

SUMMARY OF COMMENTS / RECOMMENDATIONS

PROPONENT: Monarch Industries Limited
PROPOSAL NAME: Manufacturer of Hydraulic Cylinders and Pumps
CLASS OF DEVELOPMENT: CLASS 1
TYPE OF DEVELOPMENT: Manufacturing and Industrial Plant
CLIENT FILE NO: 4721.00

OVERVIEW:

A proposal was filed by Mr. David Klassen of UMA on behalf of Monarch Industries Limited for the relocation and continued operation of an existing plant to manufacture hydraulic cylinders and pumps from 889 Erin Street to an existing building at 51 Burmac Road in the City of Winnipeg. The Erin Street facility has been in operation since 1935. As the existing plant was operational and unlicensed prior to 1988, there was no requirement to obtain an Environment Act Licence post 1988. There have been no recorded complaints of noise and odour regarding the operation. The re-location of the plant has involved major renovations to the existing buildings at 51 Burmac Road. The owners apparently were not aware that they were required to notify the Department prior to relocating. Monarch was contacted by the Department regarding the relocation on August 31, 2001, and subsequently was directed to submit an Environment Act Proposal on December 3, 2001.

Production processes involved in the manufacture and assembly of hydraulic cylinders and pumps are: cutting, sanding, grinding, drilling, welding, corrosion protection of components, and shipping and receiving. There is a potential for emissions of particulate matter; coating vapours; solvent vapours; and noise. Some particulate emissions are controlled by filter panels and drum filters. There is no emission control for volatile organic compounds. Normal operation is 24 hours per day, 7 days per week.

The Department provided the Technical Advisory Committee with information on the Proposal and made public notification in the Winnipeg Free Press. The closing date for comments was December 21, 2001. The following summarizes the responses:

RELEVANT COMMENTS FROM THE PUBLIC

Sixty-six citizens submitted comments or concerns regarding the Development.

- Comment 1: Request public hearing.
Response: *The issues raised during the assessment have been for the most part addressed. Monarch has held a public meeting attended by the Department.*
Disposition: Deny a public hearing.
- Comment 2: Noise pollution will rise significantly because of truck traffic.
Response: *The area of the development is adjacent to a major truck route. It is possible there will be some additional local activity. This is scheduled primarily during normal work hours during the weekday. The licence will contain a noise nuisance clause.*
Disposition: No further action needed.
- Comment 3: Increased traffic flows on residential streets.
Response: *There is a potential for some increased traffic flow on some residential streets. The main access to the development for commercial vehicles is from Lagimodiere Blvd. directly on to Burmac Road. This is also true for workers. Monarch has stated they will educate their staff to use this access.*
Disposition: No further action needed.
- Comment 4: Use of Burmac and Capston as a truck route.
Response: *See comment #3.*
Disposition: No further action needed.
- Comment 5: Impact of air and noise pollution on urban forest and wildlife.
Response: *Impact modelling of potential air pollutants was conducted. Assessment indicated there would be no health related impacts. It is extremely unlikely that there would be any*

Monarch Industries Limited
Summary of Comments

- measurable effects on the 'urban forest' or wildlife. The effects of a major roadway within several hundred metres would be of greater impact. A study of noise impacts was not conducted. There is no indication that the operation at the development will create a noise concern which would impact wildlife.*
- Disposition: No further action needed.
- Comment 6: Negative impact on standing bodies of water in area.
Response: *See comment #5.*
- Disposition: No further action needed.
- Comment 7: Licence needs to restrict hours of receiving and shipping.
Response: *The proponent has stated that the majority of shipping and receiving will be during regular working hours. It has not been demonstrated that this activity will be a nuisance in the community.*
- Disposition: The licence contains a mechanism to address the noise issue if it is identified as a problem.
- Comment 8: Licence should restrict access to plant from Lagimodiere only.
Response: *See comment #3.*
- Disposition: No further action needed.
- Comment 9: Particulate, solvent and odour emissions.
Response: *There will be these types of emissions. Modelling has indicated that they are not of any health concern and most probably would not be a nuisance.*
- Disposition: No further action needed.
- Comment 10: Heavy industry next to residential objectionable.
Response: *This is a zoning issue with the Municipality.*
- Disposition: No further action needed.
- Comment 11: Air modelling didn't address health or environmental impacts on wildlife.
Response: *See comment #5.*
- Disposition: No further action needed.
- Comment 12: Noise pollution study done before they operate.
Response: *A study of noise impacts was not conducted. There is no indication that the operation at the development will create a noise concern.*
- Disposition: No further action needed.
- Comment 13: Removal of part of woodland between Lagimodiere and Southdale area.
Response: *The proponent is free to manage their property as they see fit within appropriate regulations.*
- Disposition: No further action needed.
- Comment 14: Devaluation of property values.
Response: *There is no indication this will occur.*
- Disposition: No further action needed.
- Comment 15: Paper advertisement not adequate notification.
Response: *Advertisement was standard.*
- Disposition: No further action needed.
- Comment 16: What are actual sizes of particulate matter – will they do real damage.
Response: *The particulate size was not determined. However, the modelling results indicated that even if all the particulate matter was of the size of major concern, there still would not be a health concern.*
- Disposition: No further action needed.
- Comment 17: When will actual factual data be made available.
Response: *The data from the modelling and the MSDS data are currently in the public registries.*
- Disposition: No further action needed.
- Comment 18: How much faith should residents have in data.
Response: *This is a decision that the resident will have to determine. The Department has reviewed the data.*
- Disposition: No further action needed.
- Comment 19: How can the consultant predict the effects from the relocated facility based on the situation at the existing facility.

Monarch Industries Limited
Summary of Comments

- Response: *The consultant used appropriate information and applied it to the relocated facility. This is not unusual or problematic if done correctly.*
- Disposition: No further action needed.
- Comment 20: What is given off per day from the paint and evaporator processes.
- Response: *This information is given in the consultant's air modelling report.*
- Disposition: No further action needed.
- Comment 21: What will it smell like.
- Response: *It is unlikely there will be a noticeable odour associated with the facility. If an odour were noticeable, it would most likely resemble paint or thinner odour.*
- Disposition: No further action needed.
- Comment 22: Increased traffic may result in access problems to Lagimodiere at Burmac.
- Response: *The proponent has discussed this with the City of Winnipeg. Additional traffic controls may be considered depending on circumstances.*
- Disposition: No further action needed.
- Comment 23: Need for monitoring and control of this facility by Monarch/Conservation.
- Response: *There will be requirements in the licence which Monarch must meet.*
- Disposition: No further action needed.
- Comment 24: Asthma; children; seniors.
- Response: *Concern regarding effects on this sensitive segment of the population is understood. However, effects analysis is determined on the average population, not the extreme.*
- Disposition: No further action needed.
- Comment 25: Control of emissions.
- Response: *There will be a requirement for additional study and control of emissions if warranted.*
- Disposition: No further action needed.
- Comment 26: Foundry operation?
- Response: *There will not be a foundry operation at this location.*
- Disposition: No further action needed.
- Comment 27: What are emissions – type, quantity, frequency.
- Response: *The emissions are described in the Environmental Proposal and the Air Modelling Report.*
- Disposition: No further action needed.
- Comment 28: Why is unlicensed development proceeding.
- Response: *The reasons for the existing development not having/needing an environmental licence have been explained. This development is now undergoing the approvals process.*
- Disposition: No further action needed.
- Comment 29: What do vapours and particulate matter consist of.
- Response: *See comment #27.*
- Disposition: No further action needed.
- Comment 30: What is the decibel rating of noise from the plant.
- Response: *This is currently unknown as the plant is not yet operating. If noise is a problem, further assessment can be initiated at that time. This requirement is identified in the licence.*
- Disposition: No further action needed.
- Comment 31: How will complaints about noise be addressed.
- Response: *Any complaints about noise will be addressed through the Noise Nuisance management protocol established by the Department. Copies of this area available from the Department.*
- Disposition: No further action needed.
- Comment 32: What will Monarch do to restrict traffic through residential district.
- Response: *See comment #3.*
- Disposition: No further action needed.
- Comment 33: What limit will be on emission levels.
- Response: *There are currently only limits for particulate matter. Volatile emissions would be assessed on their nuisance value if that becomes a concern. Modelling indicated that there should be no problems. Any of the volatiles emitted were in such small quantities as to not be of a health concern. There are mechanisms in the licence to address these types of issues should they arise.*

Monarch Industries Limited
Summary of Comments

- Disposition: No further action needed.
- Comment 34: What emission control/reduction measures will be employed.
Response: *There are mechanisms in the licence to address these types of issues should they arise.*
- Disposition: No further action needed.
- Comment 35: Who checks the operation to see that it follows environmental guidelines.
Response: *Inspections are conducted by Department staff to ensure compliance.*
- Disposition: No further action needed.
- Comment 36: What kind of track record does Monarch have.
Response: *The Department has no record of complaint regarding Monarch's current operation.*
- Disposition: No further action needed.
- Comment 37: Who is responsible for allowing Monarch to run an 'unlicensed development'.
Response: *See comment #28.*
- Disposition: No further action needed.

The appropriate comments were forwarded to UMA Consultants for response or responded to by the Branch.

RELEVANT COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

1. **Manitoba Culture, Heritage & Citizenship – Historical Resources Branch** – has no concerns.

No response necessary.

Disposition: No action needed.

2. **Manitoba Industry, Trade and Mines – Petroleum Branch** – has no concerns.

No response necessary.

Disposition: No action needed.

3. **Manitoba Intergovernmental Affairs** – have no concerns.

No response necessary.

Disposition: No action needed.

4. **Manitoba Conservation – Policy Coordination Branch - Conservation Programs Division – Climate Change Branch** – has the following comments:

- 1) Limited information was given in the proposal to assess potential air quality impacts. It would be preferable that some type of screening-level air quality dispersion modelling be undertaken. Although quantities of release to the atmosphere appear to be small, it is still possible that nuisance odours could arise. The licence should include the standard odour clause. The licence should include provisions to address quantifying emission release impact and controls, if this should be deemed to be necessary in the future.

The proponent was requested to perform and submit air quality dispersion modelling analysis. The resulting submission indicated that air emissions should not be a concern.

Disposition: No further action required regarding air quality dispersion modelling. The standard odour clause is included in the draft licence. Requirements for possible future emission quantification, assessment and control, as needed, are included in the licence.

Monarch Industries Limited
Summary of Comments

5. **Environment Canada – Canadian Environment Review Agency** – did not respond.

No response necessary.

Disposition: No action needed.

6. **Manitoba Conservation – Environmental Operations Division – Red River Region** – have no concerns.

No response necessary.

Disposition: No action needed.

7. **Manitoba Agriculture – Soils and Crops - Soil Resource Section** – did not respond.

No response necessary.

Disposition: No action needed.

8. **Manitoba Highways and Transportation - Highway Planning and Design** – responded that the project does not affect any roads under their jurisdiction.

No response necessary.

Disposition: No action needed.

9. **Manitoba Health - Public Health - Environmental Unit** – did not respond.

No response necessary.

Disposition: No action needed.

OPEN HOUSE:

Monarch conducted an open house for the community on December 19, 2001.

PUBLIC HEARING:

There were 13 requests for public hearings.

RECOMMENDATIONS:

A Licence considering the above relevant concerns as well as those of the Approvals Branch be prepared and issued. Responsibility for enforcement of the Licence should be transferred to the Region.

PREPARED BY:

Richard Johns
Municipal & Industrial Approvals
January 14, 2002
Revised: May 10 2002 (TAC response No. 6. only change)

Telephone: (204) 945-7023 / Facsimile: (204) 945-5229
E-mail: rjohns@gov.mb.ca