



January 29, 2025

Mr. Eshetu Beshada, PhD., P.Eng.
Senior Environmental Engineer
Manitoba Environment and Climate Change
Environmental Approvals Branch
Box 35, 14 Fultz Blvd.,
Winnipeg, MB R3Y 0L6
Via Email: Eshetu.beshada@gov.mb.ca

**Subject: Heidelberg Materials Environment Act Proposal Technical Advisory Committee Response,
File 6245.00**

Attention: Mr. Beshada,

WSP Canada Inc. (WSP) was retained by Heidelberg Materials Canada Limited (Heidelberg) to complete an Environment Act Proposal (EAP) under the requirements of *The Environment Act*. The EAP was submitted to the Environment Approvals Branch (EAB) on November 4, 2024, for review. On January 10, 2025, the EAB returned questions and comments from the Technical Advisory Committee (TAC) for consideration by Heidelberg. Outlined here are the responses to these questions and comments.

Request: Provide more noise assessment including identification of all noise generating activities at the facility and any potential noise impact on the adjacent residential neighbourhood.

Response: The concrete plant's manufacturing process is sheltered within a concrete shell building. All mechanical drive for the molding stations and belt conveyors are by electrical motors. While there is a requirement for Health and Safety hearing protection within the building there are no significant noise generators within the building. Heidelberg periodically completes an Occupational Health Personal Exposure Monitoring within the building; in 2019, the 8-Hour Lex Exposure monitoring was determined to be 91.8 decibels (dB).

Exterior to the building, noise generating activities may include those associated with the operation of a diesel engine construction bucket tractor for the loading of sand and gravel to the conveyor hopper, as well as delivery of raw resources such as gravel, sand, and rebar and shipping of manufactured concrete pipe that is completed by standard diesel highway transport trucks. The rubber tire loader operations typically operate between 1 and 2 hours daily and typically between the hours of 14:00 and 15:30 from Monday to Friday. The noise generated from a flat bed truck and a front end loader is generally reported as an average Lmax at 15 metres (m) (50 feet [ft]) of 74 and 79 dB respectfully (US Department of Transportation, USDOT 2017- TN5383--9 Construction Equipment Noise Levels and Ranges - Handbook - Construction. Accessed 24January2025).

The gravel conveyor from the hopper to the building tower is driven by electric motor and conveyed along a steel structure with roller bearings; this structure is not a noise generating structure and should a significant noise be observed from the conveyor it is an indicator that maintenance is required in a timely manner to address the impairment.

As indicated in the EAP, a hydro-vacuum truck will attend the site to evacuate the industrial wastewater holding tank on-site up to three times a week for less than 1 hour at a time. The noise generated from a hydro-vacuum truck is generally reported as an average Lmax at 15 m (50 ft) of 85 dB (US Department of Transportation, USDOT 2017- TN5383--9 Construction Equipment Noise Levels and Ranges - Handbook - Construction. Accessed 24January2025).

Request: Any noise mitigation plan proposed to minimize impacts to the adjacent residential neighbourhood.

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Response: The City of Winnipeg Neighborhood Liveability By-Law, Part 5 Noise Control, identifies that operation of heavy equipment, machinery or other noise generating activities are prohibited before 07:00 hrs and after 21:00 hrs Monday to Friday within 150 m of a residential property. The concrete plant is located approximately 250 m or more from the nearest residential developments. The concrete plant's hour of operations is from 07:00 hrs to 15:30 hrs, Monday to Friday. Implemented mitigations for noise impacts on residential neighbors includes operations within permitted hours of the City of Winnipeg Liveability by-law, manufacturing process completed within the plant concrete building, and heavy equipment on-site are muffled.

To date, there have been no reported noise complaints made to Heidelberg. Should a complaint (i.e. noise) be reported to Heidelberg, management at the facility would then implement their Issues Response Guideline that provides a consistent process for the investigation, mitigation and follow-up of concerns raised by stakeholders. A copy of the management guideline can be reviewed in the EAP Appendix D (Heidelberg Environmental Management Plan [EMP]).

Groundwater Management Section Request: Assessment be conducted to locate all wells on the Site or in areas that could potentially be impacted by operational activities.

Response: The West Kildonan Industrial Park, Heidelberg Plant and neighbours are all connected to the City of Winnipeg water supply network. As identified in the EAP, there are 31 wells identified within 1 kilometre (km) of the Site with five identified as active, five identified as sealed and the balance are unknown status. On-site there are two wells listed (9109 and 104718) and mapped (see attached Figure). Well ID 9109 is listed as drilled in 1966 to 25.29 m and identified as unknown status. Well ID 104718 was drilled in 1971 (unknown depth) and is identified as active. Both the wells are recorded to be installed before the Site was developed in 1974. A search of the grounds by Heidelberg staff as well as internal staff discussions have not identified the locations of these two wells on the grounds and suspected as not being located on the Heidelberg property.

Render (1970) indicates that groundwater flow direction in the carbonated aquifer is primarily from the northwest direction towards the Red River. The Red River is approximately 1,575 m distant from the Heidelberg property with three groundwater wells indicated down gradient from the Site.

Request: Copy of the GWDriII Groundwater well logs are not provided in Appendix B of the EAP.

Response: A table of the GWDriII (2022) Groundwater well logs are attached here along with a figure of their location identified within 1 km of the Site. The figure identifies the status of the groundwater wells based on GWDriII (2022) designation (Active, Sealed and Unknown).

Request: It is recommended that a contingency plan be developed to address potential negative impacts on water quality or quantity that may affect groundwater users during operations.

Response: Heidelberg acknowledges the need for contingency planning in the event of environmental emergencies and as such Heidelberg's EMP (included in Appendix D of the EAP) provides a consistent process for the investigation, reporting and mitigation in the documented Spill Response Plan that address environmental spills and accidental releases and Neighbour Water Supply that also provides guidance to investigate, mitigate and follow-up of water well and supply concerns raised by stakeholders.

If you have any questions or concerns about this supplemental information to support Heidelberg's EAP submission, please contact the undersigned at your convenience.

Kind regards,



Darren Keam, M.Sc., P.Ag.
Group Manager, Manitoba

DK/ds

cc: William McDougal (Heidelberg)
Encl.
WSP ref.: CA0024497.6396

GWD Drill Database Well Search Results

Project: CA0024497.6396

Site Location: 2520 Ferrier Street, Wpg, MB

Search Area: 1 Km Radius

Well PID	UTM X (m)	UTM Y (m)	Year of Registration	Drill Date	Casing Type	Casing From (m)	Casing To (m)	Well Depth (m)	Aquifer	Well Use	Usage	Well Status	UTM X and Y Accuracy	Well Location	Contractor Name
5136	634744	5536020	1963	05-Oct-63	Casing	0	14.021	14.63	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 26 in Parish of Kildonan	Paul Slusarchuk Well Drilling Ltd.
6549	634744	5536020	1964	08-04-1964	Casing	0	22.342	131.064	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 26 in Parish of Kildonan	Pruden Drilling Co. Ltd.
179288	635852	5535147	1900	01-01-1900	Casing	-1.22	n/a	12.81	Unknown	Production	Domestic	Sealed	Accurate [50-350M] [within 1/4 section]	RL 25 in Parish of Kildonan	Unknown
11880	634007	5534281	1968	11-06-1968	Casing	0	19.812	31.09	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 13 in Parish of Kildonan	D.C.L. Drilling
7901	634785	5535695	1965	05-06-1965	Casing	0	23.774	33.528	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 25 in Parish of Kildonan	Pruden Drilling Co. Ltd.
72160	634785	5535695	1991	17-09-1991	Casing	-0.61	17.678	24.384	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 25 in Parish of Kildonan	Echo Drilling Ltd.
9109	634717	5535524	1966	08-07-1966	Casing	0	0	25.298	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 24 in Parish of Kildonan	Scientific Drilling Co.
104718	634717	5535524	1971	22-10-1971	Casing	n/a	n/a	n/a	Limestone or Dolomite	Production	n/a	Active	General [1-8KM] [within township]	RL 24 in Parish of Kildonan	Unknown
22138	634678	5535373	1974	20-11-1974	Casing	0	23.622	41.453	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 23 in Parish of Kildonan	Karl Stasiuk and Son
14572	634678	5535373	1970	08-10-1970	Casing	0	28.651	29.261	Sand and Gravel	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 23 in Parish of Kildonan	Paul Slusarchuk Well Drilling Ltd.
37819	634668	5535265	1979	18-05-1979	Casing	-0.457	18.898	24.384	Limestone or Dolomite	Production	Industrial	Unknown	Accurate [50-350M] [within 1/4 section]	RL 22 in Parish of Kildonan	Porta Drill Wells
198918	634732	5535228	2018	28-08-2018	Casing	0.61	26.23	30.5	Limestone or Dolomite	Production	Comm/ Indust	Active	Exact [<5M] [GPS]	RL 22 in Parish of Kildonan	Perimeter Drilling Ltd.
9110	634671	5535160	1966	25-04-1966	Casing	0	23.165	28.956	Limestone or Dolomite	Production	Domestic	Active	Accurate [50-350M] [within 1/4 section]	RL 21 in Parish of Kildonan	Atlas Drilling
14571	634671	5535160	1970	09-04-1970	Casing	0	21.641	27.737	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 21 in Parish of Kildonan	Paul Slusarchuk Well Drilling Ltd.
7899	634672	5535046	1965	20-10-1965	Casing	0	26.822	36.271	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 20 in Parish of Kildonan	Pruden Drilling Co. Ltd.
25468	634672	5535046	1975	12-06-1975	Casing	0	26.518	49.987	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 20 in Parish of Kildonan	Aquarius Well Drilling
17701	634609	5534897	1972	12-05-1972	Casing	1.219	17.069	17.069	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 19 in Parish of Kildonan	Paul Slusarchuk Well Drilling Ltd.
10536	634609	5534897	1967	10-11-1967	Casing	0	18.898	21.641	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 19 in Parish of Kildonan	Paul Slusarchuk Well Drilling Ltd.
48747	634466	5534783	1983	04-08-1983	Casing	-0.61	19.202	38.1	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 18 Parish of Kildonan	Paul Slusarchuk Well Drilling Ltd.
68295	634466	5534738	1989	16-08-1989	Casing	0	22.555	143.256	Limestone or Dolomite	Test Well	n/a	Unknown	Accurate [50-350M] [within 1/4 section]	RL 18 Parish of Kildonan	Perimeter Drilling Ltd.

Well PID	UTM X (m)	UTM Y (m)	Year of Registration	Drill Date	Casing Type	Casing From (m)	Casing To (m)	Well Depth (m)	Aquifer	Well Use	Usage	Well Status	UTM X and Y Accuracy	Well Location	Contractor Name
45986	634385	5534620	1982	11-05-1982	Casing	0	18.288	24.689	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 17 Parish of Kildonan	Stonewall Drilling
11878	634385	5534620	1968	16-12-1968	Casing	0	18.898	24.689	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 17 Parish of Kildonan	Pruden Drilling Co. Ltd.
11881	634198	5534471	1968	06-06-1968	Casing	0	19.507	20.117	Sand and Gravel	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 15 Parish of Kildonan	Paul Slusarchuk Well Drilling Ltd.
11882	634198	5534471	1968	08-08-1968	Casing	0	17.983	23.47	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 15 Parish of Kildonan	Paul Slusarchuk Well Drilling Ltd.
11883	634121	5534395	1968	01-05-1968	Casing	0	20.726	47.549	Limestone or Dolomite	Production	Domestic	Unknown	Accurate [50-350M] [within 1/4 section]	RL 15 Parish of Kildonan	Pruden Drilling Co. Ltd.
116777	635176	5535173	2001	27-11-2001	Casing	0	25.01	35.075	Limestone or Dolomite	Observation	n/a	Active	Exact [<5M] [GPS]	RL 23 in Parish of Kildonan	Friesen Drillers Ltd.
195740	635503	5535096	2017	19-02-2017	Casing	0.61	24.4	25.925	Limestone or Dolomite	Recharge/Return	Earth Energy	Active	Exact [<5M] [GPS]	RL 24 in Parish of Kildonan	Maple Leaf Drilling Ltd.
179443	635729	5535223	1900	01-01-1900	Casing	-2.135	3.965	3.965	Unknown	Production	Domestic	Sealed	Accurate [50-350M] [within 1/4 section]	RL 25 in Parish of Kildonan	Unknown
207094	635674	5535012	1900	01-01-1900	Casing	4.27	33.55	33.855	Unknown	Unknown	Comm/Indust	Sealed	Exact [<5M] [GPS]	RL 24 in Parish of Kildonan	Maple Leaf Drilling Ltd.
179444	635906	5535122	1900	01-01-1900	Casing	0	14.64	23.79	Unknown	Production	Domestic	Sealed	Accurate [50-350M] [within 1/4 section]	RL 25 in Parish of Kildonan	Unknown
179438	635906	5535122	1900	01-01-1900	Casing	1.525	18.91	22.875	Unknown	Production	Domestic	Sealed	Accurate [50-350M] [within 1/4 section]	RL 25 in Parish of Kildonan	Unknown

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LEGEND

- Site Boundary
- West Kildonan Industrial Park Boundary
- Parks and Open Spaces
- Parcels

Groundwater Wells (GWDriil Database, 2022)

- Active
- Sealed
- Unknown

0 100 200 300 400 500

1:7,500 Meters

Coordinate System: NAD 1983 UTM Zone 14N

REFERENCE(S)

1. IMAGERY SOURCE: ESRI, MAXAR, EARTHSTAR GEOGRAPHICS [2023]

CLIENT

HEIDELBERG MATERIALS

PROJECT

ENVIRONMENT ACT PROPOSAL
CONCRETE PIPE MANUFACTURING PLANT
2520 FERRIER STREET, WINNIPEG

TITLE

GROUNDWATER WELLS

CONSULTANT	YYYY-MM-DD	1/28/2025
	REPORT BY	D.KEAM
	DRAWN BY	J.HECK
	REVIEWED BY	D.KEAM
	OFFICE	CALGARY

PROJECT NO.	PHASE	FIGURE
CA0024497.6396	100	3