

## SUMMARY OF COMMENTS / RECOMMENDATIONS

**PROPONENT:**        **KT Industries Ltd.**  
**PROPOSAL NAME:**   **KT Industries Ltd.**  
**CLASS OF DEVELOPMENT:**   **CLASS 1**  
**TYPE OF DEVELOPMENT:**   **Manufacturing and Industrial Plant**  
**CLIENT FILE NO:**        **4632.00**

### OVERVIEW:

A proposal prepared by D. Oleksiuk & Associates Inc. was filed by Mr. Dan Oleksiuk, P.Eng., on behalf of KT Industries Ltd. for the relocation and operation of a plant involved in developing technologies and converting services for the non-wovens, films, and foils elastomerics and paper industries. As well, sophisticated printing and converting machinery is to be manufactured. The development will be located at 530 Sheppard Street on Lot 7, Plan 27660, 45 St. John OTM 1/3 Kildonan OTM, in the City of Winnipeg. The development is expected to operate 24 hours per day, 7 days per week.

Processes include slitting, stacking, winding, laminating, coating and printing operations. There is potential for solvent vapour emissions to the air.

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 citizens submitted comments regarding the Development:

*No response necessary.*

Disposition: No action needed.

### 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** – did not respond.

*No response necessary.*

Disposition: No action needed.

3. **Manitoba Intergovernmental Affairs – Community & Land Use Planning Services** – have no concerns as long as the project will not have adverse effects on the adjacent residential and workplace environment.

*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. **Manitoba Conservation – Environmental Quality Standards – Air Quality Management Section** – had the following comments:

- a) Are the actual configurations and specifications of the stacks on the building known?  
*The proponent replied that the stacks are in the design stage which is based on “good practice” and modelled performance requirements. They are designed to achieve 3000 FPM emission velocity and stack height is 40’ above ground level.*
- b) Calculations used to estimate the solvent emissions should also be included in an Appendix.  
*The proponent provided emission calculations.*
- c) Will the exhaust flow rate of the stacks in the new facility be 3,000 FPM or will it be the flow rate shown in Table 1.  
*See item a) above.*
- d) Are ethyl acetate, toluene and MEK the only solvents used and emitted from this facility? A list of all solvents potentially emitted and their emission rates should be provided.  
*The proponent provided an extended list of solvents.*
- e) OMOE ambient air quality criteria apply to any location beyond the property boundary.  
*The proponent replied that correction of nomenclature is noted and that the criteria are being met by the modelled scenario.*
- f) The result of the stack height calculations outlined in Part 6 should be included for comparison with the 30-foot and 40-foot stack heights.  
*The proponent provided the requested calculations.*
- g) The model output for the 30-foot stack were not included.  
*See item f) above.*
- h) Comparison to occupational exposure criteria is not appropriate.  
*The proponent agrees and requests the statement in the proposal be removed from consideration.*
- i) The additional solvents reported in correspondence dated July 3, 2001, should be assessed for maximum concentrations and compared to the Ontario MOE criteria.  
*The proponent submitted the additional information to the TAC members satisfaction.*

Disposition: The Environment Act Licence addresses the relevant applicable items.

6. **Environment Canada – Canadian Environmental Assessment Agency** – comment that the application of the *Canadian Environmental Assessment Act* with respect to this project will not likely be required. Environment state that they would be able to provide specialist advice.

Disposition: No further action needed.

7. **Manitoba Conservation – Policy Coordination Branch** – forwarded comments already received.

Disposition: No further action needed.

\*8. **Manitoba Conservation – Environmental Operations Division – Winnipeg Region** – has the following comments:

- a) This proposal is basically a collection of MSDS's, and a dispersion modelling report. There is no process description, no idea of what (and how) they manufacture, no plant layout or stack diagrams. With the absence of any meaningful data, it is not possible to perform an informed review and assessment of this proposal.

*The proponent replied that the report format reproduces the sections as stipulated by Manitoba Conservation. Process descriptions are set out in Section 4. Drawings will be submitted as a licencing condition. Data and analysis has been provided.*

- b) KT Industries have not indicated the reason behind this relocation. From a theoretical standpoint it makes sense to consolidate all of the company's operations in one location. However from a financial standpoint, the costs of relocation usually are untenable unless an expansion or other reason drives the process.

*No response requested.*

- c) What is the "Chestnut Multicolour Printing Press"?

*The proponent provided a description of the press.*

- d) Both source and fugitive solvent (VOC) emissions have been identified. Fugitive emissions can be very significant depending on the exact nature of the process (i.e., release points vs containment) and how tightly the company controls handling and storage of volatile solvents and adhesives. Again, the absence of process information does not allow an adequate assessment.

*The proponent replied that the relocation will not result in an increase in fugitive emissions and that KT Industries expects to further reduce the current low levels.*

- e) The proposal contains references and MSDS sheets for only three solvents. I find it hard to believe that an operation of this type and size uses only three solvents. No MSDS's or other references were included for other products (adhesives, inks, etc.) used at this facility.

*The proponent replied that the submission clearly stated the solvents used. MSDS's were only provided for those solvents where usage would be a concern.*

- f) The proposed 1,000 gallon storage tanks will have to be registered with the department prior to installation, and also meet the requirements of MR 97/88R, the MB Fire Code, and ULC Certification.

*No response requested.*

- g) Noise emissions may be an issue depending on the relative proximity of residents (present and future) and other commercial properties to the KT Industries site.

*The proponent replied that noise had been discussed in the submission and as it was not a problem at the current location it was not expected to be a concern at the relocation.*

- h) There is insufficient data in the report to run any dispersion model. Why were only three solvents run?

*The proponent replied that additional information had been provided to the Department and the review had been accepted.*

- i) Stack heights are only identified with respect to ground level. Are the stacks free standing, or do the originate from the roof of the building? Where are the stacks to be located (Edge of the roof? Centre?)?

*The proponent replied that the modelling indicated that there was no building effect from the modelling situation proposed which would be impacted by stack location.*

- j) Has KT Industries investigated switching to non-VOC based inks?

*The proponent replied affirmatively.*

- k) Has KT Industries investigated solvent substitution to more environmentally friendly solvents?

*The proponent replied affirmatively.*

- l) Solvent usage rate is at least several hundred pounds per hour with no control technology. Where is all going? The dispersion modelling doesn't seem to adequately address this.

*The proponent replied that the modelling of emissions was based on worse case scenerios, and this has not indicated that there would be a concern.*

Disposition: A response to the proponents reply has not been received to-date. Any outstanding items are addressed in the licence.

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

*No response necessary.*

Disposition: No action needed.

10. **Manitoba Highways and Transportation - Highway Planning and Design** – have no concerns.

*No response necessary.*

Disposition: No action needed.

11. **Manitoba Health - Public Health - Environmental Unit – Winnipeg Regional Health Authority** – has the following comments:

- a) They have no major human health concerns regarding the local storage of the chemicals named in the EIA or regarding the emissions of the named chemicals into the outside atmosphere under the conditions and based on information provided by the Company.

Disposition: No action needed.

- b) They do have concerns regarding human health pertaining to the atmosphere inside the plant. Adequate precautions must be taken to protect employees of the plant from unsafe exposure to the chemicals mentioned.

*This is a workplace safety and health issue. The comments have been submitted to Manitoba Labour who are reviewing for these concerns.*

Disposition:  
See Manitoba Labour comments.

12. **Manitoba Labour - Workplace Safety and Health Division** – did not respond.

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 remain with the Approvals Branch pending completion of the relocation and commissioning of the facility.

#### PREPARED BY:

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