

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPOSER: BHF Waste Management LLP
PROPOSAL NAME: BHF Hanover Commercial Composting Facility
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Manufacturing Plant
CLIENT FILE NO.: 5298.00

OVERVIEW:

On September 27, 2007, Manitoba Conservation received a Proposal dated September 21, 2007, for the construction and operation of a commercial composting facility located at Lot 4, Plan 16618 WLTO, NE 35-7-6 EPM in the Rural Municipality of Hanover. The facility will operate from Monday to Friday, for 10 hours each day, and will blend livestock manure with muskeg and wood waste, and further process the mixture to create compost. At full capacity the facility will generate 15 tonnes per day of compost which will be packaged in 10 litre plastic bags.

The Department, on October 25, 2007, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Winnipeg Public Library, the Manitoba Eco-Network, and the Jake Epp Public Library in Steinbach. Copies of the Proposal were also provided to the Technical Advisory Committee (TAC) members. A notice of the Environment Act proposal was also placed in the Steinbach Carillon on November 1, 2007. The newspaper and TAC notifications invited responses until November 30, 2007

COMMENTS FROM THE PUBLIC:

No public responses were received.

Disposition:

No action needed.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Canadian Environmental Assessment Agency

No concerns.

Disposition:

No action needed.

Manitoba Infrastructure and Transportation (MIT)– Highway Planning and Design Branch

MIT indicated that they had no major concerns with the proposal. However, additional information was requested from the proponent in order to determine the potential impact to the Provincial Highway System.

Disposition:

The proponent provided the necessary information to MIT. No further action was required.

Manitoba Agriculture, Food and Rural Initiatives – Land Use Branch

No comments received.

Disposition:

No action needed.

Manitoba Science, Technology, Energy and Mines

No comments received.

Disposition:

No action needed.

Manitoba Culture, Heritage and Tourism – Heritage

No comments received.

Disposition:

No action needed.

Manitoba Conservation

The following comments were provided:

- a) The proposal indicates that potential odour from the composting process will be reduced by the addition of shredded wood waste and the addition of biological agents. Beyond general descriptive product literature on the biological agent, no substantive cited quantitative information is provided on the practical use of these materials for odour reduction and the associated effectiveness in similar situations.

- b) The dilution ratio for addition of the biological agent is noted to be in the range of 1:2 to 1:1800. What site-specific information will be available to guide this application (other than “trial and error”)?
- c) No information appears to be provided on distances to nearby residents, other workplaces and recreational areas. This site appears to be adjacent to a rural residential yard site. Residential living could be impacted from the noise and dust generated from the daily activities associated with an industrial development. Potential groundwater impacts should be identified including the distance to nearest residences and to nearest water wells. A site drainage plan should be delineated.
- d) The facility and component processes do not fall within the scope or definitions of the *Livestock Manure and Mortalities Management Regulation*. Therefore no permit is required under the *Livestock Manure and Mortalities Management Regulation* for the construction or operation of the facility.
- e) All other applicable federal, provincial and municipal regulations and by-laws must be complied with and note specifically the requirements for the handling and transport of manure under the *Livestock Manure and Mortalities Management Regulation*.
- f) All operations exceeding 300 animal units are required to annually submit Manure Management Plans to Manitoba Conservation. Operations of this size must continue to submit the plans even if the manure is to be transferred to the facility. This would involve completion of Schedule C of the Manure Management Plan.
- g) Specify/identify what types and volumes of discharges/waste will be generated by all on-site processes including containment methods and final disposal of those wastes. Wastewater shall go to a registered on-site wastewater system per MB Regulation 83/2003.
- h) Identify how the input of raw manure will be controlled such that the on site manure storage capacity is not surpassed.
- i) Raw material storage should be restricted to contained facilities only, protected from the elements, only as specified in the proposal.
- j) Anti-spill containment should be specified for exterior discharge/ transfer ports
- k) The proponent should provide an air quality monitoring strategy
- l) Safeguards must be in place to ensure Specified Risk Materials are excluded
- m) The facility and site shall not be used as a waste disposal ground and sources of raw materials should be restricted to one or minimal suppliers. Identify the waste gypsum source and storage method.

Disposition:

The proponent provided additional information that satisfied the above listed concerns. Clauses 9 and 10 of the Environment Act Licence address concerns related to noise and odour.

Manitoba Intergovernmental Affairs and Trade – Community Planning Services

Comments provided indicated that a conditional use order and appropriate variations are required from the RM of Hanover. Community Planning Services also identified the potential for conflict related to the potential odours from the development.

Disposition:

Conditional Use Order No. 07-13 had been issued by the RM of Hanover. Clause 10 of the Environment Act Licence address concerns related to odour.

Manitoba Water Stewardship – Ecological Services Division

Manitoba Water Stewardship requested further information on where and/or how material components – muskeg (60 tonnes/day) and wood waste (30 tonnes/day) needed for the process are acquired.

The proponent responds that the source(s) of muskeg/peat have yet to be confirmed, but it is anticipated that these source locations will vary to suit supply requirements and minimize transportation costs.

Disposition:

No further action required.

PUBLIC HEARING:

A public hearing is not recommended.

RECOMMENDATION:

The Proponent should be issued a Licence for the construction and operation of a commercial composting facility in accordance with the specifications, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Eastern Region of Manitoba Conservation.

A draft environment act licence is attached for the Director's consideration.

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