October 7, 2019 Reference No. 11157020

Mr. Eshetu Beshada
Environmental Engineer
Municipal and Industrial Section
Environmental Approvals Branch
Manitoba Sustainable Development
1007 Century Street
Winnipeg, Manitoba
R3H OW4

Sent via Email: Eshetu.Beshada@gov.mb.ca

Dear Mr. Beshada:

Re: Response to Manitoba Sustainable Development Comments dated July 25, 2019
Application under the Manitoba Environment Act for a License to Operate a Combine Parts Manufacturing Facility at 432 Railway Street South in Altona, Manitoba (Site)

Thank you for your July 25, 2019 Email. The following is A & I Products Canada Inc. (A & I) response to the Manitoba Sustainable Development's request for additional information at the subject Site.

Manitoba Sustainable Development Comment No. 1

Please provide more information regarding the floor type in the manufacturing area and the type of spill kit available onsite.

A & I Response:

The floors are concrete floors in good condition. There are various universal spill kits available throughout the facility with different types of absorbents, pads & socks, as follows:

- Two 20-gallon spill kit bags
- One 95-gallon drum
- One chest with 50-gallon capacity
- Two universal portable 50-gallon bin
- Two battery-neutralizing kits
- There are also various pails and sorbents located throughout the facility for immediate minor spills.

Additional details about the spill kits available on Site and their location are presented in Table 1 and on Figure 1. The facility's emergency response plan and the material safety data sheets (MSDSs) are included in Appendix F and Appendix G, respectively, in the Development Environmental Assessment Report submitted to Manitoba Sustainable Development on April 9, 2019. Photographs of typical on-Site spill kits are presented in Attachment A.

Manitoba Sustainable Development Comment No. 2

Provide information how solid wastes generated on site are handled.

A & I Response:

Solid waste is removed for off-Site disposal considering the type of solid waste.

As described in Section 1.1 of the Development Environmental Assessment Report dated April 9, 2019, waste generated from the cutting and machining operations includes cut offs and material that is too short to be used and metal shavings, which are all collected into a scrap metal bin. Metal shavings with cutting fluid or rust preventive oil are also collected into the same bin, along with clean scrap metal. Non-hazardous wastes and recyclables including general refuse, wood, cardboard, paper, and scrap metal are picked up by licensed commercial haulers. The scrap metal consists of metal shavings/turnings that are collected in a bin and removed for off-Site disposal at a recycling facility by Gerdau Manitoba Recycling.

Additionally solid waste streams include:

- Aerosol Cans
- Empty containers and drums
- Oily rags
- Used oil filters
- Metal (including metal banding, chips, brass, copper, weld wire, metal scraps, composites)
- Comingled Recycling
- Wooden Pallets
- Quintex supplied rags
- Copper recycling

Information associated with the generation process, type, disposal procedure, transport company, accumulation area, and location for each of the above listed wastes is summarized in Table 2 and on Figure 1. Photographs of typical accumulation areas for solid waste streams are presented in Attachment A.

If the Manitoba Sustainable Development would like to discuss the above responses, or has questions, please let us know and we will set up a conference call for Manitoba Sustainable Development to communicate with the A & I Project Team.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD

Mauricio Barrera, MASc.

MB/kf/1

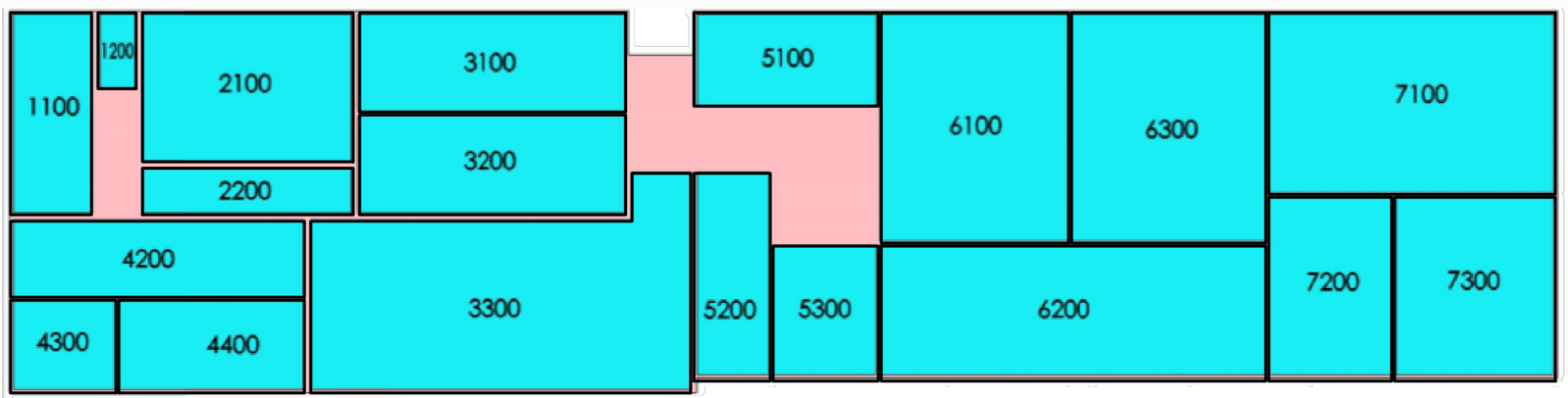
Encl.

cc: Gary Krahn, A& I
Tom Guoth, GHD

PRODUCTION BUILDING

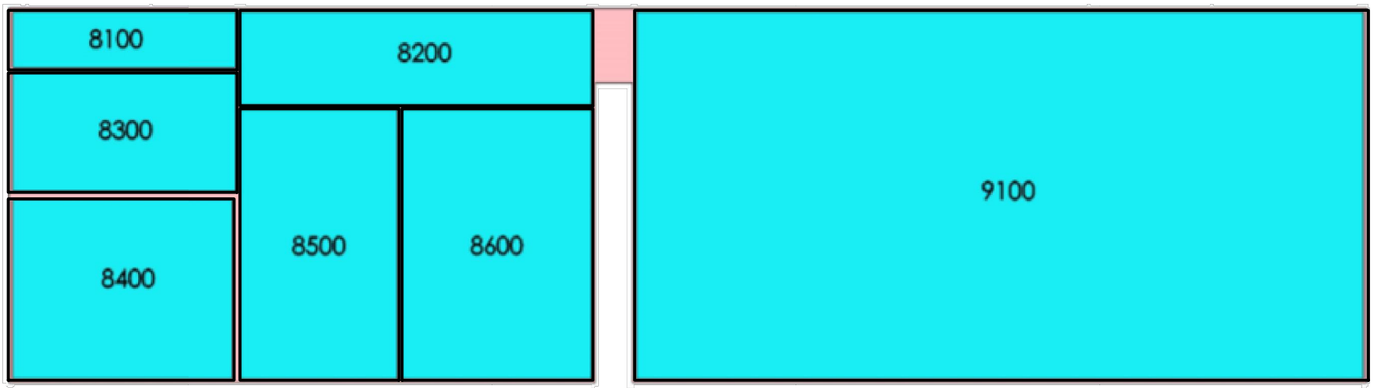
WEST SHOP

EAST SHOP



OFFICE AND SHIPPING BUILDING

MATERIAL STORAGE BUILDING



OPERATIONAL FLOOR PLAN AREAS	
DEPARTMENT	DEPT. ID. No.
Machining	1100
Tumbler / Kiln	1200
Maintenance	2100
Welding Area 2	2200
Induction Hardening	3100
Cylinder Bars / Drill / Punch	3200
Outdoor Storage / Production Shelter	3300
Dip Paint	4200
Beet Rims / Notching	4300
Slats / Recappers	4400
Productiom Offices	5100
Prod. Loading Dock	5200
Laser Parts Storage	5300
Welding Area 1	6100
Break & Shear	6200
Robot Area	6300
Chaffer Production	7100
Louver Prod. / Drilling	7200
Bar cutting / Saw	7300
Shipping Loading Dock	8100
Finished Goods Receiving	8200
Packaging / Kitting	8300
Administration Offices	8400
Packaging / Assembly	8500
Parts Storage	8600
Raw Material Storage	9100

Source: Supplemental Phase II ESA Site Plan

0 5 10 15m

JOHN DEERE CANADA ULC
432 RAILWAY STREET SOUTH, ALTONA, MANITOBA
DEVELOPMENT ENVIRONMENTAL ASSESSMENT REPORT

11157020-98
Mar 21, 2019

OPERATIONAL FLOOR PLAN

FIGURE 1

CAD File: P:\drawings\11157000s\11157020\11157020-reports\11157020-98(001)\11157020-98(001)GN\11157020-98(001)GN-WA004.DWG

Table 1

Spill Kit Details and Location
A & I Products Canada Inc.
Altona, Manitoba

Spill Kit Type	Absorption Capacity	Dept. ID. No./ Location
Mobile Spill Kit (Universal)	55 Gallon	9100
Mobile Spill Kit (Universal)	55 Gallon	7200
Universal Bag Spill Kit	5 Gallon	9100
Universal Bag Spill Kit	5 Gallon	5200
Battery Acid Spill Kit	1 Gallon	9100
Enpac Poly-Overpack Salvage Drum (aisle between machining, maintenance & paint area)	95 Gallon	1100
Metal Spill Kit Chest (Universal) (aisle between machining, maintenance & paint area)	55 Gallon	1100
6-7 Bags of Premium Absorbent (Quick Sorb - for refilling buckets throughout facility)	32 qt. each	2100
Buckets of Premium Absorbent available for use (Quick-Sorb)	Unknown	1100
Buckets of Premium Absorbent available for use (Quick-Sorb)	Unknown	3200
Buckets of Premium Absorbent available for use (Quick-Sorb)	Unknown	6200
Buckets of Premium Absorbent available for use (Quick-Sorb)	Unknown	7100
Buckets of Premium Absorbent available for use (Quick-Sorb)	Unknown	7300

Table 2

Waste Management Procedures
A & I Products Canada Inc.
Altona, Manitoba

Name of Waste	Process Generating Waste	Waste Type	Waste Disposal Procedure	Accumulation Area	Dept. ID. No./ Location	Transport Company
Aerosol Cans - All (empty or full/partially full)	Various processes throughout A&I Altona. (Spray paint and Lubricant). Pressurized aerosol cans containing different products are used in the facility where alternate chemical application processes are not available. It is important not to place aerosol cans in trash hoppers. Please follow the procedure so that aerosol cans, which can possibly contain hazardous waste, will be disposed in a safe manner.	Hazardous Waste	Dispose of aerosol cans in a "hazardous waste" aerosol can accumulation area. Caps placed on the aerosol cans or nozzle should be removed prior to disposal.	Production Shelter	3300	Clean Harbour
Empty Containers and Drums	Paint process	Non-Hazardous Waste	Containers or drums must be completely empty for disposal. These may then be placed under the storage tent and labeled with a date. Call Clean Harbour for pick up once accumulation warrants pick up.	Production Shelter	3300	Clean Harbour
Oily Rags (non-red coloured)	Various maintenance activities throughout the factory	Non-Hazardous Waste	Oily rags are placed into non-flammable drums and picked up by Clean Harbour for disposal.	Production Shelter	3200	Clean Harbour
Used Oil Filters	Maintenance Activities	Non-Hazardous Waste	Accumulate waste in designated drums. Drum must be labeled "Used Oil Filters" and maintained closed, away from drains and doorways. Contact Clean Harbour for collection of full drums.	Production Shelter	3200	Clean Harbour
Metal (including metal banding, chips, brass, copper, weld wire, metal scraps, composites)	Various processes in both production & assembly	Non-Hazardous Waste that is Recycled	Maintenance collects the metal recycling and once containers/bins are ful will call the vendor for pick up as required.	Metal scap bins are placed throughout the facility and the contents are placed in the scrap metal hopper	7100, 5300, 3200, 1100, 4400, 4300	Gerdau Recycling
Comingled Recycling	Various processes throughout facility	Recycled	Acceptable Items: Cardboard/chipboard, newspapers, phonebooks, magazines, office paper, empty aluminum cans, empty plastic bottles, plastics. Unacceptable Items: Styrofoam, food contaminated items, plastic bags, tissues, napkins, paper towels, food wrappers, glass.	Blue bins are located in the shipping warehouse, lunch rooms, and outside the production offices	5100, 8600	BSO Altona
Wooden Pallets	Shipping, Production & Assembly processes all require the use of wooden pallets.	Recycled	Wooden pallets and crates are to be stored in the appropriate wood bin/container and collected by Penner Waste for recycling/disposal. Bins are not overfilled. Workers are not permitted to remove wooden pallets from the site.	Outdoor wood bin	Outside of Dept 7200 & 7300	Penner Waste
Quintex Supplied Rags	Various processes in production	Recycled	Red rags are placed inside the red non-flammable bin in the PPE closet area of the welding department. Quintex picks up the rags for laundering as required.	Red non-flammable bin in PPE area of weld department	Between dept 6100 & 6300	Quintex
Copper recycling (contact tips, nozzles, spot welding tips, plasma cutter electrodes & nozzles)	Welding	Recycled	All copper products must be placed in the container located in the black welding consumables cabinet	Welding consumables cabinet	6100	Vendor that supplies welding supplies (urban mines)

Attachment A

Photo 1 – (08/28/2019) Typical 55-gallon mobile spill kit

Photo 2 – (08/28/2019) Typical universal bag spill kit

A & I Site Photographs

Photo 3 – (08/28/2019) Typical metal spill kit chest (universal)

Photo 4 – (08/28/2019) Typical accumulation area for general refuse

A & I Site Photographs

Photo 5 – (08/28/2019) Typical accumulation area for used oily rags

Photo 6 – (08/28/2019) Typical outdoor accumulation area for steel cuttings, wood, and general refuse

A & I Site Photographs

Photo 7 – (08/28/2019) Typical outdoor accumulation area for Bulk Chemicals, Empty Paint Drums & Drums of Oily Rags & Used Oil Filters.

Beshada, Eshetu (SD)

From: Beshada, Eshetu (SD)
Sent: July-25-19 12:16 PM
To: 'gkrahn@aiproducts.com'; 'mauricio.barrera@ghd.com'
Subject: File 5984.00 - A&I Products Canada Inc. - Altona Manufacturing Facility - Additional Info Request
Attachments: MI.pdf; OFC.pdf

Dear Mauricio,

As per my email below your EAP was advertised and circulated to Technical Advisory Committee for review. The following information are required to proceed with the environmental assessment.

1. Please provide more information regarding the floor type in the manufacturing are and the type of spill kit available onsite.
2. Provide information how solid wastes generated on site are handled.

I have also attached comments from the Manitoba Infrastructure and the Office of the Fire Commissioner for your information and comply to their requirement. You don't need to replay to these specific comments to me.

The Licensing process will commence once I receive the additional information provided for items 1 and 2 above.

Regards

Eshetu Beshada, PhD, PEng.
Environmental Engineer
Municipal and Industrial Section
Environmental Approvals Branch

Ph: (204) 945-7023

From: Beshada, Eshetu (SD)
Sent: June-05-19 8:14 AM
To: 'gkrahn@aiproducts.com' <gkrahn@aiproducts.com>
Cc: 'mauricio.barrera@ghd.com' <mauricio.barrera@ghd.com>
Subject: RE: File 5984.00 - A&I Products Canada Inc. - Altona Manufacturing Facility

Further to my email to you of October 17, 2018, the attached advertisement for your Proposal has been prepared to be posted on the Altona Red River Valley Echo.

Please contact me if you have any questions.

Regards,

Eshetu Beshada, PhD, P. Eng.
Environmental Engineer
Municipal and Industrial Section
Environmental Approvals Branch
Manitoba Sustainable Development
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