

SUMMARY OF COMMENTS / RECOMMENDATIONS

PROPONENT: **Rehau Industries Inc.**
PROPOSAL NAME: **Rehau Industries Inc.**
CLASS OF DEVELOPMENT: **CLASS 1**
TYPE OF DEVELOPMENT: **Manufacturing and Industrial Plant**
CLIENT FILE NO: **3993.00**

OVERVIEW:

A proposal has been submitted by Mr. Karel Van Helden of Rehau Industries Inc. for the alteration of an existing unlicensed development located in Lots 1 and 2 of Plan 25647 WLTO in the Outer Two Miles of Lot 43 Parish of St. John in the NE ¼ 24-11-2 EPM at Unit 150, 11 Plymouth Street in the City of Winnipeg. The development involves the manufacture and finishing of vinyl window profiles.

Specific processes include extrusion of plastic/additive mixed blends into window frame profiles, and the lamination of foiled finishings by use of organic based adhesives. There is potential for noise, particulates and solvent vapour emissions to the air. A baghouse is provided for particulate collection. The development is expected to operate 24 hours per day, seven days per week.

The Department provided the Technical Advisory Committee with information on the Proposal and made public notification in the Winnipeg Free Press. The following summarizes the responses:

RELEVANT COMMENTS FROM THE PUBLIC

No comments were received from the public.

RELEVANT COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

1. **Manitoba Culture, Heritage & Tourism – Historic Resources** – has no concerns.

No response necessary.

Disposition: No action needed.

2. **Manitoba Industry, Trade and Mines – Industry Development Division** – reply that they are supportive of the project.

No response necessary.

Disposition: No action needed.

3. **Manitoba Intergovernmental Affairs – Provincial Planning Services** – has no concerns as long as the project will not have adverse effects on the workplace and adjacent residential environment.

No response necessary.

Disposition: No action needed.

4. **Manitoba Industry Trade and Mines – Petroleum and Energy Branch** – had no concerns.

No response necessary.

Disposition: No action needed.

5. **Manitoba Conservation – Environmental Quality Standards – Air Quality Management Section**
– had the following comments:

- a) Although this facility is in an industrially-zoned area, it is also located next to a residential area and within 1 km of the facility are schools, a community centre, commercial areas, and residences. Consequently, the maximum ambient concentrations of the specific VOC's emitted by this facility should be determined using air dispersion modelling. For this assessment, the resulting concentrations could then be compared to Ontario Ministry of Environment ambient air quality criteria as follows:
- i) ethyl acetate: 19,000 µg/m³ (1/2-hour average)
 - ii) methyl ethyl ketone: 3,000 µg/m³ (1/2-hour average); 1,000 µg/m³ (24-hour average)
 - iii) chlorobenzene: 4,200 µg/m³ (1/2-hour average); 3,500 µg/m³ (1-hour); 4,500 µg/m³ (10-minute).

The above comments were sent to the proponent for response. The responses were forwarded to the commentor for concurrence.

- b) Presumably, the emissions presented are from the foiling operation only. It should be confirmed that VOC emissions from the rest of the facility are negligible.

The above comments were sent to the proponent for response. The responses were forwarded to the commentor for concurrence.

- c) There is a discrepancy between the total hourly VOC emissions (3.03 kg/hour) and the total of the hourly emissions for the three specific VOC's listed (*i.e.*, 3.352 kg/hour). The reason for this discrepancy should be provided.

The above comments were sent to the proponent for response. The responses were forwarded to the commentor for concurrence.

- d) It should be verified that the emissions of the specific VOC's are based on the maximum percentage concentration of the specific VOC in each of the products used (*e.g.*, solvent adhesive, *etc.*) rather than an average of the percentage concentration.

The above comments were sent to the proponent for response. The responses were forwarded to the commentor for concurrence.

Disposition: Air dispersion modelling was conducted as per comment a). The completion of the ADM addressed the concerns expressed in items a) to d).

6. **Environment Canada – Canadian Environmental Assessment Agency** – comment that the application of the *Canadian Environmental Assessment Act* with respect to this project will not be required.

No response necessary.

Disposition: No further action needed.

7. **Manitoba Conservation – Policy Coordination Branch** – passed on concerns of Red River Region and Air Quality Management.

See responses to these specific comments..

Disposition: No further action needed.

8. **Manitoba Conservation – Environmental Operations Division – Red River Region** – has the following comments:

- a) Nuisance odours may be a problem.
- b) Noise emissions may be a concern.
- c) Particulate emissions from the silos may be a concern if not controlled

The above comments were sent to the proponent for response. The responses were forwarded to the commentor for concurrence.

Disposition: Items a) and b) are addressed in the licence. The response to Item c) i.e. that all emissions from the silos were filtered, was satisfactory to the commentor.

9. **Manitoba Agriculture – Soils and Crops - Soil Resource Section** – did not respond.

No response necessary.

Disposition: No action needed.

10. **Manitoba Transportation and Government Services - Highway Planning and Design** – has no concerns.

No response necessary.

Disposition: No action needed.

11. **Manitoba Health - Public Health - Environmental Unit – Winnipeg Regional Health Authority** – did not respond.

No response necessary.

Disposition: No action needed.

12. **Manitoba Labour - Workplace Safety and Health Division** – did not respond.

Disposition: No action needed.

PUBLIC HEARING:

Public hearings were not requested nor convened.

RECOMMENDATIONS:

A Licence considering the above relevant concerns as well as those of the Approvals Branch be prepared and issued. Responsibility for administration of the Licence be assigned to Red River Regional Operations.

PREPARED BY:

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