

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Custom Castings Ltd.
PROPOSAL NAME: Aluminum Foundry and Custom Castings Facility
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Manufacturing
CLIENT FILE NO.: 5581.00

OVERVIEW:

Manitoba Conservation and Water Stewardship received a Proposal on June 8, 2012 with amendments on June 3, 2013 for the operation of an existing Aluminum Foundry at 2015 Dugald Road in the City of Winnipeg. The facility manufactures aluminium alloy and zinc alloy castings using permanent mold and sand casting processes.

The Department, on September 10, 2012, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Winnipeg Public Library and the Manitoba Eco-Network located in Winnipeg. 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 Winnipeg Free Press on September 15, 2012. The newspaper and TAC notifications invited responses until October 15, 2012.

COMMENTS FROM THE PUBLIC:

The following comments/ concerns were provided by the public:

1. Grace Page

I am vigorously registering my opposition to Custom Castings' licensing application.

I would like to share with you some pictures (Attachment 1) of the physical evidence of the toxic matter from Custom Castings that wafts and settles over neighbouring residential properties.

My residence is directly North of Custom Castings. The large brown structure in the second picture is the rear of Custom Castings. The white object coated in reddish brown scum is a rain barrel that sits at the rear of our residence. Similar scum collects anywhere there is standing water.

South winds bring a choking stench from Custom Castings into our yard and neighbouring residences. The windows of our house that face Custom Castings are etched from the discharge from Custom Castings. Our fabric awnings were coated in a brown rust-like substance (pre-scrubbing last summer). None of this was experienced prior to Custom Castings' major expansions in past years. I have resided in this home for 26 years.

I question how Custom Castings has been able to run its foundry operation unlicensed, in the midst of residential properties, parks and playgrounds, and schools with what appears to be very

inadequate emission control. Close proximity to a residential neighbourhood and schools is not an appropriate location for an operation of this nature.

Kindly send further information regarding the licensing proposal. I thank you in advance for doing so.

Please consider the attached as an additional submission.

I received a copy of Custom Castings' Environment Act Proposal from one of my neighbours. While I am not in any way qualified to comment on the adequacy of the proposed emission controls, I would like to make some comments and clarifications regarding the neighbourhood situation, as noted under section 6.0.

The proposal states that Custom Castings ("C.C") has been in operation for 40 years (since 1972), and chose its current location based on the fact that it would not be in the immediate vicinity of private dwellings. It also indicates however, that in "recent years" surrounding lands have been rezoned as residential. These comments would lead an individual who is not familiar with the area to believe that the surrounding residential development is all *very recent*, while C.C. has been in operation for *decades*.

In fact, Phases I and II of Mission Gardens (Hatcher Road West to Bournais, and Bournais West to the CPR line, respectively) including Bernie Wolfe School, were developed in the early to mid-1970's. I am a former resident of that area. Further, Phase III of Mission Gardens (directly to the North of C.C.) was under development and inhabited in part, by the mid-1980's. This area has been steadily developed to the East, extending to Plessis Road since that time. The only "recent" residential re-zoning and developments are, to the North: Heartstone Estates (flanked by Mission Gardens Phases I and III), and the as-yet unnamed area currently being developed immediately South of Pandora, East of Atwood, and, Waterside Developments to the South of Dugald Road.

The "recent" events that have created a significant impact on C.C.'s relations with the surrounding area residents were (at least) two major expansions undertaken by C.C., and its decision to increase its hours of operation. While C.C. had been in operation (in a much lesser capacity) prior to Mission Gardens Phase III being developed, certainly when the decisions were made to expand, which eventually quadrupled C.C. in size, those decisions were made with the existence and awareness of the neighbouring residential properties to the North, North-East and the North-West. At the time of undertaking the expansions and increasing operating hours, consideration should have been given to the potential impact on the health of C.C.'s employees, the environment, and neighbouring residential properties that were already well-developed and occupied.

I ask that the decision-makers in this licensing application process give some consideration to the plight of residents and homeowners who are affected by the emissions expelled by C.C. Their concerns go far beyond "nuisance" complaints. Area residents who are outdoors and downwind

from C.C. on any particular day must contend with the following, or be prisoners in their own homes, with closed doors and windows:

- inhaling metal particulate;
- taste of metal in the mouth and throat;
- fear of developing cancer, respiratory or neurological diseases;
- deterioration of buildings, and to the health of trees and shrubs due to acid rain effect; and ,
- concern over dwindling property values if the area becomes less desirable to prospective purchasers than it has been in the past.

It would be no surprise to learn that the officers/directors/owners of C.C. are not resident in the area, but rather, have their homes in clean-air neighbourhoods that are a safe distance away from the emissions of their foundry.

Thank you for considering this additional submission.

2. Richard Moreton

They grossly understated this issue. I only ever put out seven documents to be signed by my neighbors as my back was totaled at the time. All seven responded. The pollution that this factory is creating is a known cancer causing agent. It does not matter about how much is acceptable. The answer is none is acceptable and they need to move this facility or have it shut down permanently. They have sighted that they only ever got one response from the paper work that they send out in the middle of summer in a community flyer that no one reads. They did not put it in the free press or post signs or anything. The document does not have an acceptable limit for the cancer causing agents. That's why these facilities rarely get a license to continue to murder the people around it. Unless they are guaranteeing that the sight is cleaned up and they will allow their own children to stand for one day and breath in these emissions. No one will do it. This is so disrespectful to the people that live around this area it is not even funny. If they require a rally at their faculty to shut down Dugald road they will get it. There are thousands of pissed off people. The companies selling the homes are not informing the purchasers of the new homes on Dugald that they are in a know cancer cause zone. That is not exactly full discloser. This is completely un -acceptable. I am going for open heart surgery on Wed. I will gladly head all of the committees when I am out. The additional information provided is presented in attachment 2.

3. Lorraine Scott

I am sending this email with grave concerns over the proposal filed by Lawren Bate of the above. We live right across from Custom Castings and find the smell and powder residue coming from this plant to have increased and become more of a nuisance and health hazard over the 25 years we have lived here.

For them to granted any ability to increase production without the strictest Environmental regulations being followed is very concerning to me and my neighbors.

Please do not allow them to cut any corners with their foundry and ensure they are held accountable to the strictest environmental rules possible.

Let me start by saying that Custom casting apparently put three notices in the community newspaper over the summer, a paper that no one reads. This is unacceptable, all residences in the flagged fallout area should have had fliers put in their mail boxes. It is also my understanding that because of the complaints made in the spring (acrid smell and eye irritation) the environment department investigated and they found that Custom casting was in fact emitting carcinogenic material. As a result of this the new homes being built on the south side of Dugald road, the builders were to notify the buyers. This is not happening as I have spoken to a few of the new home owners and they were never notified. Custom casting is applying for a licence to operate a smelter and foundry. This what they have been doing for the past couple of decades. This means they are operating illegally. Until this matter is resolved they should be shut down. I have requested and received their proposal for updating their plant and at no time in the proposal do they say that the emissions will be reduced. Yes they do say they will be putting in more efficient furnaces and other equipment but it does not elude that the emissions will change what so ever. I will be affected and have been for the entire time I have lived here. My suggestion to the owners and lawyers of custom casting bring their family members to the plant and have them sit by the exhaust stacks for a day or two and tell me they will not be negatively affected. I know they will not take up the challenge so why should any resident of the area have to put up with the emissions.

4. Leanne Paulicelli

RE: Custom Casting - Environment Act Proposal File 5581.00

I am writing this email to communicate my opposition to Custom Casting LTD's proposal to obtain a licence for the operation of an aluminum foundry and Custom Casting facility at 2015 Dugald Rd. This location is in a close proximity to many residential developments, Parks and Bernie Wolfe School. I am very aware of the health implications of an aluminum foundry in Custom Casting facility. Allowing this operation at this location is not acceptable to the families that already live or will be moving into the area because there are many new residential developments within a kilometer radius.

There are many publications on the severe health effects of this type of factory. If you require I can provide many sources of this information.

5. Kevin Klassen

I am writing this email to communicate my opposition to proposal for Custom Casting LTD. to obtain a license for the operation of an Aluminum Foundry and Custom Casting facility at 2015 Dugald Rd. This location is in a close proximity to many residential developments, parks and Bernie Wolfe School. I am very aware of the serious health implications of an aluminum casting facility as I'm sure you are. For City of Winnipeg and the Province of Manitoba to allow this kind operation at this location is not acceptable to the families that already live or will be moving into the area because there are many new residential developments within a kilometer radius.

There are many publications on the severe health effects of an aluminum casting factory. If you

require I can provide many sources of this information.

Disposition:

The facility is located in an industrial zoned part of the city. The proponent proposed to establish a Community Liaison Committee to resolve any environmental issues to the residents of the area. In addition Clauses 10 – 26 of the draft Environment Act Licence address air emissions/pollution/monitoring and clauses 5 and 6 requires the establishment of the Community Liaison Committee and hosting quarterly meetings.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Canadian Environmental Assessment Agency

No Comments.

Manitoba Agriculture – Land Use Branch

No Response.

Manitoba Conservation and Water Stewardship – Sustainable Resource Policy Management Branch

No Concerns.

Manitoba Conservation and Water Stewardship – Compliance and Enforcement Branch

I have reviewed the EAL proposal for Custom Castings and wish to make the following comments:

- Figure 5-2 – Process Flow Chart was not readily visible in pdf format.
- Table 5-1 – Phase 1 & 2 are to be completed over the next five years; however, there is no mention of how the success of the changes will be measured/monitored.
- Section 7.1.1 – The consultant has not provided sufficient scientific evidence to support the conclusion that the VOC impacts are “not significant” and “not a health impact” as no air quality monitoring has been performed. Furthermore, the statement made by the consultant regarding complaints coming from a rezoned area is an assumption made by the author of the proposal. It is standard procedure for any Environment Officer responding to a complaint, that complaint details are kept confidential and would not have been provided to the consultant or the operation.

Disposition:

The proponent provided a more legible process flow chart and discussed how to measure the success of upgrades proposed in phase 1 and phase 2. A detailed description of the health impacts of emission from custom castings was provided. Environmental Compliance and Enforcement Branch reviewed the additional information provided and had no further comment.

Manitoba Conservation and Water Stewardship – Programs and Strategies Branch – Air Quality Section

- As indicated in the submission, while there are strategies to reduce emissions, the Odour Response Plans seems to be focused more on improving capture efficiency and discharge at increased elevation for better dispersion. It is suggested that the proponent consider supplementing the current strategy with emissions control, control means not only installing devices (ex. filter, scrubber) to reduce emissions but also the use of alternative raw materials (ex. changing binders, solvents) and operational process changes to reduce the generation of air emissions. Some of the projects identified in Phase 3 will fit under a control strategy but it is not definitive if they will be implemented if complaints persisted.
- It is suggested that the proponent prepare a Complaint Response Plan, it is intended to be a process for identifying and documenting odour complaints and recording any action taken to address the complaint. This would be an effective tool for the Department in assessing odour related concerns attributed to the facility.

Disposition

The proponent provided additional information indicating implemented process change and those proposed to be completed in the next phase of the project. The proponent also indicated the implementation of phase 3 is continually revised; one project was recently upgraded to a phase 2 project. The proponent also proposed to submit a Compliant Response Plan. The Air Quality Section reviewed the additional information provided and has no further comment. The draft Environment Act Licence clause 14 addresses odour issue and clauses 5 and 6 requires the establishment of a Community Liaison Committee to address any environmental concerns of the residents in the area. Clauses 10 – 26 address air emissions/pollution/monitoring.

Manitoba Conservation and Water Stewardship – Wildlife Branch

No Response.

Manitoba Conservation and Water Stewardship – Parks and Natural Areas Branch

No Comments.

Manitoba Conservation and Water Stewardship – Forestry Branch

No Response.

Manitoba Conservation and Water Stewardship – Aboriginal Relations Branch

No Response.

Manitoba Conservation and Water Stewardship – Lands Branch

No Concerns.

Manitoba Conservation and Water Stewardship – Water Quality Management Section

No Comments.

Manitoba Conservation and Water Stewardship– Fisheries Branch

No Concerns

Manitoba Conservation and Water Stewardship – Office of Drinking Water

No Concerns

Manitoba Conservation and Water Stewardship– Water Use Licensing Section

No Concerns

Manitoba Conservation and Water Stewardship– Climate Green Initiative Branch

No Response.

Manitoba Conservation and Water Stewardship– Regional Services Branch

No Response.

Manitoba Culture, Heritage and Tourism – Heritage Branch

No Response.

Manitoba Innovation Energy and Mines – Energy Development Branch

No Response.

Manitoba Innovation Energy and Mines – Petroleum Branch

No Response.

Manitoba Infrastructure and Transportation – Flood Forecasting Branch

No Response.

Manitoba Infrastructure and Transportation – Highway Planning and Design Branch

No Concerns.

Manitoba Intergovernmental Affairs

No Response.

Manitoba Health – Environmental Health Unit

No Response

Manitoba Labour – Office of Fire Commissioner

No Response

Manitoba Labour – Work Place Safety & Health

No Response

PUBLIC HEARING:

A public hearing is not recommended.

CROWN-ABORIGINAL CONSULTATION:

The Government of Manitoba recognizes that it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

This facility is an existing operation located in the city of Winnipeg currently zoned for industrial use and there would be no infringement of aboriginal or treaty rights under Section 35 of the Constitution Act, 1982. Therefore, it is concluded that Crown-Aboriginal consultation is not required for the project.

RECOMMENDATION:

The Proponent should be issued a Licence for continued operation of Aluminum Foundry and Custom Castings Facility in accordance with the specifications, terms and conditions of the

attached draft Licence. Enforcement of the Licence should be assigned to the Environmental Compliance and Enforcement Branch of Manitoba Conservation and Water Stewardship.

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

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