

## SUMMARY OF COMMENTS/RECOMMENDATIONS

**APPLICANT:** SUN LINE LTD.  
**FACILITY NAME:** Permanent Asphalt Plant  
**CLASS OF DEVELOPMENT:** One  
**TYPE OF DEVELOPMENT:** Permanent asphalt Plant – Transportation  
**CLIENT FILE NO.:** 5115.00

### OVERVIEW:

On June 20, 2005, the Department received a Proposal from Sun Line Ltd. for the operation of a permanent asphalt plant located at 175 Pacific Street in Winkler. The plant is small in size and used oil will be used as a fuel for the heating of the aggregate.

On June 21, 2005 the Department placed copies of the Application in the Public Registries located at 123 Main St. (Union Station), the St James-Assiniboia Public Library, the Manitoba Eco-Network and the South Central Region Library in Morden. As well, copies of the Proposal were provided to the Technical Advisory Committee (TAC) members. The Department placed a public notification of the Proposal in the Winkler Times on June 24, 2005. The newspaper and TAC notification invited responses until July 25, 2005.

### COMMENTS FROM THE PUBLIC:

There were no comments were received from the public.

The City of Winkler responded that it is in agreement that a licence be issued for the asphalt plant.

### COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

1. **Culture, Heritage and Tourism** The Historic Resources Branch has no concerns with regard to this project's potential to impact heritage resources.

2. **Conservation** had the following comments:

1. A process description detailing the activities which occur on-site should include a listing of any on-site equipment used.
2. Information on material handling and storage on-site (e.g. types of material, quantities handled, how materials stored/handled/moved, how the materials are transported on- and off- site).
3. The distance and direction to the nearest residential and commercial property. A description of any air pollution control equipment or other methods used to reduce air emissions from the facility.
4. Although the proponent states that 2200 tons of asphalt are produced a year, it appears that the plant capacity may be closer to 21, 000 tons per year (i.e. 70 days/year , 10 hours/day, 30 tons/hour = 21,000 tons/year.)

## **2. Conservation (cont.)**

5. While the proponent does mention that air pollution (dust and emissions) could potentially be released from the site, no information is provided on what actions the proponent takes to minimize these releases. According to a letter attached to the proposal (Grandeur Housing Ltd), one of the neighbour businesses had concerns about these emissions.
6. Suggestion that the following documents be reviewed for control of emissions
  - Canadian Constuction Association, 2004. Environmental Best Practices Guide for Hot Mix Asphalt Plants. CCA-83
  - Ontario Hot Mix Producers Association, 2002. Ontario Hot Mix Asphalt Plants-Environmental Practices Guide. Third Edition.
7. Suggestions for licence of this operation include:
  - a. incorporation of the standard odour and noise nuisance clauses;
  - b. incorporation of the standard particulate matter emission clauses; and
  - c. reference to the CCA document as a best practices guide to be followed.

### **Disposition.**

1. The proponent provided additional description of the Development as well as photographs.
2. The proponent provided additional information regarding the storage of bulk materials.
3. The proponent provided additional information regarding the design of the air pollution control equipment. The closest residence is approximately ½ mile to the east, on the dairy farm that adjoins the Development.
4. The proponent indicated that the amount of asphalt produced was determined by a calculation taking into account how much asphalt cement was purchased per year and how much aggregate would be used . This calculation came to 2200 tons per year.
5. The proponent indicated that the emissions from the dryer would be controlled by a water spray system and that the aggregate pile dust was controlled by it being wet. It was noted by the proponent that there have been no complaints about his operation and also that the nearby operation of a foundry is a source of dust emissions.
6. The document produced by the Ontario Hot Mix Asphalt Producers Association was reviewed. The draft licence contains clauses that relate to particulate control, noise control, odour control, as well as waste control.
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## **3. Transportation and Government Services had no concerns.**

### **4. Health** Central Region noted that health concerns relate to the minimizing of air emissions.

It was also noted that when transient (portable) asphalt plants are used for highway construction, they have caused significant volumes of calls to public health (officials) concerning exacerbation of asthma due to irritants. Also, it was noted that the proposal does not indicate the location of the nearest households and

prevailing winds. Because the asphalt plant is in a permanent location it would be very important to establish air quality standard expectations for this company.

### **Disposition**

The Development is on the outskirts of Winkler, on the east side. North, south or westerly winds will not cause an impact on the town. The draft licence contains clauses that relate to particulate control, noise control, odour control, as well as waste control.

#### **5. Inter Governmental Affairs Community Planning Services Branch noted that:**

- The proposed development of the plant and disposal of the used oil will take place in the "MH" heavy industrial zone in Winkler.
- Asphalt and Asphalt Product are a conditional use in this zone.
- Minimum site requirement of total area is 10,000 sq.ft. and a minimum width of 100 ft. The site size according to the application will meet these minimum requirements.
- There are two development standards for the MH zone.
  - a) *In the MH zone, the total area of outside operations and storage shall not be greater than seventy-five percent(75%) of the total site area. Said outside operations and storage are not permitted in the required front yard; and*
  - b) *Where a fence is required, outside storage shall not project above the height of the fence.*
- *The intent of this zone is to provide for a wide range of industrial uses where a certain level of nuisance factor must be accepted as characteristic of the use. Wherever practical, these uses are located as far as possible from residential zones and in such a way as to minimize any detrimental effect on other uses of land. The project complies with the general intent of the Winkler Development Plan and Community Planning Services has no outstanding concerns with this application.*

#### **6. Canadian Environmental Assessment Agency noted that application of the Canadian Environmental Assessment Act with respect to this proposal will not be required. There were concerns/comments issued by Environment Canada and by Health Canada. These were:**

- In general, the Environment Act Proposal form provides little or no useful information on the potential environmental impacts of the proposed asphalt plant.
- Particulate matter less than 2.5 microns in size (PM<sub>2.5</sub>) has been declared toxic under CEPA because of human health and environmental concerns. The Canada-wide Standards for Particulate Matter (PM) and Ozone have been developed by CCME. The hot-mix asphalt sector is one industrial sector where emission reduction strategies for PM are being developed. Asphalt plants can emit very significant amounts of PM and gaseous emissions if not equipped with proper air pollution controls or if these controls are not operated or maintained properly.
- The proposal indicates that an approved water filter system can/will be installed to limit air pollution via water filtration. This does not provide sufficient information on the type of pollution control system that will be installed or how fugitive emissions will be controlled. We recommend that the proponent be required to submit plans and design specifications for the air pollution system to be used (to meet provincial licence limits), as well as a plan for control of fugitive dust emissions from aggregate and other feed materials, access roads, etc.
- It is recommended that the proponent be required to implement the Best Available Technology Techniques (BAT) outlined in Section 4.2 of the *Multi-pollutant Emission Reduction Analysis Foundation (MERAFA) for the Hot-Mix Asphalt Sector (September 2002)*, as prepared by Canadian Ortech Environmental Inc. and Environment Canada.

**Disposition**

The draft licence contains clauses that relate to particulate control, noise control, odour control, as well as waste control.

The proponent indicated that the emissions from the dryer would be controlled by a water spray system and that the aggregate pile dust was controlled by it being wet. It was noted by the proponent that there have been no complaints about his operation and also that the nearby operation of a foundry is a source of dust emissions.

**PUBLIC HEARING:**

A public hearing is not required.

**RECOMMENDATION:**

The Proponent should be issued a Licence, in accordance with the attached draft, to operate the Permanent Asphalt plant facility. Enforcement of the Licence should be assigned to the Red River Region.

**PREPARED BY:**

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