

Date: July 30, 2015

File: 5757.00

To: Tania Steele
Licensing Clerk
Environmental Approvals Branch
123 Main Street
Ste. 160 Union Station
Winnipeg, Mb R3C 1A5

From: Rob Boswick, P. Eng.
Environmental Engineer
Environmental Approvals Branch
123 Main Street
Ste. 160 Union Station
Winnipeg, Mb R3C 1A5

Subject: **Granny's Poultry Cooperative Ltd. – Lagoon Sludge Land Application – EAP Material to Public Registries**

Please distribute the attached material pertaining to the Granny's Poultry Cooperative Ltd. lagoon sludge land application Environment Act Proposal review to the appropriate Public Registries.

Attached are:

1. Letter (2 pages) with attachments from Environmental Approvals Branch – Manitoba Conservation and Water Stewardship to MMM Group Limited, dated June 5, 2015;
2. Email message (2 pages) from Water Science and Management Branch – Manitoba Conservation and Water Stewardship, dated April 23, 2015
3. Email message (1 page) from Environmental Approvals Branch – Manitoba Conservation and Water Stewardship, dated April 22, 2015;
4. Letter (1 page) from Highway Planning and Design Branch – Manitoba Infrastructure and Transportation, dated April 14, 2015;
5. Memorandum (1 page) from Environmental Compliance and Enforcement Branch – Manitoba Conservation and Water Stewardship, dated April 16, 2015; and
6. Email message (1 page) from Water Control Works and Drainage Licensing Section – Manitoba Conservation and Water Stewardship, dated March 25, 2015.
7. Email message (1 page) from Community and Regional Planning – Manitoba Municipal Government, dated April 17, 2015;
8. Memorandum (1 page) from Air Quality-Environmental Programs & Strategies – Manitoba Conservation and Water Stewardship, dated April 16, 2015;
9. Email message (1 page) from Wildlife Branch – Manitoba Conservation and Water Stewardship, dated April 16, 2015;
10. Email message (1 page) from Lands Branch – Manitoba Conservation and Water Stewardship, dated April 15, 2015;
11. Email message (1 page) from Office of Drinking Water – Manitoba Conservation and Water Stewardship, dated April 13, 2015;

12. Email message (1 page) from Office of the Fire Commissioner, dated April 13, 2015;
13. Email message (1 page) from Water Use Licensing Section – Manitoba Conservation and Water Stewardship, dated March 30, 2015; and
14. Email message (1 page) from Parks and Protected Spaces Branch – Manitoba Conservation and Water Stewardship, dated March 27, 2015.

There are a total of 16 pages attached to this memo.

Thank you,



Rob Boswick
Attachments



Conservation and Water Stewardship
Environmental Stewardship Division
Environmental Approvals Branch
123 Main Street, Suite 160, Winnipeg, Manitoba R3C 1A5
T 204 945-8321 F 204 945-5229
www.gov.mb.ca/conservation/eal

File: 5757.00

June 5, 2015

Darren Keam, M.Sc., P.Ag.
MMM Group Limited
111 – 93 Lombard Avenue
Winnipeg, MB R3B 3B1

Email: keamd@mmm.ca

Dear Mr. Keam:

Re: Granny's Poultry Cooperative Ltd. – Land Application of Lagoon Sludge – Environment Act Proposal

The initial review of the Environment Act Proposal (EAP) for the Granny's Poultry Cooperative Ltd. land application of lagoon sludge has been completed.

The initial review has generated comments and requests for additional information. Please respond to the comments and requests from the Technical Advisory Committee presented in the attached items being:

1. Email message from Water Science and Management Branch – Manitoba Conservation and Water Stewardship, dated April 23, 2015
2. Email message from Environmental Approvals Branch – Manitoba Conservation and Water Stewardship, dated April 22, 2015;
3. Letter from Highway Planning and Design Branch – Manitoba Infrastructure and Transportation, dated April 14, 2015;
4. Memorandum from Environmental Compliance and Enforcement Branch – Manitoba Conservation and Water Stewardship, dated April 11, 2015; and
5. Email message (w/ attachment) from Water Control Works and Drainage Licensing Section – Manitoba Conservation and Water Stewardship, dated March 25, 2015.

Please address and respond to the comments and requests for additional information. Resulting responses that are specifically pertinent to the EAP review are to be directed through Manitoba Conservation and Water Stewardship's Environmental Approvals Branch. The EAP review process will continue upon receipt of your responses.

If you have any questions or would like to discuss these items, please contact me at 204 6030.

Yours truly,

Original Signed By

Robert Boswick, P. Eng.
Environmental Engineer

Attachments

c: Richard Anderson, Granny's Poultry Cooperative Ltd.
Don Labossiere, Director – Environmental Compliance and Enforcement, Manitoba
Conservation and Water Stewardship
Public Registries

Boswick, Robert (CWS)

Subject: FW: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

From: Wiebe, Brian (CWS)
Sent: April-23-15 3:40 PM
To: Boswick, Robert (CWS)
Cc: Smith, Diane (CWS)
Subject: RE: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

Hi Rob,

Here are my comments on EAP 5757.00

1. Calculation issues:
 - a. The "dry tonnes available" calculated field in Tables 5.5, 5.6 and 5.7 has failed to take into account the density of the material sampled so the value for cell one needs to be multiplied by 1.18 and the value for cell two by 1.13.
 - b. The blended nutrient value in Table 5.7 appears to be a simple average for most parameters. However cell two contains roughly 3 times the material as that in cell one and hence a weighted average calculation is needed to more accurately represent the nutrient content of the blended material.
 - c. Since cell 2 has a much higher nitrogen concentration, these two errors will result in a much higher land requirement for an N based application rate and a moderately higher land base requirement for P based application rates. The land requirement will need to be recalculated and new spread agreements arranged if necessary.
2. Dewatering of the biosolids is mentioned but no details are given. The water will be nutrient rich so both the method of dewatering and the management of the water must be detailed in the proposal before it can be properly reviewed.
3. The blending process has not been described in the proposal.
 - a. The material has a very high water content and there is a potential for environmental impact during blending due to runoff or leaching of nutrient rich water. This process will need to be detailed and include any mitigation measures planned to prevent environmental impacts.
 - b. Uniform blending is also critical for accurate application of nutrients. Detailed description of the blending process is needed to properly evaluate the proposed method of applying a blended product.
4. Follow-up soil sampling (Olsen-P 0-15 cm, and nitrate-N 0-60 cm), one and two years post application is necessary to demonstrate compliance with the Nutrient Management Regulation.
5. Tables 5.5, 5.6 and 5.7 all reference a 2015 soybean crop as the planned crop upon which nutrient application rates are based. With a fall 2015 application as is proposed, the 2016 crop should be used. The proponent needs to clarify if soybeans are planned on the spread field for 2016 or if another crop is planned, application rates will need to be revisited. Therefore either the year or the crop (and assorted rates) needs to be corrected in the table.

Brian

Brian Wiebe, Ph.D., P.Ag.
Nutrient Management Program Coordinator

Water Science and Management Branch
Manitoba Conservation and Water Stewardship
160-123 Main Street (Box 20)
Winnipeg, MB R3C 1A5

Tel: 204-945-0585 or 1-800-282-8069 ext. 0585

Fax: 204-948-2357

Email: brian.wiebe2@gov.mb.ca

Website: <http://www.gov.mb.ca/waterstewardship>

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Boswick, Robert (CWS)

Subject: FW: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

From: Smith, Diane (CWS)
Sent: April-22-15 9:46 AM
To: Boswick, Robert (CWS)
Cc: Streich, Laurie (CWS); Webb, Jen (CWS); Wiebe, Brian (CWS)
Subject: Fw: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

Hello Rob,

Please see my comments below.

1. The nutrient content and application rate of the blended contents of Cell 1 and Cell 2 (Table 5.7) should be recalculated using a weighted average. Cell 2 contains a greater quantity of material than Cell 1 and using a weighted average will provide a more appropriate approximation of nutrients and a more appropriate application rate.
2. Provide further information on the drying bed location.
3. Provide detailed information on the dewatering process and how any liquid from the dewatering process will be managed.
4. Provide further information on how the material from each cell will be thoroughly mixed to ensure a well blended product prior to application.
5. It is recommended Olsen phosphorus be included in the soil analysis for the 15-60 cm soil sample prior to application.
6. It is recommended soil samples from the lands receiving biosolids be taken 1 year post application and submitted to Manitoba Conservation and Water Stewardship to ensure unacceptable nutrient loading or other environmental impact has not occurred as a result of biosolid application.
7. The spread field is within the Red River Valley Special Management Area and the application of biosolids must comply with the restriction on fall spreading as outlined in the Section 14.2(1) of the Livestock Manure and Mortalities Management Regulation (M.R. 42/98).

Diane Smith, Soils Specialist - Conservation & Water Stewardship



Infrastructure and Transportation

Highway Planning and Design Branch
Environmental Services Section
1420 - 215 Garry St, Winnipeg, MB R3C 3P3
T (204) 619-4359 F (204) 945-0593

April 14, 2015

Tracey Braun, M. Sc.
Director, Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
123 Main St., Suite 180
Winnipeg, MB R3C 1A5

RE: Granny's Poultry Cooperative Ltd. - Land Application of Lagoon Sludge
Client File No. 5757.00

Dear Ms. Braun:

MIT has reviewed the proposal under the *Environment Act* noted above and we do not have any concern provided that the sludge will be hauled to the fields using trucks.

However, if pumps and hoses will be used within any Provincial Trunk Highway's or Provincial Road's right-of-way, a permit will be required from MIT.

Permit applications may be obtained by contacting Mr. JC Boily at (204) 346-6288 or by email at Jean-Camille.Boily@gov.mb.ca.

Thank you very much for providing us the opportunity to review the proposal.

Sincerely,

Ryan Coulter, M. Sc., P. Eng.
Manager of Environmental Services

DATE: April 16, 2015

TO: Robert Boswick
Environmental Approvals
Conservation and Water Stewardship
123 Main St Suite 160 (Box 80)
Winnipeg MB R3C 1A5

FROM: Environmental Compliance and
Enforcement
Conservation and Water Stewardship
Unit B 284 Reimer Avenue
Steinbach, Manitoba R5G 0R5

**SUBJECT: Granny's Poultry Land Application of Lagoon Sludge Environment Act Proposal
File: 5757.00**

Environmental Compliance and Enforcement has reviewed Environment Act Proposal File No. 5757.00 regarding Granny's Poultry Land Application of Lagoon Sludge. Please find the following comments following comments.

1. In *Section 8.1 Final Objectives for the Site* it states that a portion of the current lagoon area would be redeveloped into a new emergency cell. Compliance and Enforcement Branch would like clarification as to the intended use of the "emergency cell".

Boswick, Robert (CWS)

From: Roberts, Dan (CWS)
Sent: March-25-15 1:14 PM
To: Boswick, Robert (CWS)
Subject: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

Any water control works (drains, culverts, dykes, dams, etc.) associated with this project will require licensing under the *Water Rights Act* – an application is attached for the proponent's convenience. Any inquiries in this regard may be directed to the local *Water Resource Officer*. Their contact information may be found at:

http://www.gov.mb.ca/conservation/waterstewardship/licensing/pdf/areas_of_focus_jan_23_12.pdf

Sincerely,

Dan Roberts
Water Resource Officer
Water Control Works and Drainage Licensing Section
Conservation and Water Stewardship
Box 6000, Building #1180, 75 - 7th Avenue,
Gimli, MB R0C 1B0
Cell: (204) 641-1331

Boswick, Robert (CWS)

Subject: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

From: Vivekananda, Prashanna (MMG)

Sent: April-17-15 10:19 AM

To: Boswick, Robert (CWS)

Subject: RE: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

Community and Regional Planning has no concerns.

Prashanna Vivekananda

Community Planner - Beausejour and Steinbach Regional Offices

Community and Regional Planning

Manitoba Municipal Government

Beausejour:

Ph: (204) 268-6065

Fx: (204) 268-6007

Steinbach:

Ph: (204) 346-6245

Fx: (204) 346-7305

Email: prashanna.vivekananda@gov.mb.ca

From: Singbeil, Kaitlynn (MMG) **On Behalf Of** +STE1000 - Steinbach CRP (MMG)

Sent: March-19-15 3:30 PM

To: Vivekananda, Prashanna (MMG); Walker, Stephen (MMG)

Subject: FW: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

Kaitlynn Singbeil

Administrative Assistant

Community and Regional Planning Services

240-323 Main Street

Steinbach, MB R5G 1Z2

T: 204-346-6240

F: 204-346-7305

DATE: 16 April, 2015

TO: Robert Boswick
Environmental Approvals
Conservation and Water
Stewardship
160-123 Main Street, Winnipeg

FROM: Muntaseer Ibn Azkar
Air Quality-Environmental Programs
& Strategies
Conservation and Water Stewardship
1007 Century Street, Winnipeg

**SUBJECT: Granny's Poultry Cooperative Ltd. – Land Application of Lagoon Sludge
(File 5757.00)**

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

- The proposal is not expected to have any significant impact on air quality.
- The odour clause is suggested to be included in the License.

Boswick, Robert (CWS)

Subject: FW: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

From: Kiss, Brian (CWS)

Sent: April-16-15 1:44 PM

To: Boswick, Robert (CWS)

Subject: RE: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

No wildlife related concerns.

-Brian Kiss

Boswick, Robert (CWS)

Subject: FW: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

From: +WPG1212 - Conservation_Circulars (CWS)
Sent: April-15-15 10:02 AM
To: Boswick, Robert (CWS)
Subject: FW: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

Hello Robert,

Good morning

Lands branch – Manitoba Conservation and Water Stewardship has no comment on the above noted EAP as the parcel is privately owned.

Thank you for the opportunity to review.

Kind regards

Winifred Frias
Crown Land Programs Administrator
Lands Branch
Manitoba Conservation and Water Stewardship
200 Saulteaux Crescent, Box 25
Winnipeg, Manitoba R3J 3W3 CANADA
Phone: (204) 945-4524
Facsimile: (204) 948-2197

Boswick, Robert (CWS)

From: Stibbard, James (CWS)
Sent: April-13-15 10:48 AM
To: Boswick, Robert (CWS)
Subject: Re: 5757.00 Granny's Poultry biosolida Application EAP

Robert,

I reviewed the above noted EAP and found no concerns respecting drinking water safety or quality. There are no users of surface water for drinking in the area and the EAP noted that measures will be taken to protect groundwater resources.

If you have any questions, please call.

Regards,

James Stibbard P. Eng.
Approvals Engineer
Office of Drinking Water
1007 Century Street
Winnipeg MB R3H 0W4
phone: (204) 945-5949
fax: (204) 945-1365
email: James.Stibbard@gov.mb.ca
website: www.manitoba.ca/drinkingwater

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Boswick, Robert (CWS)

Subject: FW: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

From: Kubish, Cheryl (OFC)

Sent: April-13-15 11:02 AM

To: Boswick, Robert (CWS)

Subject: RE: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

The Office of the Fire Commissioner has no further concerns or comments.

Cheryl Kubish
Administrative Assistant
Office of the Fire Commissioner
508-401 York Avenue
Winnipeg MB R3C 0P8
Phone: 945-3328
Fax: 948-2089

E-Mail address: Cheryl.Kubish@gov.mb.ca

Boswick, Robert (CWS)

Subject: FW: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

From: Matthews, Rob (CWS)

Sent: March-30-15 5:05 PM

To: Boswick, Robert (CWS)

Cc: Wiseman, Kylene (CWS)

Subject: RE: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

No concerns from us.

Rob Matthews, Manager, WULS, CWS

Boswick, Robert (CWS)

Subject: FW: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

From: Kelly, Jason (CWS)

Sent: March-27-15 2:51 PM

To: Boswick, Robert (CWS)

Subject: RE: EAP Request for comments - Granny's Poultry Lagoon File: 5757.00

Parks and Protected Spaces Branch has reviewed the proposal submitted pursuant to the *Environment Act* for Bowes Polar-King Lagoon File: 2738.10. 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.