

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Structural Composite Technologies Ltd.  
**PROPOSAL NAME:** Structural Composite Technologies  
**CLASS OF DEVELOPMENT:** 1  
**TYPE OF DEVELOPMENT:** Manufacturing -  
**CLIENT FILE NO.:** 5594.00

### **OVERVIEW:**

Manitoba Conservation and Water Stewardship received a Proposal on April 7, 2014 for the continued operation of a fiberglass reinforced plastic products manufacturing facility at 100 Hoka Street in Winnipeg, Manitoba. The facility manufactures custom fabricated fiberglass reinforced plastic equipment for mining, milling, smelting, refining, processing and manufacturing companies.

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/5594structcomposites/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 Winnipeg Free Press on May 10, 2014. The newspaper and TAC notifications invited responses until June 9, 2014.

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

1. Elizabeth Evans  
June 8, 2014

*In response to the Notice of Environment Act Proposal appearing in the May 10th, 2014 Winnipeg Free Press, I wish to respond with my concerns regarding this proposal. I would ask that my street and email address not be made public in any form. My submission may be placed on the public files and may be made available to the affected parties.*

*I understand that SCT was previously located at 20 Burnett St. I also understand that while at that location there were numerous odour complaints made to Manitoba Conservation regarding noxious fumes coming from this area. I myself had driven through the stifling odours coming from this plant. Since SCT moved from that area, the air quality has substantially improved in that location.*

*The area where SCT is now located (100 Hoka Street) is in an area that has and continues to have issues with emissions from manufacturing facilities. New Flyer Bus manufacturing facility is located next to the SCT plant. We have had ongoing issues with emissions from New Flyer for more than a decade. I am attaching a Odour Log Sheet from Eric St.Pierre of New Flyer*

*Industries documenting the occurrences of odours in our neighbourhood. I am submitting this documentation to become part of the review of the Environmental Assessment Proposal. This email was first sent in March 2013 and lists odour events from 2010 to 2013. While New Flyer has made strides in reducing their emissions, there still are issues with air quality. The last thing this residential neighbourhood needs is another source of air pollution. You will notice in the Odour Log that there are occurrences of emissions from SCT. As this Odour Monitoring by New Flyer is ongoing, there is more recent data available from Eric St.Pierre of New Flyer Industries.*

*In 2005 the City of Winnipeg began a study of the area known as the Transcona Yards Industrial Neighbourhood Area Redevelopment Plan. I was a participant in that study. The outcome of the committee was that in recognition of the expanding residential development and the resulting conflicts between residents and businesses that future developments be of a compatible nature such as light industrial and commercial etc. This Area Redevelopment Plan was accepted and passed by City of Winnipeg Council in 2008. SCT is located within this area redevelopment plan.*

*I am very much concerned that in the Environment Proposal the surrounding area was classified as "Rural" for the dispersion factor. The area is definitely an "Urban" setting with a high density two story condo residential neighbourhood directly north of SCT. This residential area will be and currently is greatly impacted by the fumes being emitted from this facility. Has anyone from Conservation physically inspected the site to take note of the residential component directly to the north, northeast and northwest of the building? The drawings submitted are outdated and in the case of Figure No 2 of the Site Plan Dated October 2007 does not show any residential development whatsoever. The Aerial Photos of the site are Circa 1988 and earlier. How can decisions be made on inaccurate outdated information? I am appalled at this. Why was this accepted? Why was this classification not challenged?*

*I also take issue with the fact that the meteorological data used was from the Bismarck, North Dakota weather station. The predominant wind direction in Winnipeg is south especially in the summer months and this is when we have the greatest impact of emissions from this plant. Using Winnipeg meteorological data would provide true local wind speeds and direction. Why was the Bismarck data not rejected and the Winnipeg data requested?*

*In the report, the process description states that Acetone is used for cleaning purposes but I do not see it listed in the dispersion modeling. Acetone is 100% volatile and is a loss from the process. It should form part of the dispersion modeling and though it may occur over a very short time period, it should not be averaged over a longer time period. What is the composition of the Acetone being used and does it contain Benzene which is known to be hazardous to humans? The Province of Manitoba requires reporting of this chemical. Why was this not questioned?*

*The chemicals being used in the SCT facility are of a concern to the residents with Styrene and Duranap Cobalt 6 being listed as possible human carcinogens. Many of the other chemicals have chronic health hazard labels attached to them. I find the Dispersion Modeling to be insufficient; it appears to be done using the 24 hour criteria. I believe the industry standard is to use a ½ hour POI criteria and in the case of many odour causing chemicals, the modeling is*

*done on 10 minute and 2 minute time periods. Why was the ½ hour POI limit not modeled? I also find it troubling that the highest modeling results were excluded from the report to account for extreme, rare and transient meteorological conditions. Although dispersion modeling regulations allow for the exclusion of the 8 highest readings, many consultants include them to reflect true real world conditions. I think given the close proximity to residential housing, this would be an automatic inclusion.*

*The report states that emissions from the plant are vented through 4 exhaust stacks equipped with filters. It also states that the filter efficiency is estimated to be 20 to 30% of the emissions. That means that 70 to 80% of the emissions are landing in our yards and coming through our windows. No wonder the air is thick with fumes coming from this plant. The Styrene levels are closely monitored inside the plant but what about outside? The modeling does not provide the concentration isopleths for each of the chemicals to tell us how much we are being exposed to on a constant basis with a south wind.*

*While we residents appreciate the opportunity to comment on this Proposal, we find the technical information not to be user friendly. We residents must go to great lengths to have this information deciphered for our consumption.*

*Your Mission Statement states: **“The Environmental Approvals Branch will ensure that developments are regulated in a manner that protects the environment and public health, and sustains a high quality of life for present and future Manitobans”**. I hope these are not just words on a piece of paper. We residents are only asking that we be able to walk in our neighbourhood and enjoy our yards without fearing what we are being exposed to.*

*I would ask that your department request from SCT the additional information that I have addressed in this letter. Decisions cannot and should not be made on outdated and inaccurate information. The chemicals being used at SCT are of a nature that has been recognized as possible human carcinogens and chronic health hazards. We need actual ambient air testing and not modeling to truly assess these emissions.*

*It is my understanding that SCT was asked to submit an Environmental Assessment Proposal to Manitoba Conservation as a result of complaints received from area residents. As the area becomes more populated, the complaints will only intensify if proper remedial measures are not required prior to the license being issued. One would have thought SCT would have addressed these issues upon moving into a new location.*

*I have put considerable time and effort into this submission and I truly hope my observations and requests will be taken seriously.*

*Thank you for the opportunity to put forth my views.*

*Note: An odour source tracking log attached to this comment has been posted in the public registries*

2. Susan Zaikow  
May 27, 2014

*Please accept this letter and related attachment as my response to the Structural Composite Technologies Ltd. (SCT) proposal, notice of which was published May 10, 2014. My submission may be made available to the proponent and placed on the public registry, but I request that specific details (i.e. my name, address and email address) not be available to the public, either at a physical location or on the website (electronically).*

*In respect to the air dispersion modelling and pOint of impingement compliance assessment report prepared by Pinchin Environmental Ltd. :*

- The table for Worst-Case MSDS Material Blend for various contaminants states that the maximum emission is deemed insignificant or a number is stated. How does this reconcile with the fibreglass odour events log (see attachment 1) I have maintained since 2011? Are these events merely nuisance odours which the community is expected to endure or are there also related adverse health effects from this exposure?*
- The report notes that "the surrounding area is predominately rural; therefore the 'RURAL' dispersion factor was chosen". The setting is actually urban, with industry located to the east and west of SCT on the south side of Pandora Avenue, with substantial residential/business development on the north side Pandora Avenue, extending to the east and west as well. Why was this factor chosen?*
- Why was meteorological data used from the Bismarck, North Dakota weather station? Weather patterns in Bismarck, though not a long distance away, can vary significantly from those in Winnipeg and environs.*
- The report notes, on several occasions, that resulting emission rates were multiplied by 12/24 to convert to a 24h averaging period, since the plant only operates for 12 hours. Doesn't this conversion dilute the resulting average?*
- Emissions from resin spraying are vented through 1 of 4 general production exhausts, which are equipped with filters. Filter efficiency is estimated to be 20 - 30%. What happens to the rest of the 70 to 80%of emissions?*
- Styrene levels are monitored in the plant (section 5.2 - Monitoring and Reporting). What about the levels emitted to the outside?*
- The modelling includes anticipated emission levels for styrene, methanol, hydrogen peroxide, methyl ethyl ketone and particulate matter. How much of each is being released and what are the health risks associated with these emissions? What are the exposure limits to humans, especially in view of the fact that styrene is a possible human carcinogen?*
- It states that polyvinyl alcohol (PVA) is used as a mold release agent that causes odours, and acetone is used for testing and clean-up. Why were these not included in the dispersion model? Does the acetone used by SCT contain benzene, which is known to cause birth defects or other reproductive harm?*
- Sanding and cutting parts cause dust particles, which can become airborne. How this particulate filtered and what is the total quantity emitted to the outside air?*
- Table A3 - Emission Summary Table provides an overview of specific emissions from the plant, the details of which are too difficult for a non-technical person to understand.*

*Specifically, what are the levels of emissions and what are the adverse health effects of each of these contaminants?*

*It is my expectation that, if Manitoba Conservation grants an environmental Licence to Structural Composite Technologies Ltd., the following factors will be considered and/or included in the licence:*

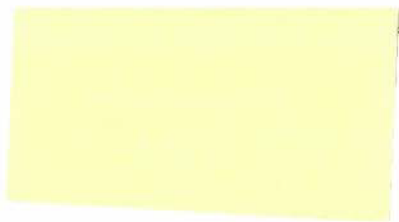
- ambient air testing (not merely modelling) be performed for particulate matter and odours in any air emission and the significance for potential acute and chronic impacts to health or environment from exposure to concentrations of the compounds detected;*
- specific limits be established for any and all air emissions and will include required sampling, analysis and reporting as required;*
- set out standards for air pollution control equipment regarding operating and maintenance measures, air pollution control devices and that any emissions do not create a significant health or environmental impact; and*
- implementation of any odour abatement modifications required within a specific period of time.*

*In conclusion, note that as an individual resident of this community, I am disadvantaged in my knowledge of the technical information presented in this proposal. However, I am familiar with the environmental impact that the operation of this facility has had to date (as noted in my fibreglass odour events log). I am hopeful that Manitoba Conservation will work with Structural Composite Technologies Ltd. to set out provisions in the licence to mitigate any health and environmental impact on our community. I also expect that the applicable regulations of the licence respecting dangerous goods, noise pollution, odour nuisance, particulate matter, particulate residue, pollutants, volatile organic compounds (VOCs), and wastewater are appropriate, that they will be implemented in a timely manner, that the licence is reviewed regularly, and that reporting requirements to Manitoba Conservation are included.*

*Thank you for the opportunity to provide my comments.*

*Note: A fibreglass odour events tracking log attached to this comment has been posted in the public registries.*

C. F. Green  
June 9, 2014



June 5th 2014

Ref. # file 5594.00

Dear Sirs,

While I am not against licensing this plant, I would ask that every effort is made to minimize emissions.

This area has been subject to VOC emissions from New Flyer Industries for many years.

It has taken much consultation and change of ownership and management to reach the relatively low levels that we now enjoy.

Yours Sincerely,

C.F. Green

## Proponent Response (September 5, 2014)

- 1) The area is defined as rural because a 3km radius is investigated and the predominant land type is chosen for modeling. The predominant land type in a 3km radius is rural even though the area immediately surrounding the site is urban. Using the rural dispersion factor results in more conservative dispersion and thus more conservative POI concentrations.
- 2) The meteorological data is from Bismarck because that is the closest weather station that provides surface data and upper air data. The Winnipeg weather station does not provide the data needed for the model. This methodology was suggested by Manitoba Conservation. The acceptable practice is to use both surface and upper air data from the same station.
- 3) Emissions of acetone are expected to be insignificant based on the amount of time the acetone containers are open and the fact that emissions are not directly exhausted. Acetone is only used in the cleaning of small rollers and brushes. The acetone is kept in closed containers at point of use and is collected and stored at the end of each shift. SCTL has recently implemented a more efficient acetone reclaim system as a means of reducing its consumption of acetone.
- 4) Cobalt was considered insignificant since it's expected to remain in the product (the overspray is not expected to decompose into individual components). Styrene emissions were compared to a 24-h standard because the health-based standard is 24-hours. The 24-hour standards are more stringent than the 0.5-hour standards and it is why they have been phased-in. It can be argued that removing the meteorological outliers is more consistent with "real world" results, since outliers only occur one day in a year. In addition, the report only removed outliers for PM, so this does not affect the styrene results (or any other chemical result). The styrene results (and other VOC results) are especially conservative because it was modeled in a "base case" - to generate a dispersion factor. These contaminants were not modeled individually.
- 5) One could conduct ambient air testing or source testing, but it is very expensive and is not a requirement of the regulations. The method used to calculate emissions and modeled is conservative and thus is actually giving a higher output than what you would find doing source testing. The model is known to be on the conservative side and the calculations also are conservative (i.e. assuming 100% of volatiles are emitted, 100% of styrene emitted is exhausted when in reality it is less than 100%)
- 6) Individual solid components and non-volatiles were deemed insignificant since they are not expected to come out of product. Since they are bound in the fiberglass they are not expected to be emitted.
- 7) Converting to a 24-hour average period does dilute the emission over the time period, but this is done because the limit is based on a 24-hour averaging period. If the limit was 0.5-hour or 12-hour, it would be higher. We are comparing to a lower limit, and thus averaging over the limit's time period.
- 8) There are actually two filters. One has an efficiency of 20% and one has an efficiency of 30%. The emissions that are not captured by the filter are assumed to be exhausted to atmosphere. The model applies filter MERV ratings that typically result in much more conservative findings.

- 9) The styrene levels outside are what is given in the Emission Summary Table. It is a conservative estimate (meaning actual levels are expected to be less).
- 10) How much of each is being released can be found in the Emission Summary Table (Appendix A-Table A3). It is up to the Provincial Ministry to set thresholds for potential health effects.
- 11) This can most likely be deemed insignificant based on low usage rate and low volatility (in fact, the MSDS for polyvinyl alcohol lists 0% volatile). The use of PVA is actively being reduced and replaced with honey wax as a de-molding agent.
- 12) The facility uses a shear cutting method (hand shears) which is not expected to produce fine particles. The grinding emissions are vented through a dust collector and then routed back into the facility (does not get outside). Visible particulate (anything over 44 microns) is not expected to exhaust outside as these larger particles fall to ground for cleanup and are not exhausted outside.
- 13) Attached are article from the;
  - Canadian Council of Ministers of the Environment
  - Environment Canada
  - Harvard Center for Risk Analysis

These are only a few articles that discuss the health risks of Styrene. A relevant and significant source of information can also be found with the Styrene Information and Research Center. SCTL is a proponent of safe practices not only for the benefit of its own employees but also to the surrounding public.

SCTL is one business of multiple businesses that exhaust process air out into the atmosphere. Attached are some examples of other businesses that may contribute to the odours in the Transcona area. Examples include other nearby fiberglass shops, businesses that use paint, welding or metals manufacture are all within the vicinity of the area for the Odour Event Logs.

***Note: Attachments to address health impact and a response to the odour logs are posted at public registries.***

#### Disposition

The proponent addressed the concerns raised by the public. In addition, Clauses 9, 11 and 12 of the draft Environment Act Licence address issues related to particulate emission, odour and Volatile Organic Compounds. Clauses 6 and 7 require the establishment of a Community Liaison Committee (CLC) while Clause 18 requires a complaint handling plan to address any ongoing public concerns.

### **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 (Central Region) has reviewed the above noted Environment Act Proposal (EAP). Please find the following comments regarding the proposal.*

*Regarding Odour Emissions and Control:*

*This facility operates in close proximity to a residential neighbourhood. We request further information regarding how the proponent proposes to reduce the odour emissions in the neighbouring community.*

### **Proponent Response (September 5, 2014)**

Some sources of odour such as PVA and acetone have already been targeted for reduction. A more efficient acetone reclaim system has been purchased that allows for reducing acetone consumption. Replacing PVA with honey wax as a de-molding agent has been adapted to reduce the use of PVA.

Controlled spraying and continued operator training has been a focus to manage and reduce the amount of overspray in shop spray applications. Less overspray results in less media being exhausted from the facility.

Filter changeovers continue to be managed to ensure filter and exhaust system is functioning as designed for trapping particulate matter.

The odour is being addressed with our resin manufacturers to review options for reduction without adversely affecting the product performance.

### **Environmental Compliance and Enforcement (September 16, 2014)**

*Environmental Compliance and Enforcement (Central Region) has reviewed the above noted Environment Act Proposal (EAP). Please find the following comments regarding the proposal.*

*Regarding Odour Emissions and Control:*

- *Please provide more information and detail regarding the reduction of the targeted odour sources. How much of a reduction is expected? How much of this has been implemented already?*
- *Please provide more details on how the spraying is controlled.*
- *Further options to reduce odours within the process may require future Notices of Alteration of the licence.*

## Proponent Response (March 27, 2015)

Our response is:

- The resins applied to our products are at times specified by our clients for their specific application. This specification includes resin manufacturers (especially on our corrosion products). This is quite common in the fiberglass industry. We have partnered with some of our resin manufacturers to look for a “greener” resin for some of our commodity products. There is opportunity to test and incorporate “low odour” resins. The acceptance of these resins must go through third party approval by way of CSA or NSF to ensure product integrity is not compromised. Using alternative products will be an ongoing process to develop and improve. As an example we have already incorporated a low styrene gelcoat for our bathware product line.
- We have been ensuring that the overspray of product is minimized. There is both an environmental and financial benefit to ensure we minimize overspray and ensure all resin is sprayed onto the part and not wasted in surrounding areas. The methods employed include, continued training for gun operators. An example of the training can be found at the following link:

<http://www.ccpcompositesus.com/index.php/ccp-university/schedule> (specifically Gelcoat Application and Spray Pattern). We have had CCP on site to provide operator training.

- We have targeted additional capital investment to update/replace our guns and resin delivery systems with newer more efficient models. Again, this is to ensure we maximize efficiency of spraying to minimize wasted overspray that will ultimately produce additional emissions.
- We have invested and promoted more use of closed and specially sealed containers usage in the shop. This again has both environmental and financial benefits as there is less evaporation of media and therefore less waste and odour is emitted.
- We have reduced our amount of resins on our premises. The shop floor scheduling has been made more efficient by scheduling workflow and just in time delivery of resins to only build and use what is required each day. Again, this effort limits the amount of resin use at any given time in the shop.

The above comments all contribute to using less resin to meet our needs. The comments from the ECEB are noted and understood. We at this time do not have the data to quantify the improvements. It is planned to have data collected by way of resin consumption monitoring. The capital investments will need to be monitored for the value of return. This return is measured by way of reduction in resin usage which directly impacts emission amounts.

## **Environmental Compliance and Enforcement (September 16, 2014)**

Environmental Compliance and Enforcement (Central Region) has reviewed the above noted Environment Act Proposal (EAP). Please find the following comments regarding the proposal.

### 1) Regarding Odour Emissions and Control:

- Ongoing odour emission reductions, such as the reduction in VOCs, should be implemented as part of any Environment Act Licence issued

### Disposition

Clause 11 of the draft Environment Act Licence address odour nuisances while Clause 12 authorizes the Director to request remediative measures to reduce the impingement of VOC emissions outside the Development.

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

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

- *There was no mention of size fraction of particulate matter used in the modeling work. There are three size fractions of particulate matter (PM<sub>2.5</sub>, PM<sub>10</sub>, and SPM) listed in the Manitoba Ambient Air Quality Criteria (MAAQC).*
- *Modeling results submitted is in tabular format and no contour plot is provided. It is suggested that contour plots be included as it is an effective assessment tool regarding emission dispersion in the plant's area of influence.*
- *Multi-Chemical Utility of AERMOD model may give more authentic concentration of each pollutant rather than using base emission rate of 1 g/s. Multi-Chemical Utility allow to specify multiple pollutant emissions from different sources with varied emission rates.*
- *There was no mention in the submitted proposal on the year of meteorological data used in the modeling work.*

### Proponent Response (September 5, 2014)

- With lack of better information, it was assumed that all PM is PM<sub>2.5</sub> (and used the lowest limit for comparison)
- Modelling files can be sent to Manitoba Conservation for the creation of their contour plots.
- A base model for all contaminants (other than PM) for ease of modeling. This method results in more conservative concentrations (therefore, we are even more below limits). Thus, this method is generally acceptable. ;
- 1992 to 1996 (the most recent years available) data was used.

### Air Quality Section Comment (September 15, 2014)

*Air Quality Section has the following comments on the response received from SCT:*

- *If it is assumed that all PM is PM<sub>2.5</sub>, then the model result should compare with PM<sub>2.5</sub> standard value. According to Manitoba Ambient Air Quality Criteria (MAAQC), 24-hour average PM<sub>2.5</sub> standard is 30 µg/m<sup>3</sup>. Model result of 24-hour average PM<sub>2.5</sub> listed in Table*

A3 (Appendix A) is 52.5 µg/m<sup>3</sup> and in Table E3-1 (Appendix E) is 60.1 µg/m<sup>3</sup> which means predicted PM<sub>2.5</sub> concentrations are not within the air quality guideline.

- Contour plots are not created separately. These plots should automatically come out as model output and can be used as an effective assessment tool for pollutant's dispersion.

Thanks for the opportunity to review.

### **Proponent Response (March 10, 2015)**

To address the most recent questions for the air quality section I have attached the following:

- Most recent list of questions from Manitoba Conservation (Air Quality on Response.pdf);
- Updated Emission Summary table showing updated emission results, including for PM<sub>2.5</sub>, updated datasheets, and Emissions Modelling Result table. From the attachment it can be seen that PM<sub>2.5</sub> has been updated, and is below its respective Canada Wide Standard. As a very conservative approach had been used to estimate particulate emissions, the estimates have been revised to use a methodology developed by the Composite Fabricators Association (CFA) (81397 - Structural Composite Technologies ECA Summary Tables.pdf);
- CFA Particulate Matter estimation technique, which includes a report (CFA PM Emissions Report.pdf) and spreadsheet developed by CFA (open molding – clean.xls);
- One generic contour plot for reference (SCT Contour.JPG), and
- All contour plots for the facility's generic base model (Base.AD.zip).

As discussed with Muntaseer, our approach had been to use a conservative “Base” model to develop a dispersion factor for all contaminants (as detailed in the original report). As such the contour plots are for this generic model where each source was modelled with a 1 g/s emission rate. In our discussions, Muntaseer confirmed that he was okay with this approach.

**Note:** *The additional information included as an attachments are posted at the public registries.*

#### Disposition

Air Quality Section reviewed the response and has no further concerns. In addition, Clauses 18 to 25 of the draft Environment Act address issues related to air emission monitoring while Clauses 26 and 27 address ambient air quality monitoring requirement.

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

No Comments

#### **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 - File 5594.00 - Structural Composite*

*Technologies EAP. 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 Comments.

**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**

No Response.

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

No Response.

**Manitoba Municipal Government – Energy Division**

No Response.

**Manitoba Municipal Government – Petroleum Branch**

No Concerns.

**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 paint manufacturing facility located on a private land within the boundary of the City of Winnipeg. 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 fiberglass reinforced plastic products manufacturing facility at 100 Hoka Street in Winnipeg 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

April 16, 2015

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