

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Subject: CanWhite Sands Environment Act Proposal - Sand Processing Facility - File No. 6057.00

The attached material can be placed in the public registries for the above project:

Technical Advisory Committee Comments on the Environment Act Proposal (15 pages)

Manitoba Conservation and Climate, Office of Drinking Water, July 21, 2020

Manitoba Conservation and Climate, Parks and Protected Spaces Branch, July 21, 2020

Manitoba Agriculture and Resource Management, Forestry Branch, July 22, 2020

Manitoba Municipal Relations, Inspection and Technical Services, July 24, 2020

Manitoba Conservation and Climate, Drainage & Water Rights Licensing, July 28, 2020

Manitoba Health, Seniors and Active Living, Active Living, Population, and Public Health, July 28, 2020

Manitoba Conservation and Climate, Drainage and Water Rights Licensing, July 31, 2020

Manitoba Infrastructure, Highway Planning and Design Branch, August 14, 2020

Manitoba Sport, Culture and Heritage, Historic Resources Branch, August 25, 2020

Manitoba Conservation and Climate, Environmental Compliance and Enforcement Branch, August 25, 2020

Manitoba Agriculture and Resource Management, Lands Branch, August 25, 2020

Manitoba Conservation and Climate, Environmental Approvals Branch, August 27, 2020

Manitoba Agriculture and Resource Management, Eastern Region IRMT, August 31, 2020

Manitoba Agriculture and Resource Management, Wildlife and Fisheries, August 31, 2020

Jennifer Winsor, P.Eng.

Environmental Engineer, Environmental Approvals Branch

Manitoba Conservation and Climate

From: Vitt, Cory (CC)

To: Winsor, Jennifer (CC)

Subject: RE: Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Date: July 21, 2020 9:44:20 AM

No concerns.

Office of Drinking Water (ODW)

Cory Vitt, CMMA M.Eng. P.Eng.

(pronouns: they/them/he/him; please don't use "Mr. Vitt")

Approvals Engineer

Office of Drinking Water

Department of Conservation and Climate

1007 Century Street

Winnipeg, Manitoba R3H 0W4

From: Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>

Sent: July 21, 2020 11:30 AM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Subject: RE: Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Parks and Protected Spaces Branch has no comments or concerns to offer.

From: Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>

Sent: July 22, 2020 8:21 AM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Subject: RE: Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Hello,

If there is any clearing of trees on crownlands (road allowances etc.) please contact the regional forester as a Timber Damage Appraisal may be required.

Marianne

From: Garcia, Norman (MR) <Norman.Garcia@gov.mb.ca>

Sent: July 24, 2020 2:20 PM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Cc: Morhun, Lisa (MR) <Lisa.Morhun@gov.mb.ca>; Escarlan, Mary Lynn (MR) <MaryLynn.Escarlan@gov.mb.ca>

Subject: RE: Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Good afternoon Jennifer,

Thank you for the opportunity to review this file and provide comments.

The ITS recommends that:

- the applicant obtain the required building and occupancy permits from the authority having jurisdiction for any new buildings and the alteration, reconstruction, demolition, removal, relocation, and occupancy of all existing buildings, and
- an emergency plan in accordance with the Manitoba Fire Code be filed and approved by the local fire department prior to occupancy.

Regards,

Norman A. Garcia, P.Eng., LEED AP BD+C

Engineer - Building and Fire Codes

Inspection and Technical Services

Municipal Relations

From: Wiseman, Kylene (CC) <Kylene.Wiseman@gov.mb.ca>

Sent: July 28, 2020 11:32 AM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Cc: Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>

Subject: RE: FOR YOUR ACTION - Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Good morning,

Based on our understanding of the proposed project, groundwater will be used for “other” purposes (fire suppression); therefore, an application for a Water Rights Licence is required.

Thank you,

Kylene Wiseman, P. Geo.

A/Head of Groundwater Licensing

Water Use Licensing Section - Manitoba Conservation and Climate

Box 16 - 200 Saulteaux Crescent Winnipeg MB R3J 3W3

From: Robinson, Karen (HSAL) <Karen.Robinson@gov.mb.ca>

Sent: July 28, 2020 10:23 AM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Cc: Hilderman, Tim Dr. (HSAL) <Tim.Hilderman@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>

Subject: RE: Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Hi Jennifer

Here is my official response:

1. Please provide data on the levels of respirable silica (less than 10 micrometer diameter) in the raw material and in the reject piles.
2. Please ensure that fine particulate sand is contained in a secure manner, other than unsecured outdoor piles. For example, Is it possible to store the fine silica reject sand in an enclosed storage area?
3. Please provide information on the proposed air quality monitoring program.
4. Please provide modelling data for predicted impact to air quality on closest adjacent private properties (not just to the current residences, which are further away than the closest adjacent private property).

Thanks

Karen

Karen Robinson MD, MPH, CCFP, FRCPC

Medical Officer of Health

Interlake Eastern RHA

From: Caillier, Ginette (CC) <Ginette.Caillier@gov.mb.ca>

Sent: July 31, 2020 1:48 PM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Cc: Lewick, Wendy (CC) <Wendy.Lewick@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>

Subject: RE: FOR YOUR ACTION - Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Good Afternoon Jennifer,

We have no concerns at this time.

Ginette Caillier

Conservation and Climate

From: +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>
Sent: August 14, 2020 8:57 AM
To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>
Subject: RE: Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Hi Jennifer,

MI's Roadside Development has reviewed the EAP and has the following comments/concerns:

- A permit is required for the location and intensification of use of the proposed access onto PR 203. For permit information, please contact Sheena Del Rosario at 204-945-3457 or by email at Sheena.DelRosario@gov.mb.ca. Permit information and permit application forms can also be found at <https://www.gov.mb.ca/mit/hpd/permits.html>;
- The applicant will have to provide our Regional Technical Services Engineer (TSE), Rob Crang, 204-945-8955 or Robert.Crang@gov.mb.ca with the sufficient information to ensure drainage from this development would not adversely affect the provincial highway system. If necessary, the Regional TSE may request the applicant to submit a detailed drainage plan prepared by qualified experts. Please note that the cost of this study and any revisions to the highway drainage system directly associated with this proposed development will be the responsibility of the developer; and
- Traffic generated by this development may have an impact on the traffic operations of PR 302 and PTH 15. Therefore, we require the developer to provide some preliminary traffic projections. Please contact Karen Toews (204) 945-0324 or Karen.Toews@gov.mb.ca. Based on this information, our department will determine if a more detailed Traffic Impact Study is required. If required, this study is to be prepared by a qualified engineer and will determine what impact the traffic generated by this development will have on the traffic operations at this location and what, if any, on highway improvements will be required.

Thank you very much for the opportunity to review and comment.

From: +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>

Sent: August 25, 2020 11:22 AM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Subject: RE: Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00 (AAS-20-16037)

Good morning,

Further to your request for the above noted heritage screening, the Historic Resources Branch has examined the location in conjunction with Branch records for areas of potential concern. The potential to impact significant heritage resources has been addressed based on the results from the Heritage Resource Impact Assessment under permit A25-20 (AAS-19-15647). Therefore, the Historic Resources Branch has no concerns with the proposed development at this time.

If at any time, however, heritage resources or human remains are encountered in association with these lands during any phase of development, the Historic Resources Branch is to be contacted immediately.

If you have any questions or comments, please feel free to contact the Branch as below.

Brittany Romano

Impact Assessment Archaeologist

Historic Resources Branch | Manitoba Sport, Culture and Heritage

213 Notre Dame Avenue, Main Floor | Winnipeg, MB | R3B 1N3

DATE: August 25, 2020

TO: Jennifer Winsor
Environmental Approvals
Conservation and Climate
1007 Century Street
Winnipeg MB R3H 0W4

FROM: Marguerite Reimer
Environmental Compliance and
Enforcement
Conservation and Climate
1007 Century Street
Winnipeg MB R3H 0W4
P: (204) 945-7016
F: (204) 948-3833

SUBJECT: Environment Act Proposal – CanWhite Sands – Vivian Sands Processing Facility (Client File No. 6057.00)

Environmental Compliance and Enforcement (ECE) has reviewed the above noted Environment Act Proposal and can provide the following:

1. As the issue of particulate matter control is of significant public and environmental concern, ECE requests the proponent provide more detailed information regarding:
 - the dust collection system and bag house, and
 - management of the reject sand pile, such as protocol for monitoring and maintaining moisture levels.
2. ECE recommends the proponent develop and maintain a complaint management plan to track and respond to public complaints regarding the operation of the Development.
3. Hazardous Waste Registration for the Development may be required if the Development anticipates generating and storing waste as per the Hazardous Waste Regulation M.R. 195/2015.
4. Above-ground petroleum storage facilities with a total storage capacity of 5000 L or more require a permit under the Storage and Handling of Petroleum Products and Allied Products Regulation M.R. 188/2001.
 - Please note that above-ground petroleum storage facilities with a total storage capacity of less than 5000 L do not require a permit under the Storage and Handling of Petroleum Products and Allied Products Regulation M.R. 188/2001, but are still subject to partial application of the regulation.
5. In accordance with the Onsite Wastewater Management Systems Regulation M.R. 83/2003, all new or modified onsite wastewater management systems must be registered with Manitoba Conservation and Climate prior to installation.
6. In the event of a fire, release, spill, leak or discharge of a pollutant or contaminant to the environment, immediately report the incident to Manitoba Conservation and Climate by calling the 24-hour Emergency Response Line at (204) 944-4888 or 1-855-944-4888. Provide a report following the incident with details of the occurrence, clean-up actions and future mitigation of a similar event.

August 25, 2020

TO: Jennifer Winsor, P.Eng.
Environmental Engineer
Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century St
Winnipeg MB R3H 0W4

FROM: Michelle Méthot
Manager, Programs and Strategies
Lands Branch
Manitoba Agriculture and Resource Developme
200 Saulteaux Cres
Winnipeg MB R3J 3W3

SUBJECT: EAP - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Manitoba Agriculture and Resource Development, Lands Branch, has reviewed Environment Act Proposal (EAP) 6057. The Vivian Sand Processing Plant EAP identifies the use of Crown land within NE-29-10-8E1 “to access the Project site area on a temporary basis during Project construction, and possibly early Project operations, while the permanent road is being completed”.

Although temporary access is proposed, Lands Branch recommends development and use of the Government Road Allowance between the south ½ of 32-10-8E1 and the north ½ of 29-10-8E1 to accommodate both temporary and permanent access to the site.

If however, the proposed temporary access on Crown land is required, the proponent should contact Mines Branch prior to making an application for General Permit under the Crown Lands Act as there is an existing subsurface allocation. In addition there are two existing surface allocations where the temporary access is being proposed.

As additional Crown land is located in close proximity to the proposed Vivian Sand Processing Plant, Land Branch recommends that Environmental Approvals Branch undertake an assessment to consider potential impacts to adjacent Crown lands.

DATE: August 27, 2020

TO: Jennifer Winsor
Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street, Winnipeg

FROM: Muntaseer Ibn Azkar
Air Quality Section
Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street, Winnipeg

SUBJECT: CanWhite Sand Corp. – Vivian Sand Processing Plant (File 6057.00)

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

- Provided modeling results show exceedances of the Manitoba Ambient Air Quality Criteria (MAAQC) for PM_{2.5}, PM₁₀, and TSP concentrations in the surrounding area of the project. As a result, there is a potential that the proposed project activities will contribute to the deterioration of ambient air quality in the area. Therefore, it is suggested that additional mitigation measures may need to consider for controlling the particulate matter emissions.
- In the modeling study, the same amount of background concentrations (14 µg/m³) for PM₁₀ and TSP has been applied, which may not be appropriate. Study¹ has shown that the average mass ratio of PM₁₀ to TSP is 0.56 (±0.24) in Canada, and this ratio is relatively higher in the prairies compare to other parts of Canada. It is likely that the TSP concentration in the modeling study has been underestimated due to the use of lower background concentrations. This underestimation indicates a higher potential for the deterioration of ambient air quality in the surrounding area.
- The proponent did not provide any information regarding building located within the facility. Was the building-downwash effect taken into account in the modeling?
- Table 5 in the assessment report shows “Summary of Ozone Concentration Data Obtained from Ellen St. station”. What is the period of the data listed in Table 5? Does the Table 5 summarize the hourly average of one-year data or several years of data? If so, then which year/years?
- Air Quality Section suggests that the proponent submit a more detailed particulate matter emission mitigation plan and an ambient air quality monitoring plan.

¹Jeffrey R. Brook, Tom F. Dann & Richard T. Burnett (1997): *The Relationship Among TSP, PM₁₀, PM_{2.5}, and Inorganic Constituents of Atmospheric Particulate Matter at Multiple Canadian Locations*, *Journal of the Air & Waste Management Association*, 47:1, 2-19, DOI: 10.1080/10473289.1997.10464407

From: Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>

Sent: August 31, 2020 11:44 AM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Cc: Matthewson, Chris (ARD) <Chris.Matthewson@gov.mb.ca>; Herle, Trina (ARD) <Trina.Herle@gov.mb.ca>; Hallett, Morgan (CC) <Morgan.Hallett@gov.mb.ca>; Kiss, Brian (ARD) <Brian.Kiss@gov.mb.ca>; Methot, Michelle (ARD) <Michelle.Methot@gov.mb.ca>

Subject: FW: Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Importance: High

Here are the comments from the eastern region IRMT:

- The application states that:
A separate Environment Act licence application will be submitted later this summer for the silica sand extraction activities that will supply the Processing Facility with sand ('Extraction'). Extraction will involve temporary water well drill holes that are located on small sites for relatively brief periods of time.

As the processing plant will require that the necessary supplies of sand be secured, we recommend that the approvals associated with these two applications be linked.

- The application states that:
*CanWhite will, with the approval of the RM of Springfield, construct a permanent access road on the municipal road allowance directly south of the Processing Facility (**Figure 1-2**).*

*CanWhite has obtained permission from Manitoba Hydro to use the existing power line access road easement in NW-29-10-8E1 and NE-29-10-8E1 (**Figure 1-2**) to access the Project site area on a temporary basis during Project construction, and possibly early Project operations, while the permanent road is being completed (expected to last no longer than four months to one year).*

The proposed temporary access also requires use of crown land. We recommend that the proponent construct the temporary and permanent road on the same route; i.e. on the municipal road allowance shown in the application as the proposed permanent road location.

- The application states that:
Goldenwinged Warbler *Vermivora chrysoptera*

*- A limited amount of potentially suitable habitat occurs at the Project Site for this species, i.e., mature forest (**Figure 4-6** and **Table 4-3**) where canopy gaps create a patchy shrub layer that is comparable to the understorey of early successional sites, or the shrubby edge of wetlands - Probability of observation of this species in the Regional Project Area has been determined by the [Atlas of the Breeding Birds of Manitoba](#) to be approximately 10% to 20%,*

Our records indicate that the identified location of the processing facility overlaps with multiple known breeding observations of the golden-winged warbler (listed as *Threatened* under the federal Species at Risk Act and provincial Endangered Species and Ecosystems Act). The proponent should be required to consult with the Wildlife and Fisheries Branch to develop a clearing strategy that maintains golden-winged warbler nesting habitat in the project area.

- The application states that:

CanWhite will, with the approval of the RM of Springfield, construct a permanent access road on the municipal road allowance directly south of the Processing Facility (Figure 1-2).

CanWhite has obtained permission from Manitoba Hydro to use the existing power line access road easement in NW-29-10-8E1 and NE-29-10-8E1 (Figure 1-2) to access the Project site area on a temporary basis during Project construction, and possibly early Project operations, while the permanent road is being completed (expected to last no longer than four months to one year).

The proposed temporary access also requires use of crown land. We recommend that the proponent construct the temporary and permanent road on the same route; i.e. on the municipal road allowance shown in the application as the proposed permanent road location.

- Clearing of Vegetation (excluding private lands)
Clearing of vegetation on crown lands and municipal road allowances will require timber damage appraisal and any associated fees/conditions related to removal of timber.

From: Kiss, Brian (ARD) <Brian.Kiss@gov.mb.ca>

Sent: August 31, 2020 5:28 PM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Subject: FW: Environment Act Proposal for TAC Review - CanWhite Sands Corp. - Vivian Sand Processing Plant - File 6057.00

Importance: High

Hi Jennifer,

Along the same lines as mentioned by the Eastern Region IRMT, the Wildlife and Fisheries Branch is concerned about potential conflicts with golden-winged warbler. The project is located within an area identified as critical habitat for golden-winged warbler, which is listed as *Threatened* under the federal Species at Risk Act and provincial Endangered Species and Ecosystems Act. The specific location of the processing facility overlaps with multiple known breeding observations of this species, suggesting that important habitat structure occurs at or near the site. The potential loss of nesting habitat is a concern, and should be avoided or offset during project construction activities. The proponent should be required to consult with the Wildlife and Fisheries Branch to develop a clearing strategy that maintains golden-winged warbler nesting habitat in the project area.

The Branch previously met with project consultants and identified potential conflicts with golden-winged warbler, other species at risk, and white-tailed deer within the proponent's claim areas. We look forward to seeing the future proposal identifying silica sand extraction areas, and learning how potential impacts to these species will be assessed and mitigated.

-Brian Kiss