

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: MILLER ENVIRONMENTAL CORPORATION

PROPOSAL NAME: Industrial Waste Collection Facility

CLASS OF DEVELOPMENT: N/A

TYPE OF DEVELOPMENT: Hazardous Waste – DGH&T Act

CLIENT FILE NO.: 5230.00

OVERVIEW:

On October 2, 2006, the Department received an Application from Miller Environmental Corporation for the construction and operation of a hazardous waste collection facility at 1803 Hekla Avenue in Winnipeg, to be known as the Winnipeg Service Centre.

On October 4, 2006 the Department placed copies of the Application in the Public Registries located at 123 Main St. (Union Station), the Winnipeg Centennial Public Library and the Manitoba Eco-Network. As well, copies of the Application were provided to the Technical Advisory Committee (TAC) members. The Department placed a public notification of the Application in the Winnipeg Free Press on October 7, 2006. The newspaper and TAC notification invited responses until November 3, 2006.

COMMENTS FROM THE PUBLIC:

None

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Historic Resources had no concerns.

Intergovernmental Affairs have no comments.

Canadian Environmental Assessment Agency noted that application of the Canadian Environmental Assessment Act with respect to this application will not be required, however Health Canada had the following comments:

1. Section 1. (viii) of the proposal indicates that an the impact on the environment is expected to be negligible due to the small volumes of materials managed compared to the Central Industrial Waste Management Facility in the RM of Montcalm.

It is unknown whether this conclusion, based on a comparison of volumes, is valid. The project has the potential to collect a very broad range of hazardous household chemicals that may/or may not be handled at the industrial waste facility.

Some of these chemicals will not be properly labelled or contained (intentionally or accidentally). Examples may include explosives, pesticides, radioactive material, PCBs, highly flammable substances, corrosives etc. Hazardous glass or pressurized or leaking containers will also be handled at the project. Due to the range in types of substances and handling procedures involved, a site specific risk assessment may be appropriate.

2. Is there any ground water use in the area? Will secondary containment (e.g. geotextile) be necessary under interior and exterior areas to protect the water and soil resources?

Disposition:

The comments were forwarded to the proponent and the following response was received:

1. Since waste from all Household Hazardous Waste (HHW) events is collected once or twice a month and sent to our processing facility within a few days following the event, the volumes and duration of the waste in the depot is negligible compared to the processing facility. Confirmation of the Winnipeg site risks being much less than our waste processing facility in the RM of Montcalm can be viewed in The Manitoba Industrial Waste Management Corporation Site Specific Risk Assessment, Montcalm Site - Volume 2 - Technical Appendices. February 1992. This document is located in the Manitoba Hazardous Waste Management Corporation licence folder located at Manitoba Conservation.
2. To confirm if there was any ground water use in the area, Mr. Eric Carlson from Manitoba Water Stewardship was contacted to do a check on existing water wells. Mr. Carlson's findings show that there are no ground water wells located on the 1803 Hekla Ave. site. The Well Information Report sent by Mr. Carlson shows the closest wells in the area (refer to attachments following this letter). A phone call to Mr. Carlson confirmed that at the 1803 Hekla Ave. site, the breakdown would be as follows:

0 – 35 feet	Clay
35 – 60 feet	Till
60 feet	Bedrock

Secondary containment will not be necessary in exterior areas as all waste handling is done within a contained area on the property. Interior areas do not have any access directly to water and soil resources so secondary containment will not be necessary. Spill equipment is readily available for any interior and exterior spills that may occur. Daily inspections are conducted to ensure that containers are secure and aren't leaking.

Water Stewardship had the following comments:

- According to section d, there will be no adverse impact on groundwater. It is unclear whether any monitoring will be provided to check the integrity of the groundwater quality.
- The proposed activities should not degrade the groundwater and surface water qualities on adjacent properties and make these unsuitable for use as drinking water sources. The consultant should identify such activities and recommend appropriate mitigation measures if required.

Disposition:

The comments were forwarded to the proponent and the following response was received:

Since there is no processing conducted at the site and there are no sources of ground water in this area, monitoring will not be necessary.

Conservation, Sustainable Resource & Policy Management had the following comments:

1. iv) Description of the existing land use...: Given that the area is described as being “predominantly residential and commercial with limited light industrial activity”, the distance of this facility from the nearest residential, commercial, or other sensitive receptors needs to be provided.
2. viii) Description of the potential impacts of the facility on the environment...: The main activity identified as producing air emissions was the bulking of waste. Questions that should be addressed include:
 - How is this bulking of waste done?
 - Is this bulking done inside of the trucks or warehouse or is it done outside?
 - What steps are taken to minimize air emissions or spillage of the waste? For example, are the emptied containers sealed to prevent leakage or air emissions?

To address potential odour concerns of the nearby residential and commercial areas, the odour nuisance clause should be included in the DGHTA licence for this facility.

Disposition:

The comments were forwarded to the proponent and the following response was received:

1. Miller does not currently have the actual distances from the site at 1803 Hekla Avenue to any residential, commercial or other sensitive receptors in the area. The approximate distance to the residential area north of the site is 0.3 km. What is provided below is an aerial photo from Google Earth showing the closest residential area north of the site.

2. i) How is this bulking of waste done?

There are three types of bulking that occur at our site. There is waste transferred from vacuum truck to container, waste oil bulked into a storage tank and waste flammable material bulked into metal bung drums.

Industrial waste that is picked up from a customer's site with a vacuum truck is transferred or bulked into a container such as a tote, drum, etc. Miller notifies Manitoba Conservation of any transferring of waste from a vacuum truck to container by fax. The containers are then put onto a trailer that ships the contained waste to our processing facility located in the RM of Montcalm.

Other bulking operations that occur at our site are the bulking of oil and solvent through the Household Hazardous Waste program. Used oil that is dropped off by the public is stored in a 2000 L double walled tank located within a contained area. Flammable waste is bulked into a grounded 205 L metal bung drum located in the depot described in our proposal.

ii) Is this bulking done inside of the trucks or warehouse or is it done outside?

All bulking done by Miller is done outside within a contained area, unless otherwise approved by the Director.

iii) What steps are taken to minimize air emissions or spillage of the waste? For example, are the emptied containers sealed to prevent leakage or air emissions?

There are occasions where Miller will use a vacuum truck at a customer's site and have to transfer the waste into a container. These would be situations where a vacuum truck did not have a full load and was not feasible to drive down to our facility. This is a standard practice performed by transfer stations in Winnipeg. Oil containers that are bulked into the oil tank are capped, placed into a heavy duty plastic drum liner and then placed into a contained tray within the contained area for short term storage. They are sent to our facility to be shredded under the Manitoba's Used Oil Products Recycling Program which is run by the Manitoba Association for Resource Recovery Corp. (MARRC). Solvent that is bulked is done inside the HHW depot. As mentioned in our proposal, the depot is self-contained, specifically engineered to store household hazardous wastes in compliance with applicable regulations and thereby minimizing environmental impacts. It is engineered to provide spill containment, and will be located within a contained area designed to be capable of retaining any spilled material.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE re Draft Licence:

Water Stewardship had the following comments:

The Office of Drinking Water wanted to know whether any backflow prevention will be provided. This issue was not addressed with the proponent response. Please provide the above information in case the proposed facility will be connected with the municipal water supply.

- Please note that backflow prevention should be provided on water systems as per the provincial plumbing code and the WCS AWWA Cross Connection Control Manual or CSA B64.10-01 Manual for the Selection and Installation of Backflow Prevention Devices. Backflow protection should be commensurate with the degree of backflow hazard.

Disposition:

The memo was shown to the proponent and they indicated that there will be no processing carried out at the facility and the only water systems used will be in the washroom and lunch room.

Proponent had comments regarding the licence and these were considered. Where a change was made to the licence, the change was discussed with department staff.

PUBLIC HEARING:

A public hearing is not required.

RECOMMENDATION:

The Applicant should be issued a Licence, in accordance with the attached draft, to operate the Hazardous Waste Collection facility. Enforcement of the Licence should be assigned to the Central Region.

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