

DATE: May 16, 2014

TO: Tania Steele

FROM: Eshetu Beshada, Ph.D., P.Eng.
Environmental Engineer
Mines and Wastewater Section
123 Main Street
Ste. 160 Union Station
Winnipeg, Mb R3C 1A5
Ph:204 945-7023

SUBJECT: **WS Machining and Fabrication Inc. – Information for Public Registries**

Tania,

Please find WS Machining and Fabrication Inc file (5694.00) response to the public and TAC comments for distribution to the public registries.

3 pages total

Thank you.

Eshetu Beshada, Ph.D., P. Eng.



WS Steel
49 Life Sciences Parkway
Steinbach, MB R5G 2G7
Ph# 204-326-5444 - Fax# 204-346-1450

12 May 2014

Eshetu Beshada
Environmental Approvals
Manitoba Conservation and Water Stewardship
123 Main Street, Suite 160
Winnipeg, MB, R3C 1A5

Re: Environment Act License Proposal – WS Steel

WS Steel has reviewed the memorandum regarding Section VI.4 Wastewater and Section II.4.1 Surface Water comments proposed by the Conservation and Water Stewardship Office in addition to the concerns brought forth by Mr. Kevin Miller.

- 1) With respect to wastewater, WS Steel does not generate any process related wastewater. The wastewater generated at the WS Steel facility would be akin to common household wastewater that is generated from washroom and kitchen facilities. Our processes utilize oil and lubricant cooling products that are handled by licensed companies when entering and exiting the facility. None of the WS Steel process products enter the wastewater system.
- 2) The surface water runoff discussed in the Environmental Application Proposal refers to common rain water runoff. There are no chemicals or constituents at the WS Steel facility that would contaminant rain water runoff. The rain water falls on the property, including the building roof, and is directed toward drainage ditches around the site. These drainage ditches eventually connect with the City of Steinbach's storm water system on Main Street and Hespeler Street. WS Steel does not have any concerns with respect to contamination of storm water runoff leaving the site.
- 3) Regarding Mr. Miller's zoning concerns, WS Steel was approved to build the current facility on M1 Light Industrial zoned land in accordance with City of Steinbach zoning by-law 1882. Since the initial approval, WS Steel operations have not changed. WS Steel operates a manufacturing facility where operations are contained within an enclosed building with some limited outside storage. WS Steel operations require the ability to move items from that outside storage area to inside of the facility throughout the hours of operation. In contrast, M2 Heavy Industrial zoning includes mining operations, railway terminals, salvage operations, shipbuilding and airports, which would not accurately reflect our operations or the levels of sound emitted from the facility. To be clear, there are no manufacturing operations that take place outside of the enclosure. There is forklift traffic that transports raw material in and out of

the enclosure throughout the hours of operation. WS Steel is confident that M1 Light Industrial zoning is appropriate and is supported by Community and Regional Planning Services Office in that respect as per file 5694.00 of that office.

To address the noise component of Mr. Miller's comments, WS Steel acknowledges that there is noise associated with transporting material in and out of the facility. This noise is intermittent and sporadic in nature. WS Steel realizes that steel can drop and clash against racking, forklift tines or other raw material during operations. WS Steel believes that these are occasional and isolated incidents that do not occur on a continuous basis. Mr. Miller suggests that overhead doors be closed during summer months, however conducted the sound recordings with an open window in his home. It's reasonable to expect that windows would be closed as a first effort to mitigating excessive noise that was causing disturbance in a home. While WS Steel believes that the noise produced external to the facility is in accordance with zoning and regulations, WS Steel is investing in technologies and process improvements that will reduce noise emissions in and around the facility. As one example, WS Steel replaced steel metalworking hammers with leather wrapped "Deadblow" hammers that emit much less sound on impact. In addition, WS Steel is conducting employee awareness training to reduce and limit unnecessary ancillary noise produced outside of the facility during the night shift hours (2300 - 0700 hours). WS Steel is going to great lengths to remedy the situation and will continue to modify operations to improve relations with neighbouring residential areas.

Lastly, WS Steel moved into the Steinbach industrial park zoned for industrial activities in 2005. The neighbouring residential area was expanded westward towards the rear of the WS Steel property after 2005. Mr. Miller states that he has lived in his home for 3 years, which suggests that he was aware of the fact that the property neighbored an industrial park upon purchasing the home. It is reasonable to expect that all real estate agents and home owners were aware that their properties neighbored industrial businesses at the time of purchasing the properties. It is also reasonable to expect that businesses will strive to grow and expand operations as opportunities present themselves, which includes expanding facilities to within regulated distances from their property line. WS Steel expansions and operations are conducted in cooperation with the City of Steinbach, Community and Regional Planning Services and all appropriate building codes, by-laws and zoning requirements. WS Steel believes that residential developers ought to consider the effects of building residential developments adjacent to industrial properties. It is unfortunate that these residents are experiencing discomfort as a result, however WS Steel facility was in place during the expansion of the residential development. The developers, planners and home owners need to accept some responsibility for their decision to build homes along industrial land. If the home owners believe that they were misled by real estate developers/agents as to the suitability of land for homeownership, they ought to consider pursuing the matter with those agencies, rather than looking to businesses that were established before development occurred.

In closing, WS Steel believes its operations are conducted in accordance with all zoning and by-law requirements. Wastewater discharge is comparable to typical household waste water and surface water runoff has no risk of being contaminated by industrial processes. Sound testing was conducted to quantify sound levels outside of the facility; the results were presented in the EAP report and met Manitoba Health and Safety requirements. WS Steel has

modified building designs and operations to improve sound emission levels and will continue to improve its operations in an effort to better the quality of life of residents affected by their proximity to the facility.

Sincerely,

A handwritten signature in black ink, appearing to read "Ellery Burton". The signature is fluid and cursive, with the first name "Ellery" written in a larger, more prominent script than the last name "Burton".

Ellery Burton, RMC, P.Eng
Engineering Manager
WS Steel
204-326-5444