

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** 6409840 Manitoba Ltd. (Tritec Concrete)  
**PROPOSAL NAME:** Tritec Concrete – Concrete Batch Plant  
**CLASS OF DEVELOPMENT:** 1  
**TYPE OF DEVELOPMENT:** Manufacturing -  
**CLIENT FILE NO.:** 5658.00

### **OVERVIEW:**

Manitoba Conservation and Water Stewardship received a Proposal on June 14, 2013 for the continued operation of a concrete batch plant at 18 Main Street in St. Eustache in the Rural Municipality of Cartier, Manitoba. The plant will produce ready mix concrete for distribution at construction projects.

The Department, on July 30, 2013, placed copies of the Proposal in the Public Registries located at Legislative Library (200 Vaughan Street), the Winnipeg Millennium Public Library, the Manitoba Eco-Network located in Winnipeg and online at <http://www.gov.mb.ca/conservation/eal/registries/5658tritech/index.html>. Copies of the Proposal were also provided to the Technical Advisory Committee (TAC) members. A notice of the Environment Act proposal was also placed in the Portage Graphic on July 30, 2013. The newspaper and TAC notifications invited responses until August 27, 2013.

### **COMMENTS FROM THE PUBLIC:**

No Comments.

### **COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:**

#### **Canadian Environmental Assessment Agency**

No Comments.

#### **Manitoba Agriculture – Land Use Branch**

No Response.

#### **Manitoba Conservation and Water Stewardship – Watershed and Protected Area Branch**

No Concerns.

## **Manitoba Conservation and Water Stewardship –Compliance and Enforcement Branch**

*I have reviewed the proposal prepared by Tritec Concrete and wish to offer the following comments:*

- 1. The proposal identifies that dust can be an issue; I would like to see a better description of how dust is currently managed on-site.*
- 2. The proposal indicates that there is a discharge area for truck wash water, when I inspected the site in May 2013, there was no evidence of a bermed area for wash water. The owner told me that they rinse the trucks and use the wash water as a dust suppressant in the yard. Any leftover concrete in the trucks is poured into molds to form concrete blocks prior to rinsing of the trucks. The information in the proposal does not jive with current practices at the site. Some clarification might be required.*

Proponent Response (Sept 18, 2013):

- Dust suppressants are used on the gravel in the yard to try and reduce those emissions. The gravel piles are also sprayed with water every now and then to try and reduce the dust emissions as well. Loading of the cement silos does produce dust emissions. Those are controlled by a bag house.
- The berm was created after the site visit in May for our own due diligence along with a number of cleanup activities (hauling scrap metal away, returning expired fuel tanks...etc) The left over concrete is in fact poured into molds to form concrete blocks. It is only the wash out (from the concrete truck's drums) that is washed out within the confines of the berm. We found that by doing it in this manner the dust emissions were reduced.

Compliance and Enforcement Comments (Sept 27, 2013):

*I have reviewed the additional information provided and I do have some follow-up questions regarding the truck wash out area:*

- 1. What material was used to construct the berm? The proposal says the holding area is 100' by 80' by 1' deep, is the containment constructed so that the berm is uniform all the way around?*
- 2. According to the site plan provided, the washout area is located next to the municipal ditch. What measures are in place to prevent the wash water from going into the ditch?*
- 3. Are any detergents used to rinse out the trucks?*
- 4. What does the proponent propose to do with the wash water contained within the berm if it does not evaporate quickly enough between each use?*

Proponent Response (Sept 26, 2013):

1. The 80' x 100' berm is constructed with crushed rock and cement powder. It has 3 sides so that the trucks can back into the berm.
2. The area is below grade. With a solid foundation already in place for the berm, the washout of sand and gravel adds to the berm construction.
3. No, there are no detergents used in the washout process.
4. In case of excess water or a heavy rainfall, the water and sediment is given time to separate from each other. The clean water is then pumped out.

Disposition

The proponent provided additional information addressing dust management, description of wash water pond, management of wash water and issue of detergent use for truck wash. Environmental Compliance and Enforcement has reviewed the responses and has no further comments. In addition the draft Environment Act Licence clauses 9, 12 and 13 addresses air emission while clauses 27 to 31 address wastewater management and truck wash requirements.

**Manitoba Conservation and Water Stewardship – Programs and Strategies Branch – Air Quality Section**

*The followings are the comments on the proposal:*

- *Tritec Concrete is a concrete batch plant which manufactures ready mix concrete for distribution. The materials that will be handled and used in the manufacturing process are: concrete powder ash, coarse and fine aggregates, admixtures, and water. The air quality section has concerns regarding emissions from this type of plant. Inadequate control measures may result increasing level of PM<sub>2.5</sub> and PM<sub>10</sub> surrounding concrete batch plant. Types of controls may include baghouses, water sprays, enclosures, hoods, curtains etc.*
- *The following information are required to assess the potential impact on air quality in the surrounding concrete batch plant:*
  1. *Complete process description of the concrete batch plant.*
  2. *Type of concrete batch plant (truck-mixed/central-mixed).*
  3. *Maximum operating schedule (hours/day, days/year).*
  4. *Maximum production rate (tons/hour, tons/year, yd<sup>3</sup>/hour, yd<sup>3</sup>/year).*
  5. *List of emission activities.*
  6. *Control methods to be used for emissions.*
- *Provided that the dust removal devices (bag houses) and other pollution control measures (e.g., use of curtains, pavement of high vehicle traffic area, sweeping etc.) are appropriately operated and maintained. The Manitoba Heavy Construction Association (MHCA)'s "Best Management Practice for Ready Mix Concrete Plants Manual" is also followed. It is expected that concerns regarding air pollution will be addressed.*

- *It is suggested that the EA Clause regarding noise nuisance be included.*

#### Proponent Response (Sept 18, 2013):

- Complete process description of the concrete batch plant is that the process starts with loading the bins in the batch plant with sand and gravel. These materials along with cement powder are weighed then conveyed into the drums of the concrete trucks. Next water and additives are added to the drums at the same time. The mixture is then mixed and the trucks are sent to the job site.
- Maximum operating schedule 8hours/day, 5 days a week. The batch plant runs year round, weather permitting with it's busiest season between May-November.
- Maximum production rate From August 1, 2012- July 31, 2013 the batch plant produced 9400 cubic yards which is equal to 25.75 cubic yards/calendar day.
- List of emission activities and control methods to be used for emissions - Fuel emissions are emitted from the concrete trucks and the loader. All the trucks as well as the loader are up to date therefore they emit the least amount of emissions possible. The trucks and loader are turned off when they are idling to try and lower the fuel emissions emitted as well. There is a boiler in the batch plant that is only used in the winter months to heat the concrete materials. It runs off heating fuel. The boiler is run at a maximum of 100hrs/ winter to lower its emissions. The vehicles and concrete trucks that enter the yard do create some dust emissions. Dust suppressants are used on the gravel in the yard to try and reduce those emissions. The gravel piles are also sprayed with water every now and then to try and reduce the dust emissions as well. Loading of the cement silos does produce dust emissions. Those are controlled by a bag house.

#### Disposition

The proponent provided additional information addressing process description, capacity, hours of operations and dust control method. The Air Quality Section reviewed the response and has no further comment. In addition Clauses 9, 10, 12 and 13 of the draft Environment Act Licence address air emission limits, noise issues and air pollution control requirement. Clause 5 addresses adherences to MHCA's Best Management Practice for Ready Mix Concrete Plants Manual.

#### **Manitoba Conservation and Water Stewardship – Wildlife Branch**

*Wildlife branch offered this comments. The cement batch plant is only 10 meters from Mill Creek, which empties into the Assiniboine River. Plastic cement and presumably powdered cement is highly alkaline and may kill aquatic animals and insects. Appropriate measures should be taken to ensure that both plastic cement and powdered cement are not allowed to enter Mill Creek at any time.*

## Disposition

Clauses 27 to 31 of the draft Environment Act Licence require proper handling of runoff, wash water and wastewater. Clauses 9, 12 and 13 of the draft Environment Act Licence address air emission limits, and air pollution control requirement.

### **Manitoba Conservation and Water Stewardship – Parks and Natural Areas Branch**

No Comments.

### **Manitoba Conservation and Water Stewardship – Forestry Branch**

No Response.

### **Manitoba Conservation and Water Stewardship – Aboriginal Relations Branch**

No Response.

### **Manitoba Conservation and Water Stewardship – Lands Branch**

No Response.

### **Manitoba Conservation and Water Stewardship – Water Quality Management Section**

No Response.

### **Manitoba Conservation and Water Stewardship – Groundwater Management Section**

No Response.

### **Manitoba Conservation and Water Stewardship– Fisheries Branch**

*Fisheries Branch has reviewed this proposal for the continued operation of a concrete batch plant at 18 Main Street in St. Eustache in the Rural Municipality of Cartier, Manitoba. The plant will produce ready mix concrete for distribution at construction projects.*

*Mill Creek runs along the one boundary of the concrete plant and does support fish species. The proponent indicates that the wash out area is surrounded by a berm and they let the water evaporate. We would want a clause that ensures there is no release of wash out water to the creek or any other area that might lead to a surface water. It does appear from the aerial provided that some of the riparian area adjacent to the creek has been retained. Would it be possible to include a clause that requires the current treed area remain intact?*

Disposition

Clause 30 of the draft Environment Act Licence prohibits discharge of any wastewater beyond the property boundary of the Development.

**Manitoba Conservation and Water Stewardship – Office of Drinking Water**

No Response

**Manitoba Conservation and Water Stewardship– Water Use Licensing Section**

No Concerns

**Manitoba Conservation and Water Stewardship – Water Control Works Licensing Section**

No Concerns

**Manitoba Conservation and Water Stewardship– Climate Green Initiative Branch**

No Response.

**Manitoba Conservation and Water Stewardship– Regional Services Branch**

No Response

**Manitoba Culture, Heritage and Tourism – Heritage Branch**

No Response.

**Manitoba Innovation Energy and Mines – Energy Development Branch**

No Response.

**Manitoba Innovation Energy and Mines – Petroleum Branch**

No Response.

**Manitoba Infrastructure and Transportation – Flood Forecasting Branch**

No Response.

**Manitoba Infrastructure and Transportation – Highway Planning and Design Branch**

No Concerns.

**Manitoba Intergovernmental Affairs**

No Concerns.

**Manitoba Health – Environmental Health Unit**

*I don't have any specific health concerns for the community other than for measures to be put into place to minimize dust and noise for any surrounding households. From the quality of the aerial photographs I cannot tell how close the nearest residential building is.*

**Disposition**

Clauses 9, 10, 12 and 13 of the draft Environment Act Licence address air emission limits, noise issues and air pollution control requirement.

**Manitoba Labour – Office of Fire Commissioner**

*With respect to the continued operation of the batch plant, the Office of the Fire Commissioner recommends that a fire safety /emergency response plan, in conformance with 2.8 of the Manitoba Fire Code, be filed with the RM of Cartier Fire Department.*

**Disposition**

The proponent is notified of the recommendation to comply with the Manitoba Fire Code. In addition the Licence cover letter requires the licensee to comply with any other legislative requirements.

**Manitoba Labour – Work Place Safety & Health**

No Response

**PUBLIC HEARING:**

A public hearing is not recommended.

**CROWN-ABORIGINAL CONSULTATION:**

The Government of Manitoba recognizes that it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

This project is located on a private land currently used for the operation of a concrete batch plant. There would be no infringement of aboriginal or treaty rights under Section 35 of the Constitution Act, 1982. Therefore, it is concluded that Crown-Aboriginal consultation is not required for the project.

**RECOMMENDATION:**

The Proponent should be issued a Licence for the continued operation of a concrete batch plant in accordance with the specifications, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Environmental Compliance and Enforcement Branch of Manitoba Conservation and Water Stewardship.

A draft Environment Act Licence is attached for the Director's consideration.

Prepared by:

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