

SUMMARY OF COMMENTS / RECOMMENDATIONS

PROPOSER: Sonoco Flexible Packaging
PROPOSAL NAME: Sonoco Flexible Packaging
CLASS OF DEVELOPMENT: CLASS 1
TYPE OF DEVELOPMENT: Manufacturing
CLIENT FILE NO: 5001.00

OVERVIEW:

A proposal prepared by KGS Group was filed by Mr. Ken Gudmundson on behalf of Sonoco Flexible Packaging, for the alteration and continued operation of a development located at 1664 Seel Avenue on Lot 1, Plan 23262, DGS7/10 St. Boniface in the City of Winnipeg. The development is an existing printing facility that manufactures flexible packaging and labelling products for the food and beverage industries. Processes include: mixing of ink formulations; web or film substrate printing, lamination and cutting; handling and storage of raw materials including solvents; and shipping of finished products. There is potential for emissions to the air. The development will operate 7 days per week, 24 hours per day with a 5 day shut-down at Christmas..

The Department provided the Technical Advisory Committee with information on the Proposal and made public notification in 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 Branch – has no concerns.

No response necessary.

Disposition: No action needed.

2. Manitoba Industry, Trade and Mines – Industry Development Division – did not comment.

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, Economic Development and Mines – Petroleum Branch – has no concerns.

No response necessary.

Disposition: No action needed.

5. **Canadian Environmental Assessment Agency** – commented that an environmental assessment of the project under the *Canadian Environmental Assessment Act* will not be necessary.

No response necessary.

Disposition: No further action needed.

6. **Manitoba Conservation – Sustainable Resource Management Branch** – provided the following comments.

- a) The ink mixing room - concerns in the event of a split hose.
Hoses have a shut-off valve. Spilled paint would collect and be contained in an adjacent room with a trenched floor.
- b) Empty/waste drum pick-up - concerns regarding a spill in conjunction with a severe rain event as the roof downspouts drain into this area.
The storage area will be curbed. Waste drums are picked up daily. The containment area will meet National Fire Code criteria.
- c) Flexographic printing press 1 - concerns in the event of a split solvent hose.
Hoses have a shut-off valve. There are no floor drains in the vicinity.
- d) Laminator 3 - concerns with respect to the uncapped floor drain adjacent to the stored adhesives.
A curb will be constructed around the drain.
- e) Solvent storage shed - concerns regarding the curb height surrounding the 1000 gallon above ground storage tanks. (required containment for a volume of liquid equal to 110% of the volume of the largest storage tank).
The containment area will meet National Fire Code criteria.
- f) There is no control equipment on the flexographic (4) and gravure (1) printing presses and laminating machines (3) resulting in VOC emissions to the atmosphere. VOC fugitive emissions from the facility (assumed to be 20% of the total VOC emissions) are also a concern.
Additional modelling of the emission release indicated that modification to the existing stacks would decrease the concentration of emissions off property.
- g) Table 10 (0.5h) and Table 11 (24h) indicate elevated concentration levels of certain compounds at receptor sites that are of an odour concern. The levels of n-propanol are a health concern.
Additional modelling of the emission release indicated that modification to the existing stacks would decrease the concentration of emissions off property.
- h) It is noted in the proposal under Empty/waste drum pick-up that there was 1 waste oil drum. Oil is not listed in the summary list of products as being a product used by Sonoco. Where is the waste oil generated?
Waste oil is from regular maintenance of gearboxes.
- i) Plate 10- drum pick-up area- shows that a dike blocks off the sewer drain. It is incorrectly stated that the concrete slab will contain spills. The pad itself is not diked so that a spill would not be contained.
A containment curb will be constructed.

The comments were forwarded to the proponent and the above italicized responses were received.

Disposition: Items a) to e) and h) and i) require no further action.
Items f) and g) are addressed in the Licence.

7. **Manitoba Agriculture, Food and Rural Initiatives – Agriculture Resources Section - Soils and Crops Branch** – did not comment.

No response necessary.

Disposition: No action needed.

8. **Manitoba Transportation and Government Services - Highway Planning and Design Branch** – has no concerns

No response necessary.

Disposition: No action needed.

9. **Manitoba Health – Winnipeg Regional Health Authority** – comment that always of concern is the potential risk to health secondary to emissions affecting air quality. It is anticipated that efforts to insure air emissions remain within the acceptable range.

No response necessary.

Disposition: This concern has been addressed in the licence.

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.

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