

## **SUMMARY OF COMMENTS / RECOMMENDATIONS**

**PROPONENT:** Manitoba Hydro  
**PROPOSAL NAME:** Brandon Combustion Turbine Plant  
**CLASS OF DEVELOPMENT:** Class 3  
**TYPE OF DEVELOPMENT:** Energy Production  
**CLIENT FILE NO.:** 4564.0

### **OVERVIEW:**

An Environment Act Proposal, dated September 28, 2000, respecting an Energy Production Development was submitted by Manitoba Hydro to the Department on September 28, 2000.

The Proponent proposes to construct and operate a combustion turbine plant housing two combustion turbine units, each rated with a nominal capacity of 130 megawatts, on a Manitoba Hydro's property at the site of their existing coal burning thermal generating plant in the City of Brandon.

The Proposal also involves the re-alignment of some Hydro transmission lines, but this is restricted to within Manitoba Hydro's property. Also, the proposal involves the installation of an additional buried gas pipeline involving the crossing of the Assiniboine River. Unless the use of directional boring proves impractical at the proposed site, and therefore may involve a physical disturbance of the riverbed, this activity, as well as the activity of re-routing the transmission lines, are being treated as stand-alone activities which on their own merit do constitute a Development under The Environment Act, and as such are not dependant upon being licenced under The Act before they can be commenced.

The Proposal was advertised in the Brandon Sun on October 14, 2000. As well, copies of the Proposal were placed in Public Registries at: the Environment Library (Main) in Winnipeg; the Centennial Public Library in Winnipeg; Manitoba Eco-Network; and the Western Regional Library in Brandon. The closing date for the receipt of public comments was specified as November 13, 2000.

Copies of the Proposal were also sent to the applicable members of the interdepartmental Technical Advisory Committee for their review and comment by no later than November 13, 2000.

Consistent with the standard recommendation of the department that the proponent encourage a program of public participation in the review of the Proposal, Manitoba Hydro held a Community Open House on June 29, 2000, in the City of Brandon, to explain their proposal to the public and to respond to any concerns or questions that

might be raised. The meeting was attended by only 9 local citizens. The nature of the environmental concerns raised by the citizens are, according to Manitoba Hydro, addressed in their Environmental Impact Statement.

- 2 -

.../2

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

No written or verbal concerns were raised by the public in response to the advertisement of the Proposal.

### **COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:**

**Rural Development** commented that:

- the property to be used for the proposed Development is zoned M3 Heavy Industrial District;
- Manitoba Hydro should investigate whether or not the Proposal is subject to any conditional use approval from the City Council;
- Manitoba Hydro should investigate whether or not any specific zoning setbacks from property boundaries may apply;
- Manitoba Hydro should advise whether any occurrence of vapour or other emissions arising from the operation of the proposed plant would be created such as to obscure traffic visibility along Victoria Avenue.

#### Disposition

The comments were referred to the proponent for consideration and response. The proponent's responses were referred to Rural Development. No further comments were submitted.

**Historic Resources** commented that they had no concerns with the Proposal's potential to impact heritage resources.

**Mines Branch** commented that they had no concerns.

**Manitoba Health** asked, why is continuous monitoring being proposed only for nitrous oxides and carbon monoxide? Is it felt that the ambient monitoring station located in Brandon will capture the other parameters?

#### Disposition

The comments were referred to the proponent for consideration and response. The proponent's responses were referred to Manitoba Health. No further comments were submitted.

**Policy Coordination Branch** commented:

- Should the preferred directional boring method of installing the gas pipeline across the Assiniboine River prove impractical, a proposal outlining a new method, the associated fisheries impacts and mitigative measures being proposed should be submitted to the Regional Fisheries Manager prior to construction.
- Water withdrawal for this development should be considered in context with other licenced withdrawals and the variability of natural river flows to ensure that adequate instream flows are reserved for the purposes of protection and conservation of aquatic habitat and life.
- The added withdrawal of water from the Assiniboine River will require continued compliance with current DFO screening guidelines for water intakes.

.../3

- 3 -

**Disposition**

The comments were referred to the proponent for consideration and response. The proponent's responses were referred to the Policy Coordination Branch. No further comments were submitted.

**Manitoba Highways & Government Services** commented that they have no concerns with the Proposal.

**Water Quality Management** commented that:

- they have no major concerns with the proposal if condition as as outlined in the Proposal are met; and
- if directional boring for placing the new gas pipeline under the Assiniboine River is not possible to undertake, then they wanted to be part of the consultation committee that would be set up to consider any acceptable alternative construction methods.

**Disposition**

The comments were referred to the proponent for their information. The proponent's responses were referred to Water Quality Management. No further comments were submitted.

**Air Quality Management** commented:

- The Transboundary Notification Air Issues Branch of Environment Canada should be notified of the Proposal because Under Article V of the Canada/US Air Quality Agreement, Canada is required to notify the US of any proposed new project within 100 km of the Canada/US border which is expected to emit greater than 90 tonnes per year of any one of the common air pollutants. The proposed project appears to be within the 100 km limit, and based on the information provided in the EIS, during a drought year the 90 tonnes per year limit would probably be exceeded for NO<sub>x</sub>, CO, and TSP.

- According to Manfred Klein of the Electric Power Section of Environment Canada, the plant would be ideally designed as a combined cycle plant to increase efficiency (by ~50%) which would reduce emissions. If the plant is to be built with a simple cycle configuration, then it should at least be designed so that it can be readily rebuilt as a combined cycle system in the future.
- On an environmental basis the operation of the combustion turbine plant should be given priority over the operation of the coal fired plant, yet the converse is being proposed for economic reasons.

Disposition

The comments were referred to the proponent for consideration and response. The proponent's responses were referred to Air Quality Management. No further comments were submitted.

**Canadian Environmental Assessment Agency (CEAA)** commented that the application of the Canadian Environmental Assessment Act with respect to this project will not likely be required, however they pointed out that Fisheries & Oceans and Natural Resources Canada will require more information.

.. /4

- 4 -

**Fisheries and Oceans Canada** requested:

- a riparian management plan respecting "natural" riparian vegetation on the land bordering the Assiniboine River should be submitted;
- a description of the new cumulative water withdrawal in relation to the present instream flow needs provisions for the Assiniboine River as they may affect fish habitat;
- a complete description of gas pipeline crossings including intermittent and ephemeral waterways;
- a discussion of anticipated impacts to fish and fish habitat from additional water being returned to the river; and
- data and analyses which demonstrate that the pumped intake screening system meets the Freshwater Intake End-of-Pipe Fish Screen Guideline (DFO, 1995) when the new cumulative water withdrawal is taken into account.

Disposition

The comments were referred to the proponent for consideration and response. The proponent's responses were referred to Fisheries and Oceans Canada. No further comments were submitted.

**PUBLIC HEARING:**

No public hearing was requested by any person following the advertisement of the Proposal.

**RECOMMENDATION:**

A draft Environment Act Licence, authorizing the construction and operation of the proposed Development is attached for the consideration of the Director of Environmental Approvals. It is recommended that the licence, if approved, be assigned to the Park-West Region for administration, surveillance, monitoring, ongoing compliance evaluation and enforcement responsibilities.

PREPARED BY:

C. Moche, P. Eng.  
Environmental Engineer  
Municipal, Industrial & Hazardous Waste Approvals Section  
Environmental Approvals  
January 5, 2001

telephone: (204) 945-7013  
fax: (204) 945-5229  
e-mail: cmoche@gov.mb.ca