

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Mid Canada Millwork Ltd.  
**PROPOSAL NAME:** Mid Canada Millwork  
**CLASS OF DEVELOPMENT:** 1  
**TYPE OF DEVELOPMENT:** Manufacturing -  
**CLIENT FILE NO.:** 5595.00

### **OVERVIEW:**

Manitoba Conservation and Water Stewardship received a Proposal on April 4, 2014 for the continued operation of a millwork facility located at 78 PTH 52 West in Steinbach, Manitoba. The facility manufactures various products of wall and ceiling panels, reception desks, corian countertops and casework.

The Department, on May 8, 2014, placed copies of the Proposal in the Public Registries located at Legislative Library (200 Vaughan Street), the Winnipeg Millennium Public Library in Winnipeg and online at <http://www.gov.mb.ca/conservation/eal/registries/5595midcanada/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 Steinbach Carillon on May 8, 2014. The newspaper and TAC notifications invited responses until June 9, 2014.

### **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 –Compliance and Enforcement Branch**

*Environmental Compliance and Enforcement (Eastern Region) has reviewed the above proposal and submits the following comments.*

*1. National Pollutant Release Inventory Reporting Threshold Exceedance*

*Section 4.2 indicates that a National Pollutant Release Inventory (NPRI) calculation that was conducted by the proponent in 2009 revealed volatile organic compound and particulate emissions (both PM10 and PM2.5) that exceeded NPRI reporting thresholds. Section 5.0 identifies mitigation measures that are currently in place at the development.*

- a. Clarification is requested to verify whether the mitigation measures indicated in Section 5.0 were in place when the NPRI calculation was conducted in 2009, or implemented after 2009 to reduce emissions.*
- b. If the measures were in place when the NPRI calculation was conducted, does the proponent intend to introduce additional mitigative measures to reduce emissions?*
- c. If the measures were not in place when the NPRI calculation was conducted, has the proponent conducted additional monitoring to assess the effectiveness of mitigation measures put in place following the 2009 assessment?*

**2. Complaints Regarding Wood Burning Smoke**

*Compliance and Enforcement Branch has received a number of complaints from the neighboring area regarding smoke potentially released from the onsite wood burning boiler. Section 4.2 indicates that the onsite wood burning boiler is no longer in use. Environmental Compliance and Enforcement Branch requests confirmation that the boiler has been decommissioned and/or removed from the premises.*

**3. Sawdust and Particulate Control**

*During an inspection conducted by Environmental Compliance and Enforcement Branch in February 2013, a significant accumulation of sawdust was observed on the facility grounds. Onsite personnel indicated that the sawdust collectors had been emptied the day before. This is reportedly done once or twice per week. Are any control measures in place (or proposed) to minimize airborne sawdust that could create a nuisance to nearby residents?*

**Proponent Response (August 28, 2014)**

In regards to both the June 6 /14 & June 9 /14 Memorandums they both speak to and ask specific information on our wood burning furnace and our saw dust disposal along with the emissions PM10 and PM2.5 which both the furnace and saw dust contribute to. I trust the following response satisfies both Memorandums:

- Wood Burning Furnace - The wood burning furnace has been shut down and is no longer in use. This will / has reduced and mitigate previous emissions.
- Sawdust and Particulate Control – To reduce and mitigate airborne sawdust we have improved and implemented higher sides on our disposal truck and lengthened our dumping tarps so that when the saw dust is dumped from our collectors it remains in the disposal truck thus limiting airborne particles. As well the disposal truck is tarp while in transit. All sawdust is disposed properly into the designated areas at the local landfill site. This will / has reduced and mitigate previous emissions.

All other mitigation measures indicated in Section 5 of the report remain in use and in place.

I trust the above satisfies the information you require to complete our Proposal. Should you require any other information please contact me.

*Environmental Compliance and Enforcement Branch Comments (September 8, 2014)*

*Regarding sawdust and particulate control, I feel our concerns have been addressed.*

*Regarding the wood burning furnace, I understand that it is shut down and no longer in use, but I would like clarification as to whether or not the furnace has been permanently decommissioned and/or removed from the premises (could it be put back into use again in the future).*

*Regarding NPRI reporting threshold exceedances for particulate and VOCs, has the proponent conducted additional monitoring since 2009 and after the mitigation measure indicated in Section 5 of the report were put in place to assess the effectiveness of those measures?*

### Disposition

Claus 4 of the draft Environment Act Licence addresses a requirement to decommission the wood burning furnace. Clause 17 and 18 of the draft Environment Act Licence requires further sampling and analysis of potential air emissions.

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

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

- *The facility emits particulates (PM10 and PM2.5) and other air pollutants that are being regulated in other jurisdictions (ex. Ontario) such as toluene, xylene and isopropyl alcohol which are also listed in the Priority Substances List (PSL) under the Canadian Environmental Protection Act 1999 (CEPA 1999). The proposal provides total annual emissions for these air pollutants and particulates based on mass balance approach. However, there is no information provided regarding its emission rates and predicted ambient concentrations. As the proposal mentioned that the nearest residential area is just 115 meters away from the plant, it may be necessary to have these data to provide a meaningful assessment on the potential impacts to air quality. (Air dispersion modeling of the emissions may be necessary to estimate the potential ambient air concentrations in the facility's area of influence.)*
- *Was the wood burning furnace retired and decommissioned?*
- *There is limited information on saw dust disposal specifically on the land filling method. Will the disposal has a potential to generate dust or resuspension in air of the saw dust?*

Proponent Response (August 28, 2014)

In regards to both the June 6 /14 & June 9 /14 Memorandums they both speak to and ask specific information on our wood burning furnace and our saw dust disposal along with the emissions

PM10 and PM2.5 which both the furnace and saw dust contribute to. I trust the following response satisfies both Memorandums:

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All other mitigation measures indicated in Section 5 of the report remain in use and in place.

*Air Quality Section Comments (September 8, 2014)*

*Air Quality Section has the following comment on the response received from Mid Canada Millwork:*

- *Although the proponent has provided the estimated total annual emissions for particulates and VOC's, no information is provided about emission rates and predicted ambient concentrations of these pollutants. As the proposal mentioned that the nearest residential area is 115 meters away from the plant, it may be necessary to estimate the potential ambient air concentrations in the plant's potential area of influence.*

*Thanks for the opportunity to review.*

#### Disposition

Claus 4 of the draft Environment Act Licence addresses a requirement to decommission the wood burning furnace. Clause 17 and 18 of the draft Environment Act Licence addresses the requirement for further sampling and analysis of the potential air pollutants.

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

No Concerns

#### **Manitoba Conservation and Water Stewardship – Parks and Protected Spaces Branch**

*Parks and Protected Spaces Branch has reviewed the proposal submitted pursuant of the Environment Act the Request for review/comment - Mid Canada Millwork File: 5595.00. The Branch has no comments or concerns to offer as it does not affect any provincial parks, park reserves, ecological reserves, areas of special interest, or proposed protected areas.*

**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 Concerns.

**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**

No Response.

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

No Concerns

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

No Response.

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

No Concerns.

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

No Response.

**Manitoba Municipal Government – Community Planning Services Branch**

Steinbach Community and Regional Planning reviewed this application for any potential areas of concern to be addressed as part of the environmental evaluation pursuant to *The Environment Act*. The proposal is for the continued operation of a milling manufacturing facility located at 78 PTH 52 West in Steinbach.

The Mid Canada Millwork Facility is designated “*Industrial Policy Area*” in the City of Steinbach Official Community Plan. The current use meets the Official Community Plan. Light Manufacturing is considered a permitted use in the “*MI*” *Light Industrial Zone*.

Our office has no concerns with respect to the proposal given that operations are undertaken indoors. I trust that this submission will assist in the review of the proposed project. Please contact me at the above number if you have any questions or require further information. Thank you for the opportunity to comment.

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

No Response.

**Manitoba Municipal Government – Energy Division**

No Response.

**Manitoba Municipal Government – 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 Response.

**Manitoba Health – Environmental Health Unit**

No Response.

**Manitoba Labour – Office of Fire Commissioner**

No Response.

**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 facility is an existing millwork manufacturing facility located on a private land within the boundary of the City of Steinbach. 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 wall and ceiling panels, reception desks, corian countertops and casework manufacturing facility 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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Mines and Wastewater Section

September 30, 2014

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