

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: City of Brandon
PROPOSAL NAME: Landfill Gas Collection and Flaring System
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Commercial Biofuel Plant
CLIENT FILE NO.: 5472.00

OVERVIEW:

On June 12, 2010, Manitoba Conservation received a Proposal dated June 1, 2010 from Integrated Gas Recovery Services Inc. on behalf of the City of Brandon. for the construction and operation of a landfill gas collection and flaring system at the Eastview Landfill site at 3000 Victoria Avenue East in Brandon, MB. The facility will collect and flare landfill gas.

The Department, on June 30, 2010, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Manitoba Eco-Network, the Millennium Public Library, and the Western Manitoba Regional Library. 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 Brandon Sun on July 3, 2010. The newspaper and TAC notifications invited responses until August 3, 2010.

COMMENTS FROM THE PUBLIC:

No comments received.

Disposition:

No action needed.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Canadian Environmental Assessment Agency

No concerns.

Disposition

No action needed.

Manitoba Conservation – Aboriginal Relations Branch

No concerns

Disposition

No action needed.

Manitoba Conservation – Parks and Natural Areas Branch

No concerns

Disposition

No action needed.

Manitoba Conservation – Pollution Prevention

The following comments were provided:

- There was limited characterization of the landfill gas and combustion by-products in the proposal other than a statement quoting Environment Canada (Cheminfo Services inc., 2002). Landfill gas, aside from methane and carbon dioxide, contains H₂S, VOC, halogenated compounds such as methylene chloride, toluene and xylene and other compounds. To have a meaningful assessment of the expected emissions, a characterization of the landfill gas is needed.
- The estimated mass rate releases of these gases and the potential impacts on local air quality need to be determined and assessed. There is not enough information on the flaring system especially on efficiency of the combustion process to estimate emissions and potential dispersion. It is suggested that at the minimum, a Screen3 model be performed (data on mass emission rate of pollutant, total heat release due to the flare combustion and stack dimensions are required to run Screen3) on the proposal to determine impacts on local air quality.

Disposition

The proponent provided additional information that addressed the comments. Clauses 8 and 9 of the draft Environment Act Licence require ongoing monitoring and reporting of the flare emissions.

Manitoba Conservation – Wildlife & Ecosystem Protection

No concerns.

Disposition

No action required.

Manitoba Conservation – Environmental Operations

No concerns.

Disposition

No action required.

Manitoba Conservation – Environmental Services

The following comment was provided:

Environmental Services recommends that the Environment Act licence include provisions for record keeping and reporting consistent with the conditions of the funding agreement between the City of Brandon and the Province of Manitoba.

Disposition

Clauses 8 - 12 of the Draft Environment Act Licence require ongoing monitoring and reporting of the landfill gas collection and flaring system performance.

Manitoba Health – Assiniboine and Brandon Regional Health Authorities

The following comments were provided:

- The proposal identifies gas flaring emissions as mostly carbon dioxide and water vapour, with minimal emissions of NO_x, carbon monoxide, particulate matter, SO_x, dioxins, furans, chlorides and fluorides.
- It would be beneficial for the proposal to provide the ambient air quality guidelines, or references for the “other known national sources” upon which the anticipated emissions are being compared to. Quantification of the anticipated amounts of the emissions would also be beneficial in order to compare against the standards.
- Will occasional monitoring of the gas flare be considered to determine whether anticipated emissions are within acceptable standards?
- Consideration of inclusion in the license of a provision for odour and noise emission control and monitoring is also requested

Disposition

The proponent provided additional information that addressed the comments. Clauses 8 and 9 of the draft Environment Act Licence require ongoing monitoring and reporting of the flare emissions. Clauses 16 and 17 of the draft Environment Act Licence address noise and odour.

Manitoba Conservation – Sustainable Resource and Policy Management

No concerns.

Disposition

No action needed.

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

No concerns.

Disposition:

No action needed.

Manitoba Innovation, Energy and Mines – Mines Branch

No concerns.

Disposition

No action needed.

Manitoba Local Government

No concerns.

Disposition

No action needed.

Manitoba Water Stewardship

The following comments were provided:

- Manitoba Water Stewardship does not object to this proposal, at this time.
- The Manitoba Department of Water Stewardship is mandated to ensure the sustainable development of Manitoba's water resources. Manitoba Water Stewardship is committed to the goals of: protecting aquatic ecosystem health; ensuring drinking water is safe and clean for human health; managing water-related risks for human security; and stewarding the societal and economic values of our waterways, lakes and wetlands; for the best water for all life and lasting prosperity. Manitoba Water Stewardship achieves these goals, in part, through administering legislation, including The Water Protection Act, The Water Rights Act, and The Water Power Act.
- The Water Rights Act requires a person to obtain a valid licence to control water or construct, establish or maintain any "water control works." "Water control works" are defined as any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert borehole or contrivance for carrying or conducting water, that temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, OR changes or may change the location or direction of flow of water, including but not limited to water in a water body, by any means, including drainage. If a proposal advocates any of the aforementioned

activities, a person is required to submit an application for a Water Rights Licence to Construct Water Control Works. A person may contact the following Water Resource Officer to obtain an application and/or obtain information.

- A contact person is Mr. Ed MacKay, C.E.T., Senior Water Resource Officer, Water Control Works and Drainage Licensing, Manitoba Water Stewardship, 1129 Queens Avenue, Brandon, Manitoba R7A 1L9, telephone: (204) 726-6226, email: ed.mackay@gov.mb.ca.

The proponent needs to be informed that if the proposal in question advocates any construction activities, erosion and sediment control measures should be implemented until all of the sites have stabilized.

Disposition

The proponent has been made aware of these requirements.

PUBLIC HEARING:

A public hearing is not recommended.

RECOMMENDATION:

The Proponent should be issued a Licence for the construction and operation of a landfill gas collection and flaring system in accordance with the specifications, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Western Region of Manitoba Conservation.

A draft Environment Act Licence is attached for the Director's consideration.

Prepared by:

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