

JAN 31 2017

File # 2.3253.0004
Reg. #1838

Mr. Terrence Penney
Metro Environmental Services Limited
P.O. Box 19
Heart's Desire NL A0B 2B0

Dear Mr. Penney:

RE: Argentia Access Road Industrial Composting Facility

The Environmental Preview Report (EPR) submitted on November 25, 2016, has been reviewed and an opportunity to comment has been provided to the Environmental Assessment Committee (EAC) and the public, as required by the *Environmental Protection Act, SNL 2002, cE-14.2*. Upon consideration of the comments received, please be advised that the EPR is deficient and you must submit a revised EPR or addendum to that report.

The revised EPR or addendum will consider and address the following deficiencies, including, but not limited to:

1. Building design details identifying dimensions of the space required for mixing feedstock and wood fibre, and the space required for delivery trucks to enter the building, offload their cargo, and exit the building. These details may be included in the composting facility layout plan provided in Appendix 1 of the EPR.
2. Details of an appropriately sized biofilter that will be installed at the proposed composting facility specifying the design, size, and location of the biofilter(s).
3. Operational measures that will be undertaken to manage odour associated with the composting facility and with vehicles transporting feedstock to the facility, including, but not limited to:
 - a. scheduling feedstock deliveries to prevent trucks from waiting outside the facility to unload;
 - b. requiring feedstock delivery drivers to secure and cover their loads;
 - c. designing and maintaining the site access road to prevent spillage of feedstock from trucks approaching the facility;
 - d. minimizing the amount of time a building door is open at the facility;
 - e. blending organic feedstock with wood chafe and carbon fibre within 24 hours of receiving the feedstock;
 - f. using sufficient quantities of carbon fibre and bulking agents in the mixing process and throughout the entire composting process to minimize odour and prevent spontaneous combustion;

- g. having sufficient quantities of carbon fibre and bulking agents on-site at all times;
 - h. conducting regular maintenance on mechanical ventilation and biofilters;
 - i. conducting vigilant monitoring of temperature, air space, moisture level and moisture distribution throughout windrows and bulk soil amendment;
 - j. ensuring full maturation has been achieved before removing the finished soil amendment product from inside the building.
4. A revised estimate of the volume of compost that will be produced at the facility during the first year of operation, in consultation with the Pollution Prevention Division of the Department of Environment and Climate Change.
 5. A commitment to contract the services of a consultant with industrial composting experience to instill confidence in the public and government agency stakeholders that the undertaking, from the initial stages of operation, will be carried out in an environmentally acceptable manner.
 6. Additional employment information identifying positions in the construction phase that will be contracted out and those that will have some other form of hiring.
 7. An Odour Management Plan specific to the proposed project, including a procedure for recording and responding to public complaints.
 8. A Vector Management Plan specific to the proposed project, including a Fly Management Plan and a procedure for recording and responding to public complaints.
 9. An Emergency Response Plan specific to the proposed project, including measures that will be undertaken to ensure worker protection in an environment where noise, mechanical equipment and contaminated air may pose health and safety risks to workers.
 10. A Decommissioning Plan specific to the proposed project.
 11. A Fire and Emergency Protection Plan specific to the project, including identification of the on-site water supply and fire protection features. The plan must be developed in consultation with, and approved by, Fire and Emergency Services-NL.
 12. An Environmental Emergency Contingency Plan specific to the project, including identification of an approved alternate site for compost in the event of an on-site emergency, and an approved leachate disposal method for excess leachate.

If you have any questions regarding preparation of the revised EPR or addendum, please contact Ms. Joanne Sweeney, chair of the project EAC, at 709-729-2822, or email joannesweeney@gov.nl.ca.

Sincerely,



PERRY TRIMPER, MHA
District of Lake Melville
Minister