

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: PPG Phillips Industrial Coatings Inc.
PROPOSAL NAME: PPG Phillips Industrial Coatings Inc.
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Manufacturing and Industrial Plant
CLIENT FILE NO.: 5571.00

OVERVIEW:

On February 24, 2012 Manitoba Conservation and Water Stewardship received a Proposal dated February 21, 2012 for the continued operation of a paints and coatings manufacturing facility at 95 Paquin Road in the City of Winnipeg. The facility generates air emissions in the manufacturing processes.

The Department, on March 15, 2012, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Winnipeg Public Library, the Manitoba Eco-Network, and the Millennium Public Library. 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 Winnipeg Free Press on March 17, 2012. The newspaper and TAC notifications invited responses until April 16, 2012.

COMMENTS FROM THE PUBLIC:

There were no public comments.

Disposition:

No action required.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Canadian Environmental Assessment Agency

No concerns.

Disposition:

No action required.

Manitoba Conservation and Water Stewardship – Environmental Compliance and Enforcement

The following comments were provided:

- *Please confirm the number of bulk storage tanks on-site along with the size, type, and location of each tank.*
- *Are the tanks equipped with secondary containment and overfill protection?*
- *Page 7 of the ERP (Appendix D) identifies reportable quantities, this table should be updated to reflect the reportable spill quantities outlined in the Environmental Accident Reporting Regulation M.R. 439/87, as attached.*
<http://web2.gov.mb.ca/laws/regs/pdf/d012-439.87.pdf>

Proponent Response (Letter dated June 12, 2012)

- A site plan was included in Figure 5.1 of the application. We have provided an updated site plan (attached drawing by CH2MHILL) which should clarify the issues of property boundaries, utility location, storage tank locations (interior and exterior), raw material-finished goods-waste storage areas.
- Secondary containment and overfill protection are attached.

Disposition

After receiving additional information from the proponent, the concerns are satisfied and the Compliance and Enforcement Branch has no further concerns.

Manitoba Conservation and Water Stewardship – Programs and Strategies

The following is a summary of the comments provided:

- *A facility layout that includes, but is not limited to, the following should be provided:*
 - *Facility boundary, storm water catch basin valves, driveway, shipping and receiving area, warehouse area for storage (raw materials & finished goods), production area, storage area for waste (hazardous & non-hazardous).*
- *Additional storage details including location, mode of storage, storage capacity, methods used in accidental spill prevention, spill containment, grounding, fire safety.*
- *The proposal should identify the location of the offsite hazardous waste incineration facility and describe how PPG Phillips ensures that the waste materials are destructed to the satisfaction of PPG Phillips.*

Proponent Response (Letter dated June 12, 2012)

- PPG Phillips uses a combination of Clean Harbors and Miller Environmental to transport and dispose of hazardous waste generated by the paint manufacturing process. Both companies have transfer stations in Winnipeg. Each company then moves the waste to

their respective waste management facilities (Clean Harbors-Sarnia, Ontario; Miller – Letellier, Manitoba) for further processing.

- Waste solids (typically used filters and paint sludge) are landfilled. Dirty solvent and liquid waste paint are incinerated. Dirty solvent is occasionally recycled off-site (for re-use onsite), but that process is not currently in place due to quality concerns.

Disposition

After receiving additional information from the proponent, the concerns are satisfied and the Environmental Programs and Strategies Branch has no further concern.

Manitoba Conservation and Water Stewardship – Air Quality Section

The following comments were provided:

- *The submitted results of the air quality dispersion model indicated compliance when referenced to the current Ontario Point of Impingement Guidelines and Ambient Air Quality Criteria (February 2008).*
- *Xylene's predicted maximum ambient concentration is about 99.1% of the OMOE POI standard for 24-hour average. It is suggested that background levels (xylene) is considered in the assessment. If the xylene ambient concentration for the area is not available, the proponent may submit information on the typical xylene concentration in a similar or comparable area. Similarly, are there other sources of xylene emission in the study area? It is worthy to note that AERMOD is a refined model which use more detailed and precise input data and more specialized concentration estimate so it is expected to have less conservatism when compared with screening models.*
- *The attachments can't be opened maybe because of software requirements. An isopleth for xylene indicating the approximate location where the predicted maximum ambient concentration will be occurring will help in the review of the proposal.*

Disposition

The proponent completed air dispersion modeling and an analysis of the results to address concerns related to air emissions. Clause 12 of the draft Environment Act Licence addresses concerns related to VOCs emissions.

Manitoba Conservation and Water Stewardship – Parks and Natural Areas Branch

No concerns.

Disposition

No action needed.

Manitoba Conservation and Water Stewardship– Lands Branch

No concerns.

Disposition

No action needed.

Manitoba Conservation and Water Stewardship– Sustainable Resource and Policy Branch

No concerns.

Disposition

No action needed.

Manitoba Conservation and Water Stewardship – Water Stewardship Division

The following comments were provided:

- *The Water Stewardship Division submits the following comments:*
 - *The Water Stewardship Division does not object to the approval of this proposal, at this time.*
 - *The proponent needs to be informed of the following for information purposes:*
 - *Erosion and sediment control measures should be implemented until all of the sites have stabilized.*
 - *The Water Rights Act requires a person to obtain a valid licence to control water or construct, establish or maintain any “water control works.” “Water control works” are defined as any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert borehole or contrivance for carrying or conducting water, that temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, OR changes or may change the location or direction of flow of water, including but not limited to*

water in a water body, by any means, including drainage. If a proposal advocates any of the aforementioned activities, a person is required to submit an application for a Water Rights Licence to Construct Water Control Works. A person may contact the following Water Resource Officer to obtain an application and/or obtain information.

- *A contact person is Mr. Geoff Reimer C.E.T., Senior Water Resource Officer, Water Control Works and Drainage Licensing, Manitoba Conservation and Water Stewardship, Box 4558, Stonewall, Manitoba R0C 2Z0, telephone: (204) 467-4450, email: geoff.reimer@gov.mb.ca.*

Disposition:

The proponent is required to comply with all municipal, provincial, and federal acts and regulations.

Manitoba Conservation and Water Stewardship – Wildlife & Ecosystem Protection Branch

No concerns.

Disposition

No action needed.

Manitoba Infrastructure and Transportation – Highway Planning and Design Branch

No concerns

Disposition

No action needed.

PUBLIC HEARING:

A public hearing is not recommended.

CROWN-ABORIGINAL CONSULTATION:

It has been determined that Crown-Aboriginal consultation is not required as this proposal is to obtain a licence for an existing operation within an industrial park. The facility is not expected to affect the exercise of an aboriginal or treaty right.

RECOMMENDATION:

The Proponent should be issued a Licence for the continued operation of a paints and coatings 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:

Rafiqul Chowdhury, M.Eng., P.Eng.
Environmental Engineer
Mines and Wastewater Section
Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
September 27, 2012, Revised: October 25, 2012

Telephone: (204) 945-2614

Fax: (204) 945-5229

E-mail Address: rafiqul.chowdhury@gov.mb.ca