

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Color Ad Packaging Ltd.
PROPOSAL NAME: Rotogravure Engraving Facility
CLASS OF DEVELOPMENT: 2
TYPE OF DEVELOPMENT: Manufacturing - Industrial
FILE NO.: 6123.00

OVERVIEW

The Proposal dated July 26, 2021 was received on August 10, 2021 with additional information on November 17, 2021. The advertisement of the Proposal was as follows:

“An Environment Act Proposal has been filed by Color Ad Packaging Ltd. for the continued operation of a rotogravure cylinder engraving facility at 630 Kernaghan Avenue in the City of Winnipeg. The facility manufactures rotogravure cylinders that will support the manufacturing of flexible packaging and labelling products in another licensed facility. The facility uses an air pollution control system to capture potential air emissions from the operation.”

The Proposal was advertised in the Winnipeg Free Press Saturday, January 15, 2022. It was placed in the Online Public Registry at:

<https://www.manitoba.ca/sd/eal/registries/6123/index.html>

The Proposal was distributed to Technical Advisory Committee (TAC) members on January 16, 2022.

The closing date for comments from members of the public and TAC members was February 12, 2022.

COMMENTS FROM THE PUBLIC

No public comments were received.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE

Technical Advisory Committee (TAC) responses are listed in Table 1 below. Substantive comments are provided following the table. TAC comments are provided in full in the public registries.

Table 1 **Color Ad Packaging Ltd - Rotogravure Engraving Facility**
Technical Advisory Committee Comments

No	Technical Advisory Committee Member	Response Provided
1	Manitoba Environment, Climate and Parks:	
	Environmental Approvals Branch	
	Energy Program	No response
	Air Quality Management	February 14, 2022
	Environmental Compliance and Enforcement Branch	January 21, 2022
	Office of Drinking Water	January 17, 2022
	Environmental Programs and Remediation Branch	No response
	Drainage and Water Rights Licensing Branch	No response
	Water Use Licensing Section	No response
	Water Control Works and Drainage Licensing Section	No response
	Climate Change and Clean Technology	No response
	Parks and Protected Spaces Branch	No response
	Water Branch	
	Water Quality Management Section	No response
	Groundwater Management Section	No response
2	Natural Resources and Northern Development	
	Wildlife and Fisheries Branch (wildlife)	January 18, 2022
	Wildlife and Fisheries Branch (fisheries)	No response
	Forestry and Peatlands Branch	January 16, 2022
	Lands Branch	No response
	Regional Land Specialist/ Integrated Resource Management Team	No response
	Mines Branch	January 24, 2022
	Petroleum Branch	February 1, 2022
3	Manitoba Sport, Culture, and Heritage – Historic Resources Branch	January 18, 2022
4	Manitoba Municipal Relations: Community Planning Branch	No response
	Labour, Consumer Prot. and Gov't Services - Inspection and Technical Services	No response
5	Manitoba Transportation Infrastructure – Environmental Services and Consultation Branch	February 4, 2022
6	Manitoba Health– Environmental Health Unit	February 1, 2022

Manitoba Conservation and Climate – Air Quality Management Section

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

- No significant impact on ambient air quality is expected, provided that the plant is equipped with advanced scrubber system to control potential air emission to the atmosphere.
- requirement regarding noise and odour nuisance should be included in the environmental licence.

Disposition:

The proposal indicated that the plant is equipped with a scrubber system. In addition clauses 9, 12 and 13 of the draft Environment Act Licence address concerns related to potential air emissions from the facility while clauses 10 and 11 address issues related to odour and noise.

Manitoba Environment, Climate and Parks- Environmental Compliance and Enforcement Branch

Environmental Compliance and Enforcement provided the following comments:

- Please provide confirmation of the lease agreement between Color Ad and the landowner.
- Spill containment, and spill clean-up materials and procedures are to be in place for the chemicals stored on site.
- In the event of a fire, release, spill, leak or discharge of a pollutant or contaminant to the environment, immediately report the incident to Environment, Climate and Parks 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.
- Ensure the Health & Safety Plan and the Fire Safety Evacuation Procedure include procedures to address:
 - spill clean-up
 - notification of fire and other environmental emergencies to the Emergency Response Line

Disposition:

The proponent provided the requested lease agreement. Environmental Compliance and Enforcement Branch reviewed the additional information and has no further concern. In addition clauses 37 and 39 of the draft Environment Act Licence addresses issues related to emergency response reporting and preparation of emergency response plan.

Natural Resources and Northern Development - Forestry and Peatland Branch

Any future locations that occupy any part of a Manitoba Provincial Forest require a Provincial Forest General Permit that can be made online at <https://www.manitobaelicensing.ca/licensing.pag>.

Disposition:

The comment was provided to the proponent for information and compliance.

Manitoba Sport, Culture, and Heritage – Historic Resources Branch

If at any time heritage resources are encountered in association with these lands during testing and development, the Historic Resources Branch may require that an acceptable heritage resource management strategy be implemented by the developer to mitigate the effects of development on the heritage resources.

Disposition:

The comment was provided to the proponent for information and compliance.

Manitoba Health – Environmental Health Unit

Winnipeg Regional Health does not have any specific concerns, however, the following comments were submitted.

- There is no specific plans to mitigate the risk of a fire. It would be reassuring if they had measures in place to prevent fires in the facility to avoid potentially impact to nearby residential buildings.
- Site maps were not included. Since there was a reasonable description, Google Maps can be used.
- It is not correct there are no climate impacts related to this industry. Emissions from trucks would not be “negligible”.

Disposition:

Claus 33 of the draft Environment Act Licence requires compliance with the Office of Fire Commissioner to address fire issue while clause 39 requires the proponent to prepare emergency response plan. The proponent provided a site map and it is included in the draft licence for reference.

ADDITIONAL INFORMATION

Additional information was provided on March 4, 2022 to address Technical Advisory Committee concerns with respect to lease agreement and site plan.

PUBLIC HEARING

As no requests were received for a public hearing, a public hearing is not recommended.

CROWN-INDIGENOUS CONSULTATION

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with Indigenous communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of the Indigenous rights of that community.

The proposed plant is an existing facility located in the City of Winnipeg zoned for industrial use. As a result no effects on Indigenous rights are anticipated, Crown-Indigenous consultation is not required.

RECOMMENDATION

It is recommended that the Development be licensed under The Environment Act subject to the limits, terms and conditions as described on the attached draft Environment Act licence.

Administration of the licence should be assigned to the Winnipeg Region of the Environmental Compliance and Enforcement Branch.

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