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June 18, 2013

Attention:

Eshetu, Beshada, PhD, Pen.

**Environmental Approvals Branch** 

Manitoba Conservation and Water Stewardship

Re: Western Concrete Products Environmental License Application

Regarding the email of June 05, 3013 requesting a response to two attached comments I would like to respond with the following:

Response to:

Perry Storehouse, Manitoba Conservation and Water Stewardship.

The site we propose to occupy is included in the Richmond Avenue Industrial Park. We are constructing within Brandon's newest Industrial Park that had to go through entire development process with the City of Brandon and abide by a development agreement that deals with all storm water issues for the park and how that impacts the surrounding area.

I have attached engineered drawings of the Industrial Park layout and the road works, ditches, collection ponds etc. for your perusal with the knowledge that any water coming off our site will end up in the engineered storm water management plan designed by the Industrial Park. As you can determine all storm water and natural water flows will go south through a ditch structure to a large comprehensive holding pond surrounded by a green zone.

The site itself has been built up to Engineered standards and there is no longer any low areas that seasonal watercourse would run through. Again elevations have been engineered and the site has been built up with base fill to the required levels and the natural water flows are now re-routed to the Industrial Park's water management plan. We have been instructed by the City of Brandon's Engineering Department to have all surface surplus waters flow from West to East, draining into the Industrial Park's drainage ditch system.

Our Engineer has now taken this Industrial Site and as you can see in the "Western Concrete Site Local Drainage" attachment, has developed a surface drainage plan that accommodates all water, dust, contamination concerns according to the provisions recommended by the Manitoba Ready Mixed Concrete Association, the Canadian Ready Mixed Concrete Association and the Manitoba Heavy Construction Best Environmental Management Practices. The site will be developed to this plan and signed off by our engineer complete with two highlighted concerns...

Email: info@westernconcrete.mb.ca

One being that 95% of the site will positively drain to the East side of the property where there will be a control filter built into the property before any water can exit the site. It will be a 30'x15' sand filtration system as per the Environmental Management Practices for Ready Mixed Concrete Operations per page 62 along with a 30'x15' enhanced grass swale as per page 63 of the same Environmental Management Practices for Ready Mixed Concrete Operations. All waters leaving the site will have to drain through this filter system, before being discharged into the subdivision Engineered Storm Water Drainage System (refer to the Subdivision Drainage Plan). The filtration system has built-in test apparatus access allowing for easy access to quality testing. Our firm will work with the City of Brandon Test Lab to monitor the site before construction to establish baseline results and then a program of post- construction testing will be developed in our commitment to abide by all stipulations of a Healthy Workplace and abide by our CORE Certification rules of the safe and clean workplace. Our firm will commit to periodic inspections of the filter and if necessary remediate any issues as they may appear. The system is designed to be easily remediated upon any indications of contaminates and are accessible for all public entities to inspect.

Secondly, in the South West corner of the property is a Waste Concrete area where all wash water and acid washing for the truck cleaning will take place. This area is built all of concrete and will not leach any water or contaminants into the above or below surface areas. There is a 3 stage waste concrete water reclamation system with a pumping system in the 3<sup>rd</sup> stage for assist wash out water to be recycled. All materials that settle from area 1 will be stored next to bin 3 until it dries and will be sold off as base material for the land developers market.

Response to:

Sandra Allison- Prairie Mountain Health

Before I go into detail with regards to the improvements planned for our new ready mixed operation I would like to reveal the existing relationship our firm has with the public concerns of running a ready mix operation. Our firm built the existing plant in an industrial area in the City of Brandon in 1953 and rebuilt a newer plant on the same land in 1992. The City of Brandon changed the zoning on the land adjacent to our property to allow for residential development in 1962. We have co-existed with residential neighbors directly across the street for over 50 years. Issues of dust, noise, traffic, water flows have been first and foremost on our corporate radar for all of this time.

We are now moving to a new industrial park in the City of Brandon where our plant will be over a quarter of a mile from any residential development and on major transport routes that will adequately deal with our larger trucks well into the future. The new plant is moving to state of the art dust collection systems that collect the airborne products that are generated from loading the mixers and blowing off the cementitious materials. As detailed in the original report the new equipment (with an investment of over \$400,000.00) will minimize any concerns that residential or commercial neighbors could have over airborne contaminants. The storm water control of the site has been engineered for construction and has a raised bar that no other commercial site in a public development in the City of Brandon, has had to construct or entertain. The water control is a system that is easily monitored and has the ability to be remediated if necessary. Regarding any noise issues, the site was specifically chosen and the size of the site was expanded to promote added distance from any other commercial entity. As previously mentioned we have now added a quarter of a mile of distance from any residential neighbor. Our immediate commercial neighbors to our north ARE our own sister company Allen and Bolack that run a heavy equipment operation, and house our combined corporate offices. We have developed the overall site with all aspects of traffic, noise and pollution, accommodated in a comprehensive manner focused on a long term co-existence.

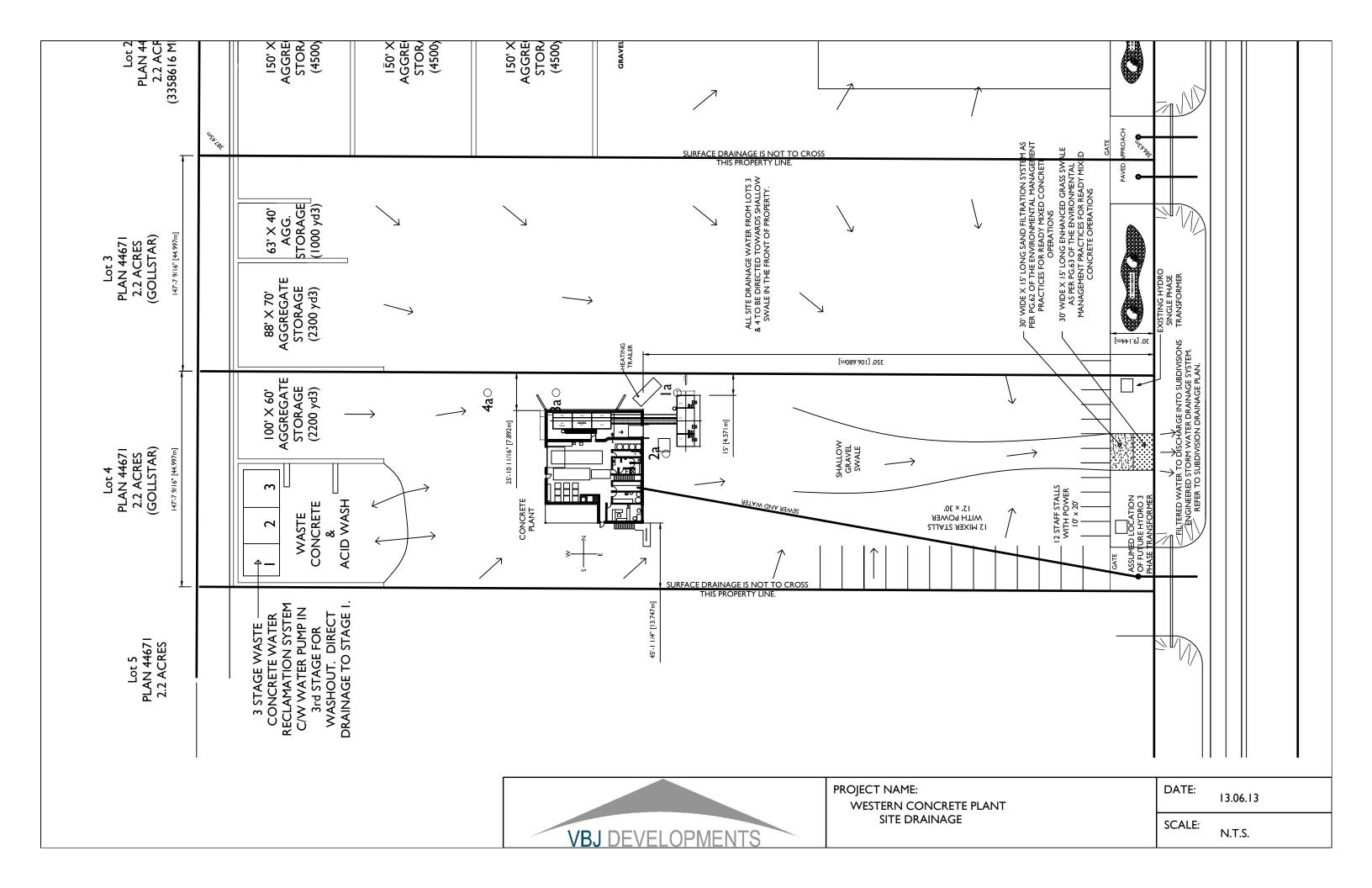
The Company CORE Certification Program demands mandatory monitoring, documenting and reporting all contaminant spills and/or concerns. Our Safety Officer is trained to accommodate any issues such as the above. From reviewing your concerns our corporate structure will now mandate to the program that it shall include investigating, documenting and reporting all public-or industry –identified concerns to ensure that the program continues to be a living process that is committed to ongoing quality improvement and is reviewable by the CORE Administration Process.

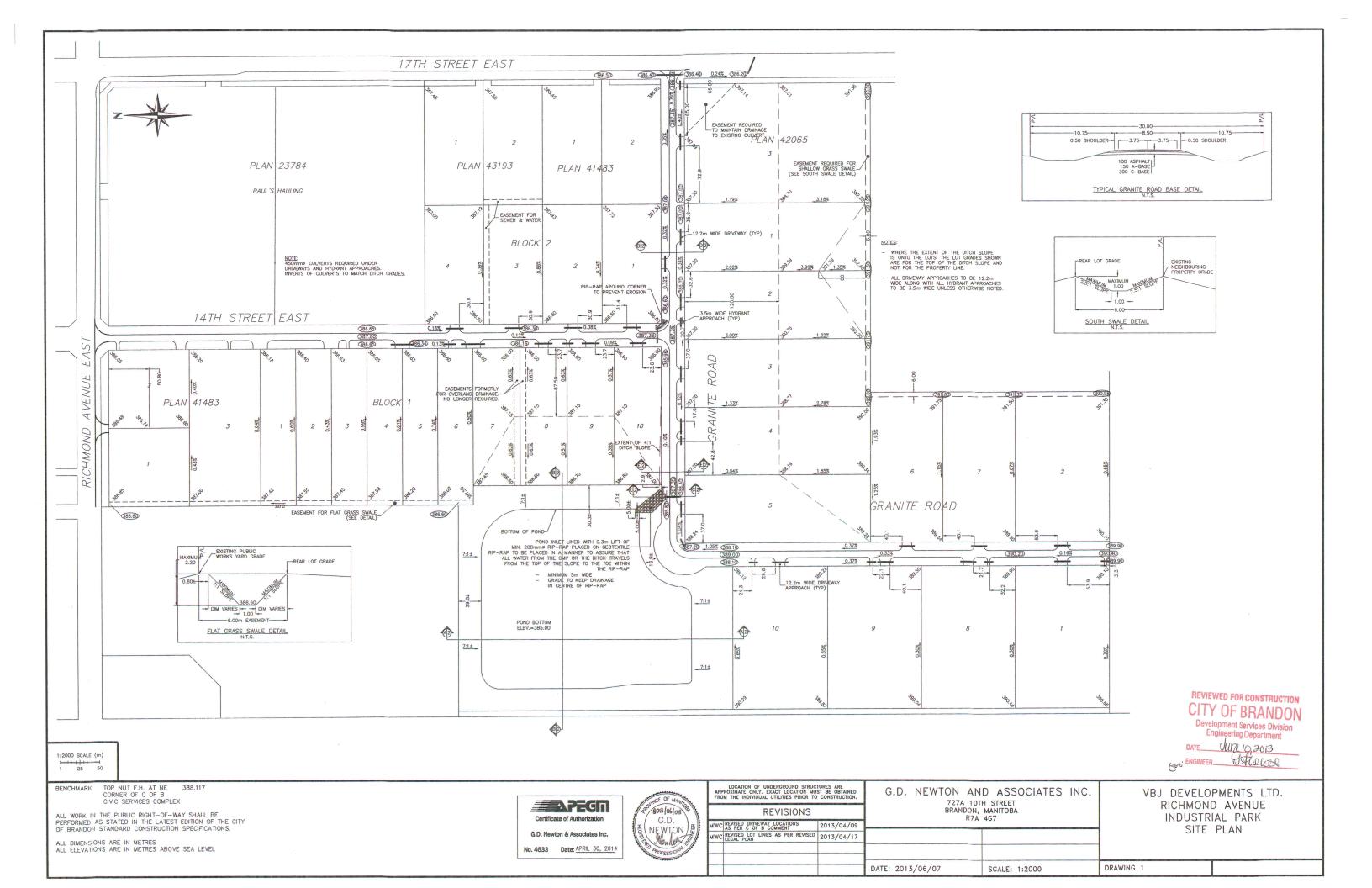
I trust that the follow up information I have provided is sufficient for the requested comments. Please contact myself if you have any additional concerns. Thank you for your time and attention,

Rick Golletz

General Manager/ Owner

Western Concrete Products





### **SAND FILTERS**

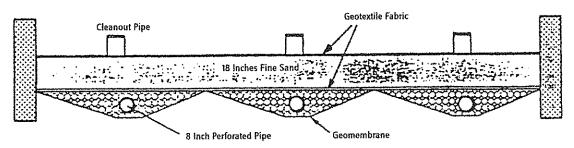
### Definition

Sand filters are a relatively new technique for treating storm water, whereby the first flush of runoff is diverted into a self-contained bed of sand. The runoff is then strained through the sand, collected in underground pipes and returned to the stream or channel.

Enhanced sand filters utilize layers of peat, limestone, and/or topsoil, and may also have a grass cover crop. The adsorptive media of enhanced sand filters is expected to improve removal rates.

In addition, sand-trench systems have been developed to treat parking lot runoff.

# Conceptual Design of a Sand Filter System



Source: Austin, Texas. 1991.

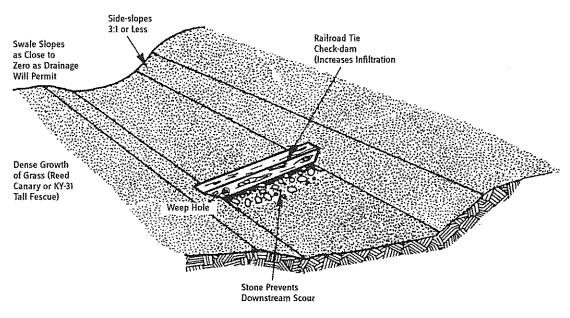
### **GRASSED SWALES**

#### Definition

**Conventional grassed swales** are earthen conveyance systems in which pollutants are removed from storm water by filtration through grass and infiltration through soil.

**Enhanced grassed swales,** or **biofilters** utilize check dams and wide depressions to increase runoff storage and promote greater settling of pollutants.

## Schematic Design of an Enhanced Grassed Swale



Source: Schueler, 1987.