under the Springfield Zoning By-law No. 08-01, as amended.

Under the current zoning, "Agriculture Activities, Agri-Business, Agriculture Support Industry and Agricultural Product Storage", as defined below, are listed as Permitted Uses.

***Agricultural Activities** means a use of land for agricultural purposes. Typical uses include farming, pasturage, agriculture, apiculture, aquaculture, floriculture and horticulture.*

***Agri-Business** means a commercial establishment that provides goods or services to the agricultural sector.*

***Agriculture Support Industry** means an industry, commercial service or retail business in which the major product or service being bought, sold or processed is intended mainly for, from or by farmers.*

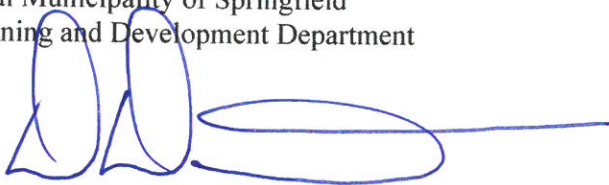
***Agricultural Product Storage** means the temporary storage of any agricultural product for future use, delivery or processing as per The Environment Act.*

Conditions of the Development Permit are subject to the following and will not be permitted Occupancy or to be in operation until the following is completed:

1. Approval of a Building Permit from the Office of the Fire Commissioner (contact: Edgardo Dela Cruz (204) 471-4865 Edgardo.Delacruz@gov.mb.ca);
2. Approval of a Lot Grade Permit LGP 2020-05 (obtained Feb 19, 2020) SBC to confirm the grades upon completed of the building but prior to the request for the Lot Grading Deposit (contact Ross Mitchell SBC - Sison Blackburn Consulting Inc. (204) 505-0855 rmitchell@sbcinc.ca);
3. Approval of an Environmental license from Sustainable Development; (contact Krystal Penner, (204) 945-7107 Krystal.Penner@gov.mb.ca Manitoba Sustainable Development)
4. Approval of a Wastewater permit from Conservation and Water Stewardship; (contact Marguerite Reimer, Environment Officer (204) 945-7016 Marguerite.Reimer@gov.mb.ca Conservation and Water Stewardship - Environmental Compliance and Enforcement)
5. Approval of an Electrical permit from Manitoba Hydro.
6. Enter into an Agreement with Council, at the discretion of Council, for any future off site road improvements and maintenance of Oakwood Road,; (contact Colleen Draper, CAO (204) 444-6161 cdraper@rmofspringfield.ca Rural Municipality of Springfield)
7. If any required off site upgrades (road improvements) must be approved by Blaine Moffat, Director of Public Work, (204) 444-2241 bmoffat@rmofspringfield.ca Rural Municipality of Springfield)
8. Any required on site and off site upgrades as per the SBC design (Lot Grading / Surface Drainage Plan) and must be approved by the Rural Municipality of Springfield Planning and Development Office, Dan Doucet, CET (204) 444-3824 ddoucet@rmofspringfield.ca);
9. An adequate engineered on site Fire Suppression System be approved by our Municipal Fire Chief, Garth Cook, (204) 981-4042 GCook@rmofspringfield.ca ;
10. A fire safety plan approved by our Municipal Fire Chief Garth Cook, (204) 981-4042 GCook@rmofspringfield.ca ;
11. If any large quantities of well water are required for Fire Suppression or any other use, then the municipality will require a groundwater hydrogeological engineering impact assessment from a professional hydrogeological engineer and must be approved by the Rural Municipality of Springfield Planning and Development Office, Dan Doucet, CET (204) 444-3824 ddoucet@rmofspringfield.ca);

12. Submission of a Landscape Plan as per Section 30.0 of Springfield Zoning By-Law No. 08-01 (copy enclosed); The Landscape Plan shall also include the required off street vehicular parking in the amount of forty-five (45) regular spaces and two (2) accessible spaces (relating to this building) as per Table 32.1.1 and Table 32.3.1 of the Zoning By-Law 08-01 and must be approved by the Rural Municipality of Springfield Planning and Development Office, Dan Doucet, CET (204) 444-3824 ddoucet@rmofspringfield.ca);
13. Upon completion of the building/structure, a copy of the Occupancy Permit issued by the Office of the Fire Commissioner (contact: Edgardo Dela Cruz (204) 471-4865 Edgardo.Delacruz@gov.mb.ca); shall be submitted to the the Rural Municipality of Springfield Planning and Development Office, Dan Doucet, CET (204) 444-3824 ddoucet@rmofspringfield.ca);

Rural Municipality of Springfield
Planning and Development Department



Dan Doucet, C.E.T., C.B.C.O.
Director of Planning and Development

p.c. Les Tourbieres Berger Ltee c/o Denis Lebel