

Addendum Comment Index

Project Name: Waste Dangerous and Non-Dangerous Goods Temporary Storage Facility Addendum January 6, 2020

Government

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1	None Received	
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MEMORANDUM

DATE: January 10, 2020

TO: Brigit Tutty

FROM: Neil Morehouse A/Director of Protected Areas and Ecosystems

SUBJECT: Envirosystems Waste Dangerous and Non-Dangerous Goods Temporary Storage Facility Addendum

The Protected Areas and Ecosystems Branch have reviewed the Environmental Assessment Application for the Envirosystems Waste Dangerous and Non-Dangerous Goods Temporary Storage Facility

Protected Areas and Ecosystem Comments:

As the proposed facility will be constructed within the boundaries of an existing developed light-industrial operation, no direct impacts to protected areas are anticipated.

From: [Tutty, Bridget R](#)
To: [Tutty, Bridget R](#)
Subject: FW: Waste Dangerous and Non-Dangerous Goods Temporary Storage Facility EA ADDENDUM
Date: February 10, 2020 11:26:03 AM

From: McKenna, Chuck W <Chuck.McKenna@novascotia.ca>
Sent: January 21, 2020 8:31 AM
To: Tutty, Bridget R <Bridget.Tutty@novascotia.ca>
Cc: Brufatto, Matthew <Matthew.Brufatto@novascotia.ca>
Subject: RE: Waste Dangerous and Non-Dangerous Goods Temporary Storage Facility EA ADDENDUM

Bridget,

Response from Resource Management Unit below.

Chuck

Staff with NSE's Resources Management Unit have reviewed the addendum information submitted and have no further questions or comments.

Environment

Date: January 31, 2020

To: Bridget Tutty, Environmental Assessment Officer

From: Jonathan Gaudet, Regional Engineer ICE

Subject: EnviroSystems Dangerous Goods Storage and Handling EA (Dartmouth) – Addendum update

No additional comments on the addendum. My previous comments were addressed in the addendum as follows:

1. *In Section 5.3 Valued Component – Surface Water Resources, the following needs to be clarified:*

“A Stormceptor will be located immediately upstream of the outfall will prevent stormwater and potential spill contaminants from being discharged into the environment”

In the addendum it was clarified that this was for hydrocarbon impacts on the site only and not with respect to dangerous goods.

The second outfall pipe was not labelled or discussed in the EA, is it confirmed that the second outfall pipe is not connected to the catch basin network and does not require connection to the stormceptor?

The second outfall pipe shown in the original EA report was removed from the updated drawing in the addendum.

2. *Asbestos is to be handled in accordance with Asbestos Waste Management Regulations, exempt from Dangerous Goods regulations.*

Asbestos will not be handled or stored on site.

From: [Tutty, Bridget R](#)
To: [Tutty, Bridget R](#)
Subject: FW: Waste Dangerous and Non-Dangerous Goods Temporary Storage Facility Reminder
Date: February 10, 2020 11:26:15 AM

From: Vervaet, Sharon <Sharon.Vervaet@novascotia.ca>
Sent: February 3, 2020 9:23 AM
To: Tutty, Bridget R <Bridget.Tutty@novascotia.ca>
Cc: Seaboyer, Matt P <Matt.Seaboyer@novascotia.ca>
Subject: RE: Waste Dangerous and Non-Dangerous Goods Temporary Storage Facility Reminder

Hi Bridget,

The Air Quality Unit has reviewed the Addendum to the Environmental Assessment and does not have any comments. If you have any questions, please let me know.

Regards,

Sharon

Date: February 4 2020

To: Environmental Assessment Officer

From: Environmental Health Consultant, Sustainability and Applied Science

Subject: Addendum to Envirosystems Incorporated Environmental Assessment

Scope of review:

The focus of this Environmental Assessment Addendum review from the NSE Sustainability and Applied Science Division's Regional Environmental Health Consultant encompasses potential impacts on human health. In general, the scope of this review includes the assessment of the potential for the proposed undertaking/project to adversely affect human health in all phases of the project. Note that while general comments may be included, applicable technical specialists should be consulted for specific guidance.

Documents reviewed:

The documents outlined below formed the basis for this EA review, and is referred to as the 'Addendum' through the rest of this memorandum:

- Addendum to the Environmental Assessment Registration Document (EARD) – Prepared by Envirosystems Incorporated

Comments re: Addendum to the EARD – Envirosystems Incorporated:

The NSE Environmental Health Consultant (EHC) offers no additional comments beyond those provided for the original EARD.

Date: February 4, 2020

To: Manager, Water Management Unit

From: Senior Surface Water Quality Specialist, Water Management Unit

Subject: EnviroSystems Incorporated Addendum to EARD – Review Comments & Recommendations

Scope of Review

As Senior Surface Water Quality Specialist with the Nova Scotia Environment (NSE) Sustainability and Applied Science Division, the following EnviroSystems Incorporated Addendum to Environmental Assessment (EA) Registration Document review focuses on the following subjects:

- Surface water quality & its management
- General surface and groundwater resources, fish and fish habitat and their management

The following review considers whether the environmental concerns associated with the above subjects and the proposed mitigation measures have been adequately addressed in the addendum and Environmental Assessment. The recommendations provided below are meant to supplement the actions outlined in the EA submission documents.

While general comments on fish and fish habitat, wetlands, surface water quantity, and groundwater quality and quantity may be included below, applicable technical specialists should be consulted for specific review and comment.

Reviewed Documents

The following document was the basis for this EA review:

GHD. 2019a. *Addendum to EARD*. EnviroSystems Incorporated.

GHD. 2019b. *Environmental Assessment Registration Document*. EnviroSystems Incorporated.

Comments

General

- The addendum includes additional details on contingency planning, spill management, spill containment features and site drainage.

Surface Water Resources

- No details are provided in the EA and addendum on where the stormwater system outfall discharges to (e.g., municipal storm sewer or sewer collection system, drainage ditch, off-site as overland flow).

Surface Water Quality

- A preliminary stormwater system inspection and monitoring schedule is provided, which includes quarterly stormwater discharge water quality sampling. The specific contaminants of concern to be monitored are not listed and are identified to be as per NSE staff direction.

Surface Water Quantity

- A discussion is provided related to local topography at the site with respect to surface water drainage in the vicinity of the proposed facility location and how it will be managed during the operations phase, including potential localized flooding.

Recommendations

The following recommendations could be potentially developed as conditions in support of an Industrial Approval for the Project.

Operational Issues/Other Permitting Processes

Surface Water Quality

- A surface water quality monitoring program should be developed, based on the information provided in the EA and addendum, to monitor discharge from the stormwater collection system and the secondary containment system sump. The plan should identify contaminants of concern to be monitored that is based on the expected waste types and classifications to be received by the facility, including potential discharge criteria based on proposed stormwater management technologies and receiving water environment. This plan should be submitted to NSE staff for review and approval prior to the start of construction of the proposed facility.
- The outfall receiving environment should be confirmed to be a Halifax Region Water Commission storm sewer collection system. A written agreement with the Halifax Region Water Commission allowing the discharge of the stormwater from the upgraded stormwater system into the municipal sewer system should be received prior to the start of the construction of the proposed facility.
- A stormwater system maintenance plan that includes the Stormceptor, and based on the information provided in the EA and addendum, should be developed and submitted to NSE staff for review and approval prior to the start of construction of the proposed facility.

Surface Water Quantity

- The proposed stormwater collection system, including the Stormceptor, should be designed by a qualified professional. Pre- and post-development surface water runoff rates should be considered in the design with the objective of a zero increase in peak discharge from the project development area, which is proposed in the submitted preliminary design. The final stormwater collection system design should be submitted to NSE staff for review and approval prior to the start of construction of the proposed facility.

MEMORANDUM

To: Jennifer Rocard, Manager, Water Resources Management Unit

From: Hydrologist, Water Resources Management Unit, Sustainability and Applied Science Division

Date: February 5, 2020

Subject: EnviroSystems Waste Dangerous and Non-Dangerous Goods Temporary Facility EA Addendum Review Comments

Scope of review:

The scope of this Environmental Assessment review from the NSE Sustainability and Applied Science Division Hydrologist is to assess the potential environmental impacts and proposed mitigations of the proposed undertaking on surface water quantity and management. While comments may also include considerations for impacts on general surface water quality, groundwater, freshwater fish habitat, and wetlands, appropriate technical specialists for these areas should be consulted for specific review and comment.

Documents reviewed:

The documents outlined below formed the basis for this review:

- Addendum to EARD - 11 Brown Avenue – Dartmouth Nova Scotia – EnviroSystems Incorporated. Report Prepared by GHD. Dated December 2019, and accessed from <https://novascotia.ca/nse/ea/Waste-Dangerous-and-Non-Dangerous-Goods-Temporary-Storage-Facility/>

Comments and recommendations re: the submission:

Site Water Management:

- Proposed location of the works is within an existing industrial site, which is currently under NSE approval for used oil collection and storage.

- The management of on-site runoff is outlined, but it is not clear in the submission what is downstream of the site – i.e., what collection system or watercourse exists downstream of the outfall that is reported in the submission.
- The submission outlines details surrounding the plans for engineered containment features to mitigate risks surrounding release of substances stored on site.
- A figure that outlines high-level drainage of the site for post-construction conditions is provided in Appendix C. Considerations for flooding of the proposed area are not provided as part of the submission.

Conclusions & Recommendations:

The following recommendations are presented for consideration in the development of conditions for any approvals that may follow the EA process, if the EA is successful.

Operational Issues/Other Permitting Processes

- A surface water monitoring plan, including details surrounding the regular monitoring of the observation sump outlined in the submission, must be developed and submitted to SAS & ICE divisions of NSE for review and acceptance.
- The Approval Holder shall submit a site stormwater management plan to the Department for review and acceptance. This plan shall include final design details completed by a qualified professional, including details to support the mitigation of potential flooding of the storage facility and isolation of flows from higher risk areas, and considerations for matching pre and post development discharge conditions with consideration for the potential impacts of climate change. This plan shall also include considerations for the management of any water collected when the valve is closed, confirmation of the collection system found downstream of the site and any necessary agreements associated with that, as well as plans to operate and maintain any stormwater treatment facilities (e.g., Stormceptors) in line with manufacturer's specifications and recommendations.



Environmental Health Program
Regulatory Operations and Enforcement Branch
1505 Barrington Street, Suite 1625
Halifax, NS B3J 3Y6

February 5, 2020

Bridget Tutty
Nova Scotia Environment
1903 Barrington Street
Halifax, NS
B3J 2P8

Subject: Health Canada's Response –Addendum to Envirosystems' Waste Dangerous and Non-Dangerous Goods Temporary Storage Facility, 11 Brown Avenue, Dartmouth, NS

Dear Ms. Tutty:

Thank-you for your e-mail dated December 23, 2019, requesting Health Canada's review of the above-mentioned Addendum to Environmental Assessment (EA) Registration document¹ with respect to issues of relevance to human health.

Upon review of the above stated registration document Health Canada offers the following comments:

Emergency Response and Contingency Plan:

The proponent did not include municipal water and wastewater utility. As there is the potential for contaminants to enter the storm water system, this should be included in the Emergency Response and Contingency Plan. If you have any comments/questions, please contact the undersigned at your convenience.

Sincerely,

Sara Rumbolt, BSc., BTech., CPHI(C)
Environmental Assessment Specialist, Health Canada
e-mail: sara.rumbolt@canada.ca

cc: Beverly Ramos-Casey, A/Manager, Environmental Health Program, Health Canada, Atlantic Region