

SUMMARY OF COMMENTS / RECOMMENDATIONS

PROPONENT: Duha Color Services Ltd.
PROPOSAL NAME: Duha Color Services Ltd.
CLASS OF DEVELOPMENT: CLASS 1
TYPE OF DEVELOPMENT: Manufacturing and Industrial Plant
CLIENT FILE NO: 4318.00

OVERVIEW:

A proposal has been submitted by Mr. Dan Oleksiuk, P. Eng., on behalf of Duha Color Services Ltd. for the expansion and operation of a development located at 750 Bradford Street in the City of Winnipeg. The development manufactures colour strips including fandecks, colour cards, architectural kits and starter sets for the paint industry.

Specific processes include coating, printing, collating and binding, packaging and shipping finished materials. There is some potential for volatile organic and odourous emissions to the air. A cyclone is provided for particulate collection of the cleaning operation. The development is to operate 24 hours per day, six 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 following summarizes the responses:

RELEVANT COMMENTS FROM THE PUBLIC:

No comments were received from the public.

RELEVANT COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

1. **Manitoba Culture, Heritage & Tourism - Historic Resources** - has no concerns.

No response necessary.

Disposition: No action needed.

2. **Manitoba Industry, Trade and Mines - Industry Development Division** - is supportive of the venture.

No response necessary.

Disposition: No action needed.

3. **Manitoba Intergovernmental Affairs - Provincial Planning Services** - has no concerns.

No response necessary.

Disposition: No action needed.

4. **Manitoba Industry Trade and Mines - Petroleum and Energy Branch** - had no concerns.

No response necessary.

Disposition: No action needed.

5. **Canadian Environmental Assessment Agency** - did not comment.

No response necessary.

Disposition: No further action needed.

6. **Manitoba Conservation - Sustainable Resource Management Branch** - passed on the following comments.

- a) The air dispersion modelling primarily focused on peak exposures at the nearest residential area about 1 km to the south. Based on the modelling results, however, exceedances of the odour-based criteria are likely for several contaminants at receptors closer to the facility. Depending on the number of coaters (from one to four), from two to five pollutants may cause odour concerns in the immediate neighbourhood under adverse meteorological conditions. Receptors in that part of St. James include several hotels, shopping areas, a sports complex as well as local businesses.
- b) In Table 1, the maximum concentrations which occurred at 35 m from the source were only presented for the case in which one coater was operating; four air pollutants (*i.e.*, ethylene glycol monobutyl ether, n-butyl acetate, toluene, 1,2,4-trimethyl benzene) were shown to exceed their respective criteria. With four coaters operating, the number of pollutants which would have the potential to exceed their criteria increases to six (*i.e.*, ethyl acetate and xylene are added). A table showing peak exposure levels at 500 metres from the source for one to four coaters in operation should have been developed.
- c) While the air dispersion modelling used a conservative screening model (US EPA Screen3), the emission rates were not necessarily conservative. In Appendix A, it is noted that the average content of the individual VOCs in the product was used. While it is true, as argued in the Appendix, that using the maximum VOC content could result in the total VOC release being overestimated, the maximum rather than the average content is preferred for estimating the worst case emission rates for the individual VOCs. As a consequence, the pollutant concentrations modelled may have been underestimated.
- d) The odour nuisance clause should be included in the *Environment Act* Licence for this facility.

No response necessary.

Disposition: The Licence addressed these issues.

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

No response necessary.

Disposition: No action needed.

8. **Manitoba Transportation and Government Services - Highway Planning and Design** - did not respond.

No response necessary.

Disposition: No action needed.

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9. **Manitoba Health - Public Health - Environmental Unit - Winnipeg Regional Health Authority** - did not respond.

No response necessary.

Disposition: No action needed.

PUBLIC HEARING:

Public hearings were not requested nor convened.

RECOMMENDATIONS:

A Licence considering the above relevant concerns as well as those of the Approvals Branch be prepared and issued. Responsibility for administration of the Licence be assigned to Red River Regional Operations.

PREPARED BY:

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