Russell Redi-Mix Concrete
Langenburg Redi-Mix Ltd.
A DIVISION OF COCO GROUP

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204-773-2586 Fax 204-773-2571

February 11, 2016

Director
Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
Suite 160, 123 Main Street
Winnipeg, Manitoba
R3C 1A5

Dear Tracy Braun,

Enclosed please find an Environmental Act Proposal (EAP) for the licensing of Russell Redi-Mix Concrete's third asphalt plant. I have also enclosed the necessary application fee for a Class 1 Development for the licensing of an asphalt plant in the Province of Manitoba.

Russell Redi-Mix Concrete (RRMC) has numerous asphalt projects currently scheduled for the 2016 construction season and in turn is proceeding with the proper approvals needed for the operation of an asphalt plant. Currently RRMC has two asphalt plant operating in Manitoba but in case of an unforeseen mechanical breakdown or weather delay RRMC would like the reassurance of a third plant to make sure the deadlines put forth by Manitoba Infrastructure and Transportation (MIT) are met.

This third plant will not only create more jobs for Manitobans but also supply the province of Manitoba with the asphalt it needs. RRMC has already been awarded over 353,000 tonnes of bituminous pavement through MIT for the 2016 construction year and has hired a compliment of highly skilled asphalt paving staff.

RRMC looks forward to working with Manitoba Conservation and Water Stewardship and all aspects of government to become an industry leader in the production of asphalt pavement.

Sincerely,

Rock-Anthony Coco, B.A.Sc, Executive Manager

Environment Act Proposal Form

Manitoba
Conservation and Water Stewardship

Name of the development: Russell Redi-Mix Concrete Astec Six Pack		
Type of development per Classes of Development Regulation (Manitoba Regulation 164/88): Class 1 Development		
Legal name of the applicant: Coco Paving (Canada) Inc. o/a Russell Redi-Mix Concrete		
Mailing address of the applicant: Box 545		
Contact Person: Anthony Coco		
City: Russell	Province: Manitoba	Postal Code:
Phone Number: 204-773-2586	Fax: 204-773-2571	email: acoco@cocogroup.c
Location of the development: Through the Province of Manitoba		
Contact Person: Anthony Coco		
Street Address:		
Legal Description:		
City/Town:	Province: Manitoba	Postal Code:
Phone Number:	Fax:	email:
Name of proponent contact person for purposes of the environmental assessment: Anthony Coco		
Phone: 204-773-2586 Fax: 204-773-2571	Mailing address: Box 545 Russell, MB R0J 1W0	
Email address: acoco@cocogroup.com		
Webpage address: russellredimixconcrete.com		
Date: February 11, 2016	Signature of proponent, or corporate principal of corporate proponent: Printed name: ANTHONY COCO	

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Russell Redi-Mix Concrete Portable Asphalt Plant Proposal

Manitoba

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Executive Summary

Russell Redi-Mix Concrete (RRMC) has been a name stay in western Manitoba for decades, with its small town humbleness and life size ambitions, has grown to become one of the largest rural contractors in the province of Manitoba. While focusing primarily on aggregate production RRMC has grown over the years to own a fleet of 5 mobile crushing spreads. Not only does RRMC produce aggreagate but also owns two redi-mix plants (one in Russell, Manitoba and the other in Roblin, Manitoba) and has been a general contractor for Manitoba Infrastructure and Transportation (MIT) in excess of 25 years. On behalf of MIT, RRMC has provided granular production, base laying and large scale excavations. Before last year RRMC subcontracted all of their asphalt paving requirements. With the growing MIT budgets and the resulting increase in asphalt volumes, RRMC saw an oppurtunity to enter into the asphalt paving market as well. Therefore, RRMC has puchased a brand new Gencor 400 TPH Portable Asphalt Plant which received an Environmental Act Liscense and is currently in full operation. Due to MIT's increased budget and unforeseen weather delays RRMC wont be able to meet the deadlines on their awarded contracts without the adddition of another asphalt plant, that is why RRMC is applying for an additional lisence for an Astec Sic Pack asphalt plant. This plant has state-of-the-art technology that will allow RRMC to produce quality asphalt paving mixes with maximum efficency and doing so while safegaurding the environment. Asphalt Plants are relatively clean operations. Nevertherless it is important to identify all Environmental risks associatied with the operation thereof, and outlining the mitigating measeures to combat those risks. Through proper operation RRMC believes they can become an industry leader and provide Manitoba with quality asphalt pavements at cost effective rates, while complying to the highest of environmetal standards.

Introduction and Background

In recent years the province of Manitoba has become a "shining star" in Canada, which has stimulated growth and development. Essential to maintaining Manitoba's success of continued growth is the need to invest in infrastructure.

Russell Redi-Mix Concrete (RRMC) has invested in Manitoba to continue working with the Province in achieving these goals. As such, RRMC is looking to bring an Astec Six Pack 200 tonne per hour plant that is currently operating in Eastern Canada, mainly in Ontario. RRMC chose Astec because of their many impressive features allowing the environmentally safe production of asphalt products which meet or exceed Manitoba Highways and Infrastructure Specifications. Astec has been in the forefront of design and technology for the hot mix industry for over 50 years. Over that time, their focus has continued to be on advances in energy reduction and increased environmental controls to provide contractors with the cleanest and most pristine performing hot mix facilities in the industry.

The basic process that Astec uses is similar to most other parallel flow asphalt plants in the industry. There are a number of cold feed aggregate bins that collect the processed aggregate then proportionally add them to the drum for drying and mixing. Before the aggregates are dumped into the drum they go over a screen that removes all oversize materials and then over a belt scale to make sure the proper amount of material is being added. Once the material is in the drum the aggregate drying takes place, this is where the material is heated by the burner flame. As the material moves down the drum it is mixed together, after the material passes the burner it is introduced with recycled dust from the bag house and asphalt cement liquid. The dust from the drum is captured in the bag house where the dust particles are captured in the bags and drop down from where they are augured back into the mix. Once the all these materials are mixed together they are deposited in the drag slot conveyor which transfers the material to the load out silo where it waits to be dumped into a truck to be hauled to the project.

Although the process of asphalt production is similar to most other parallel flow asphalt plant producers there are many ancillary designs which set Astec apart from their competitors. Astec's Asphalt Plants are presently being operated under some of the most stringent environmental regulations around the world. As a result, Astec has incorporated such environmental parameters in every aspect of their standard designs. The Astec Six Pack 200 TPH Portable Plant uses a jet blast baghouse that captures the emissions from the drum and recombines the dust that the baghouse captures back into the mix. By using a baghoue the particulate matter released in the production of asphalt is minute compared to a straight stack asphalt plant.

The demand for increased Asphalt Production capabilities is evident in the recent provincial budget announcements. Manitoba has announced a record investment in infrastructure for the 2014 Budget, promising to invest $5.5 billion dollars into Manitoba's infrastructure over

the next five years (CBC). Approximately $3.7 billion dollars will go directly to Manitoba roads, highways, and bridges. In 1999 Manitoba's highways budget was $174 million and it since has tripled to $532 million in 2013. For the next 5 years the Manitoba Infrastructure and Transportation budget will average $750 million (CBC). The need to invest in infrastructure is to keep pace with the Province's anticipated growth, facilitate economic growth and the rehabilitation of existing infrastructure.

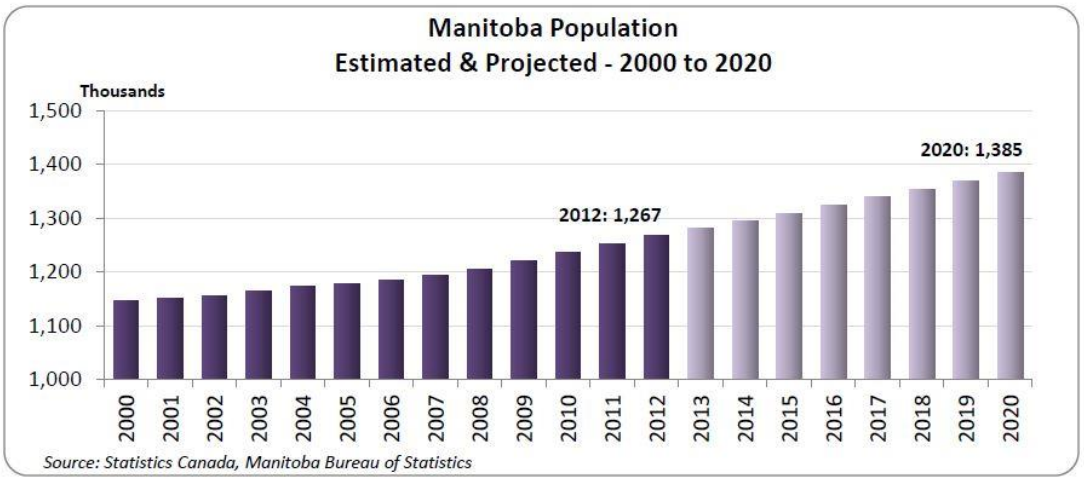
From 2009 to 2013 there has been a steady decline in amount of Asphalt tendered (see below for table).

Year	Asphalt Tonnes Tendered by MIT (Tonnes)
2009	1,135,250
2010	986,000
2011	536,200
2012	656,200
2013	486,300
2014	1,200,000*APPROXIMATE

However, in 2014, Manitoba is on track for a record year with approximately 1,200,000 tonnes of hot mix expected to be tendered. As a result, another portable asphalt plant makes economic sense for the province of Manitoba. Russell Redi-Mix Concrete has the support of many in Manitoba Infrastructure and Transportation (MIT) who realize Manitoba is lacking the necessary amount of asphalt producers to complete the anticipated volume of work. In addition, RRMC has been a long standing business in the Province, working hand in hand with government to improve infrastructure. An additional asphalt plant will maintain a healthy competitive market giving tax payers the most for their hard earned tax dollars and provide the province of Manitoba with another contractor to help facilitate the five year-year plan of building a stronger Manitoba.

*SOURCE: The Five Year Plan To Build a Stronger Manitoba	2013/14 Forecast	2014/15 Budget	2015/16 Planned	2016/17 Planned	2017/18 Planned	2018/19 Planned	5-Year Total
Roads Highways & Bridges	532	707	746	755	762	771	3,741
Flood Protection	64	42	49	54	68	107	320
Municipal Infrastructure	258	277	288	299	315	327	1,506
Total Planned Investment	*854*	*1,026*	*1,083*	*1,108*	*1,145*	*1,205*	*5,567*

Manitoba's population was 1,267,000 in 2012 and it is projected to rise to 1,385,300 by 2020 which is an increase of 9.3%. This relates to an annual growth rate of 1.1% compared to the 1% annual growth rate Manitoba had for the previous 8 years (2004 to 2012) (Winnipeg free press). With a growing population comes the need for a transportation network that can handle the current population along with the population growth. Since 42% of Manitoba's highways and road systems (MIT 2013 annual report) are comprised of bituminous pavement there will be a need to revitalize the existing roadways along with creating new ones to sustain future population growth and remain as a competitive province which promotes economic growth.



A number of contractors in Manitoba have successfully applied for "development license issued in accordance with the Manitoba Environment Act". This license would be described as a "Portable Asphalt Plant" and examples of such licenses are seen on Manitoba's "Conservation and Water Stewardship" website under "environmental approvals" and then "minor license alterations". From this web page there are eight licensed portable asphalt plants with Environmental License Numbers 2923, 2831, 2925, 2826, 2822, 2823R, 2823R and 2916 (Manitoba, conservation, minor license alterations). In addition to these licensed asphalt plants RRMC was just recently awarded a license to operate a Gencor 400 TPH portable asphalt plant in the Province of Manitoba (Licence No. 3105). All of the comments and recommendations that were communicated to RRMC in the last license application have been addressed in the section below titled "Description of Existing Environment in the Project Area" since most of the comments had to do with the location of the asphalt plant. "Summary of Comments/Recommendations" can also be found on the Manitoba government website for other contractors applying for an asphalt license, such as Mulder Construction and Materials Ltd. (Client File No.: 5443.00; Proposal Name: Asphalt Plant – Unit Terex, ES-400) and Borland

Construction Inc. (Client File No.: 5454.00; Proposal Name: Asphalt Plant – Terex, E3-400P, Unit 1006).

Description of Proposed Development

The location of the Astec Six Pack 200 TPH asphalt plant will vary from location to location throughout the province for the duration of the paving season based on government tenders and requirements. Predominately the plant will be set up in MIT owned pits, stipulated by the details of the contract.

The land the asphalt plant will occupy will vary from site to site depending on the nature of the project that the plant is supplying. Some examples of land that the plant may occupy will be pre-determined sites designated by MIT, such as a MIT gravel pits that will supply a MIT project. Other locations may be lay-down areas adjacent to a project for easy access to the project site. In addition to MIT owned lands, lay-down areas may be privately owned. However, locations cannot be pre-determined until the construction phase of a project has begun. Ultimately, in choosing the location for the setup of RRMC's Asphalt plant, it will be in full accordance with MIT specifications regarding bituminous mixing plants and the Manitoba Heavy Construction Association's "Best Environmental Management Practice", ensuring the maximum regard to traffic management and public health and safety.

When the asphalt plant moves onto a site, typically the native ground will be stripped of its topsoil and piled up adjacent to the plant. A proper base for the plant is usually constructed out of granular material to support the weight of the plant. The existing land will in most cases be a gravel pit but will vary from project to project, as well as the adjacent lands will all vary on a project specific basis.

Since the asphalt plant is going to be based in rural locations across Manitoba it will not be governed by planning jurisdictions such as "The City of Winnipeg Act". If in case this portable asphalt plant does come into contact with a planning area, RRMC will adhere to the laws that govern that specific area. In addition to local planning laws the "Primary Manitoba Temporary Asphalt Siting Criteria" (TAPSG) states:

- Minimum of 400 metres from a residence other than the residence of the landowner where the plant is located unless agreed to in writing by the residents
- There should not be more than four residences within 1000 meters of the asphalt plant unless otherwise agreed to in writing by the residents
- Temporary asphalt plants are to be reasonably located such that prevailing winds will not carry solid emissions to a community

This Astec Six Pack 200 TPH plant has operated for the past 20 years in Eastern Canada (mainly in Ontario) and is available to accomplish MIT projects as seen fit. Astec has produced hundreds of asphalt plants for customers all around the globe and they are one of the largest most advanced manufacturers of asphalt plants in the world. Since the asphalt plant is fully portable it has operated through the Province of Ontario helping complete numerous public infrastructure projects. When RRMC receives the proper approvals this plant will be delivered to one of RRMC's paving contracts where it will be assembled to produce asphalt for a MIT project. The location of this project has yet to be decided as RRMC has numerous contracts for asphalt paving with MIT for the 2015 paving season. Weather dependent the typical paving season and corresponding yearly asphalt production will be from May to November.

The funding for the purchase and implementation of this Astec Six Pack 200 TPH Portable Plant has been undertaken entirely by RRMC.

A "valid development license issued in accordance with the Manitoba Environmental Act" is required to perform asphalt production in Manitoba. Asphalt Production is not on the "Regulations Designating Physical Activities" therefore it doesn't require a federal environmental assessment (Canadian Environmental Assessment Agency).

During the licensing application the Environmental Approvals Branch will provide feedback to RRMC's application for the new asphalt plant. Similar feedback can be expected from archived "summary of comments/recommendations" found on Manitoba's government website. We anticipate comments/recommendations and will be happy to address them accordingly. Previous comments/recommendations faced by other applicants as well as comment/recommendations received by RRMC during the application of their previous asphalt plant, have been addressed in this proposal. RRMC looks forward to working with the community in this process to hear their concerns and try and work with various levels of community, municipalities and government and proactive measures to mitigate any concerns.

Description of Existing Environment in the Project Area

Since the Astec Six Pack 200 TPH asphalt plant is portable the location of the plant will vary through the asphalt paving season and because of this it will be hard to pin point a specific biophysical or socioeconomic environment that this asphalt plant will influence. For a majority

of the time the asphalt plant will be located in an existing aggregate source (such as a pit or a quarry) which will cause very minimal to no adverse effects on the existing area. Most likely the aggregate source will already be developed for aggregate extraction so the operation of the asphalt plant will not change the composition of the land. In the case where the asphalt plant is set up outside an aggregate source the natural land will be stripped bare of the fertile soil (if there is any) and the plant will be set up. Once the asphalt production is complete and the asphalt plant moves away the natural soil will be reinstated or however the land owner decides they would like it left. Since the duration of the asphalt plant's stay at any one location will be relatively short (depending on the size of the job but usually around 25 days) the impact that the plant will have on its surroundings will be minimal. On the other hand while looking at other previous license applications some factors will be taken into consideration such as:

- "The siting of a temporary asphalt plant shall be located at least 100 metres from any surface water and minimum a 30 metre buffer of natural vegetation is maintained between the perimeter of the asphalt site and the surface water" (comments/recommendations Mulder 2010).
- "Any contaminated liquid generated on the site (i.e. cleaning of truck boxes, fuel spillage) must be contained and all efforts to ensure the protection of groundwater and surface water resources should be implemented" (comments/recommendations Mulder 2010).
- "No asphalt plant without a pollution control device is to be operated within 3 km of any developed area of a provincial park (hiking trails, canoe routes, campgrounds etc.) to reduce disturbance to park visitors" (comments/recommendations Mulder 2010).
- "No asphalt plant is to be operated within 1.5 km of an ecological reserve or protected area within a provincial park to maintain the ecological integrity of these sites" (comments/recommendations Mulder 2010).
- "No asphalt plant without a pollution control device is to be operated within 3 km of any ecological reserve or protected area within a provincial park to maintain the ecological integrity of these sites" (comments/recommendations Mulder 2010).

Along with the aforementioned bullets, RRMC will adhere to any MIT specifications and conditions set out in a contract. Since RRMC has recently completed the process of apply for and in turn received a license for the installation and operation of a portable asphalt plant in the Province of Manitoba, a number of recommendations that where communicated in the process have been listed below from various government agencies.

Conservation and Water Stewardship:

- Without limiting other necessary regulatory approvals the proponent shall, prior to development on Crown land, apply for and obtain any necessary land tenure allocations in accordance with The Crown Lands Act, from the Crown Land and Property Agency.

- A Crown land Work Permit is required if not working under the Government contract. A work Permit from CWS will be required and should note the Environmental Act License number on the Application. The location of portable asphalt plant (with attached map), start up and approximate end date will need to be forwarded to the appropriate region for review at least 20 days prior to the set up and utilization of the Crown lands by the plant.
- The portable asphalt plant should be located in an existing clearing or at an existing site previously used for a similar purpose.
- If the portable plants are located within a Park or WMA, it may require separate review and approvals (review minimum 20 days).
- All heavy equipment will require appropriate fire equipment.

Infrastructure and Transportation:

- Permits may be required for any new, modified or relocated access connection onto a Provincial Truck Highway (PTH) or Provincial Road (PR) from Highway Traffic Board (for PTH's) or MIT (for PR's).
- Permits may be required for any construction (above or below ground level) within the controlled area of 38.1 m (125 ft) from the edge of the right of way of PTH and PR. Please note that PTH 1 has a larger controlled area for any structures being built within 76.2 m (250ft) from the edge of the right-of-way and control circle radius of 152.4 m (500ft), 304.8 (1000ft) and 457.2 m (1500ft) exist at some intersections with PTH's and PR's.
- Permits may be required when any change in use of existing access off a PTH.

Wildlife Branch:

- Recommend that RRMC refrain from removing native vegetation wherever possible, when setting up the plant outside of a quarry. If they must remove native vegetation, we recommend it be re-seeded to native, particularly on crown lands that are not protected areas.

Lands Branch:

- Without limiting other necessary regulatory approvals the proponent shall, prior to development on Crown land, apply for and obtain any necessary land tenure allocations in accordance with The Crown Lands Act.
- Under The Wild Fires Act Section 23(1) (not related to The Crown Lands Act), a work permit will be required in the burning permit area and during the burning permit season. The work permit application should note the Environment Act License number, the location of portable asphalt plant (with attached map), the startup and approximate end date will need to be forwarded to the appropriate

region for review at least 20 days prior to the set up and utilization of the Crown lands by the plant.

> ***Wild Fires Act:***
> ***Work permit required***
>
> *23(1) Subject to subsection (2), no person shall carry on the following work within a burning permit area except under the authority of a work permit identifying the land covered by the permit and describing the permitted work:*
> *(a) an industrial operation;*
>
> *(b) construction of a dam, bridge, or camp;*
>
> *(c) construction or operation of a mill that produces timber products;*
>
> *(d) an operation that is likely to cause the accumulation of slash or debris; (e) any other work prescribed by regulation.*

- The portable asphalt plant should be located in an existing clearing, pit or at an existing site previously used for a similar purpose.
- Any clearing requires prior approval and Timber Permit for an Merchantable timber.
- If the portable plants are located within a Park or WMA, it may require separate review and approvals.
- All heavy equipment will require appropriate fire equipment.

Office of the Fire Commissioner:

- As an oil-burning appliance, the portable asphalt plant is subject to the requirements outlined under The Gas and Oil Burner Act and Regulation. Prior to operation, please ensure the following:
  - the appliance must be approved and listed or labelled;
  - the installation for the fuel tank must be submitted for approval;
  - the installation must be in accordance with CAN/CSA B139-M91 entitled Installation Code for Oil Burning Equipment;
  - a permit for the installation must applied for and issued; and
  - the installation must be accomplished by a person holding a valid and subsisting license authorized by the minister.

Water Usage:

- In the past water usage of an asphalt plant was in question but in fact there is no water needed for the operation of an asphalt plant.

Description of Environmental and Human Health Effects of the Proposed Development

The impact that will take place on the biophysical environment will not be large in nature since the asphalt plant in question is portable. This means it will only have minimal impacts for a short duration of time until the work is completed. For the majority of the projects the portable plant will be in an existing plant site; therefore the plant itself will have no impact on the environment. In a case where the site has been altered for the plant, once the project has been completed the land will be restored to its previous state, or as stipulated by the owner of the property. Ground water and surface water will not be effected as all components of the Astec asphalt plant are self-contained and designed to be mobile therefore engineered to withstand rugged applications.

The type of emissions, that this Astec asphalt plant will release are carbon monoxide, volatile organic compounds, nitrogen oxides, sulfur oxides and particulate matter. To get a proper quantity of the amount of pollutants released per year by the plant we estimated a normal asphalt plant production of 200,000 metric tonnes per year. Not only does the yearly production have to be defined but also the type of fuel that will be burned and in this case burner fuel that meets the Province of Manitoba's specifications will be burned. With the parameters being set we come up with the following quantity and concentrations of pollutants per year.

Emission Type	Quantity (tonnes/year)	Concentration (mg/ dry std. Nm^3)
Carbon Monoxide	13.28	491.5
Volatile Organic Compounds	3.30	116.8
Nitrogen Oxides	5.63	208.3
Sulfur Oxides	5.93	213.4
Particulate Matter	3.00	91.5

To combat these emissions Astec has engineered numerous designs to their plants. The use of a bag house and a primary dust collector drastically cuts down the particulate matter (dust) emissions from this asphalt plant. All of the emissions that are produced in the drum while mixing the asphalt are sucked out of the drum and pulled the duct work. The primary dust collector stands in between the drum and the bag house and by using baffles it in turn takes out the larger dust particles out of the emissions. After the primary dust collector the emissions move to the bag house where are pulled through hundreds of hanging bags that capture the majority of the rest of the dust. Once the dust hits the hanging bags inside the bag house it falls to the bottom of the bag house where an auger lies. This auger then recirculates the dust back into the mix (which is optimal due to the elimination of waste) or into a silo waiting to be disposed of. The primary collector runs at 39.300 percent efficiency and the baghouse operates at a 99.932

efficiency which in the end means the total efficiency of the particulate matter emission reduction system is ***99.959 percent***.

Any toxic waste that an asphalt plant may produce is used oil from the changing of oil for lubricants. This used oil that is generated will be captured and stored in proper containers and disposed of through appropriate certified companies.

Burner fuel will be the fuel that will power the burner of the asphalt plant. The burner fuel will be stored in a double walled tank trailer for mobility purposes. The burner fuel will be pumped from the double walled tank right to the asphalt plant burner. This limits the amounts of transfers the burner fuel has to go through thus diminishing the possibility of a spill occurring.

RRMC's asphalt plant will not affect heritage resources since the location of the asphalt plant will be clear of any designated areas. Since the plant will be located predominantly in pre-determined pits from MIT there should be minimal interaction with heritage resources. In case RRMC's asphalt plant interferes with heritage resource, we will work with local governing bodies to mitigate the effects of the interaction, find an alternative location and avoid any impacts.

The operation of the asphalt plant will predominately take place in rural areas so socio-economic implications will be minimal, if any. In the case where the plant is set up in a pit the owner of the pit, be it MIT or a private land owner, will benefit from the royalties that the aggregate production will bring in for the material needed to produce asphalt.

Less than 50,000 tonnes of carbon dioxide equivalent per year is produced and therefore a report to the federal "Greenhouse Gas Emissions Reporting Program" (Environment Canada) is not required.

The potential impacts on human health are minimal due to setback requirements from any residential dwellings (Best Environmental Management Practice: Asphalt Plants). Noise is a byproduct of the productions of asphalt and the effects of such noise on surrounding populations will be minimal for the short duration of time and corresponding setback requirements. More harmful emissions such as particulate matter are absorbed by the primary collector within the baghouse. The other toxic emissions such as carbon monoxide, volatile organic compounds, nitrogen oxides and sulfur oxides are negligible quantities. An "Emergency Management Plan" will always be adhered to as per "Best Environmental Management Practices". The primary focus will be to ensure public health and safety. A Hazardous Spill Procedure will be in place prior to undertaking and work. Within the procedure will be emergency response plan (police, fire, EMS), emergency contacts (Manitoba Environment, Environment Canada, Emergency Company Contacts) and the location of the nearest hospitals.

Aboriginal Treaties

To mitigate the effects on aboriginals and treaty rights, RRMC will work with local aboriginals and the owner of the project to ensure compliance with all treaties. The positive effect of an asphalt plant moving into or close to an aboriginal community will be the addition of jobs to the area. In regards to aboriginal hunting, fishing, trapping, gathering, cultural and traditional activities prior to the set-up of the asphalt plant, rights and concerns of aboriginals in that community will be addressed to ensure compliance thereof.

Mitigation Measures and Residual Environmental Effects

The Astec Six Pack 200 TPH portable asphalt plant is designed to mitigate any risks associated with residual environmental impacts. The baghouse is 99.959 percent efficient, Asphalt Cement Piping and Pumps are a double wall jacketed design and the storage tanks are engineered with the utmost extreme durability. The fuel tanks for the Portable Generator are of a Double Wall Design. Burner fuel will be utilized to fuel the Burner which will be transported in Tank Trailers which will meet the requirements of Transport Canada's Transportation of Dangerous Goods (TDG Act).

The burner oil will be stored in a double wall tank mounted on a trailer for mobility purposes. The use of a mobile tanker eliminates the need of transferring the burner fuel. The burner fuel can be pumped out of the tank trailer directly to the burner, thus mitigating the risk of a spill. In addition, when the project is completed the remaining burner fuel will be hauled to the next location.

RRMC's plants are trained to mitigate the potential risk of hazardous spills. In addition, they are trained in accordance with the "Emergency Management Plan" along with the proper steps of containment and remediation of spills.

In case RRMC's proposed location to set up the asphalt plant may interfere with natural or heritage resources, RRMC will find an alternative location as to conserve and protect as its first priority.

RRMC places the protection of the environment and human health at the forefront. All appropriate steps of planning will be taken before a project commences. RRMC has a significant Health and Safety Staff which provide extensive pre project planning to ensure compliance with all applicable rules and regulations. This ensures that all RRMC employees have the required tools necessary to provide a safe working environment.

In compliance with the Best Environmental Management Practice, RRMC will ensure spill kits will be stored at the asphalt plant site. In addition, all storage tanks of hazardous material will abide by governing laws for storage, handling and disposal thereof.

After final production and the plant has been removed, RRMC will ensure the land is clean of any environmentally hazardous materials contained on the site as a direct result of RRMC's asphalt production.

The residual effects left on a site after an asphalt plant leaves are mitigated. With spill kits located on the site as well as containers to capture possible spills before they occur, the effects in turn will be negligible. If in case a spill does occur and hazardous liquid is released into the environment then the proper authorities will be notified and together with those authorities RRMC will work to contain and clean up the spill.

This Astec plant not only has a bag house but also a primary collector which improves the efficiency from 99.932 percent for a plant with just a bag house, to 99.959 percent for a plant with both components. The baghouse is extremely efficient and because of the design it houses more bags than other manufactures providing more filter area in a much smaller structure. This design will allow for the plant to run more efficient and lead to less emissions.

Follow-up Plans, including Monitoring and Reporting

In the operation of the Astec Six Pack 200 TPH portable asphalt plant RRMC will perform routine maintenance to the plant as specified by the manufacturer to ensure it is running at optimal efficiency as per design. A Ground man located at the asphalt plant during production will monitor compliance and ensure there are no environmental impacts with the operation thereof. Yearly over hauls on all major components during the winter, will ensure the plant will be operating at a maximum efficiency and in accordance with the environmental regulations.

Conclusion

RRMC sees great growth opportunities in Manitoba's Asphalt Paving industry. As a result thereof an additional asphalt plant will not only benefit RRMC but will benefit the province of Manitoba. This additional plant will provide Manitoba the asphalt capabilities required to meet the deadlines MIT has set in place for in the contracts RRMC has been awarded. In addition, this secondary plant will provide employment opportunities for Manitobans, since RRMC is based out of Russell, Manitoba. RRMC has been in the construction industry for over 50 years and has been working hand in hand with Manitoba Infrastructure and Transportation. Our work record, environmental attention and community care are established cornerstones of the business.

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