

Myers Industries Inc. Recycling Facility, Repair Shop and Office PID #163403, Lots 8 and 9, Poole's Corner Business Park, Roseneath, PEI Environmental Impact Statement

1. Proponent Information and Introduction

The proponent for this undertaking is Myers Industries Inc. (hereinafter called Myers Industries) whose head office is currently located at 592 MacDonald Road, RR3, Montague, PEI, COA 1R0. Myers Industries has been registered as a business corporation with the Province of Prince Edward Island since January 4, 2008 and they are an Island owned, family operated business. The contacts for Myers Industries include Garth Myers, Clinton Myers and Diane Myers.

This report was prepared for Myers Industries by Don Jardine of DE Jardine Consulting to fulfill the requirements of Section 9 of *the Environmental Protection Act* and *the Environmental Impact Assessment Guidelines*.

2. Project Description

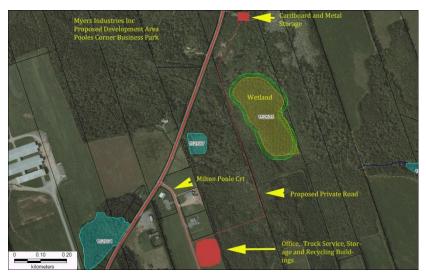


Figure 1 - Myers Industries Location Plan

Myers Industries is proposing to move part of their operation currently located at 592
MacDonald Road, Montague RR3 to a site located in the Pooles
Corner Business Park, lots 8 and 9
(PID # 163403) and adjacent parcels: PID # 163527 and PID # 163543 with access off Milton
Poole Crt, Pooles Corner Business Park. The business park is located in Roseneath a non-incorporated



Figure 2: Pooles Corner Business Park Showing Lots 8 and 9

area without an official plan or bylaws. The site is located in the Pooles Corner Business Park and two adjacent properties to the east and north. A licensed bottle recycling facility is located on the northern boundary of the site, forested and cleared land to the south and east. The proposed operation is going to be in two separate areas. The first portion of the operation to be built in the Pooles Corner Business Park includes an administrative office, recycling facility and truck service centre. The recyclables to be processed within the business park location are identified on table 1. The recyclables will be sourced mainly from the commercial customers of Myers Industries with boxboard and paper forming the majority of the materials processed at this location. All compost and black cart waste will be taken to the MacDonald Road site for processing and none of this material will be processed at the proposed site. All processing of materials will occur inside the buildings.

Table 1- List of Recyclables to be Processed within the Business Park Buildings

Material	Annual Tonnage
Metal	5
Paper	30
Cardboard	250
Comingled plastics (1-5)	10
Glass	2
Plastic bags	10

The second portion of the operation is going to be located on PID # 163543 at the location shown on figure 3. A building measuring 65 feet by 80 feet will be built to store processed cardboard. The structure of new building is a Tarp Barn with a pole structure foundation and will have the following features:

- Closed in End of building facing Alley's Mill Road
- East Side of building closed with 16' by 16' door
- East side of building will have a 36" man door
- North side of building will have a 36" man door towards Alleys Mill Road
- Building will be 115' from Bottle Exchange Property line
- Building will be 145' from boundary line of Alley's Mill Road (Route 4)
- Regular Hours of operation 7:00am 5:00pm for building on Alley's Mill Road

- Power supply will be coming from Alleys Mill Road
- Any Roll off containers containing product would be covered (tarped) and stored in the area of the south east corner of the storage facility in a compound area approximately 40' X 60'. No waste or compost materials would be stored at this location.



Figure 3 - Storage Building to be Located near Bottle Exchange on PID 163543

This building will also be used to store and do some preliminary processing of metal products such as iron, steel, brass, aluminum, copper and lead. The estimated quantity to be processed inside this building is provided on Table 2.

Table 2 – List of Metals to be processed inside building on PID 163543

Metal Product	Annual Tonnage
Steel	50
Cast Iron	7
Brass	18
Aluminum	20
Copper	12
Lead	0.5
Other metals	15

Myers Industries have recently secured contracts with Island Waste Management Corporation for collection of waste materials and they have a number of commercial contracts for managing waste, compost and recyclables from businesses across the province. Once the facility is completed, it is expected that 4.5 full time on-site jobs will conduct the site operations.

Myers Industries are proposing to construct 3 buildings on the business park property as per Figure 2. All buildings will be slab on grade construction with concrete flooring. Two of the buildings will be heated (Office and Truck Service Main Facility) and the third building (Storage and Recycling Centre) will not be heated and will have a fabric or tarp type outer shell.

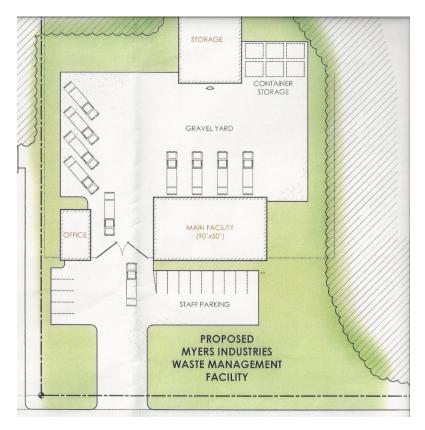


Figure 4 - Proposed Site Layout - Myers Industries - Business Park Location

The facility requires a fresh water supply which will be supplied by a low capacity (<45 L per minute) well drilled on site. Water is required for staff, washroom facilities and washing of trucks. An on-site sewage disposal system or an on-site holding tank will be provided for sanitary sewage generated on-site as per provincial regulatory requirements.

The trucks are typically washed once per month and washing will be conducted in a bay located in the main building using a Honda (13HP) with a 3000psi Cat Pump which uses about 10 L per minute. It takes approximately 30 minutes per vehicle for a maximum water usage per vehicle of 300 L. Over a month this would amount to approximately 3000 L. They plan to use a detergent product, Purple Power (or equivalent) for cleaning their vehicles. Wash water from the truck cleaning operation will drain to an oil water separator tank located just outside the foundation of the building. The liquid effluent will be discharged on gravel or crushed rock surface to disperse the effluent water on site. Solid materials, sludge and oily liquids will be removed from the oil water separator on an annual basis and disposed via a provincially approved method.

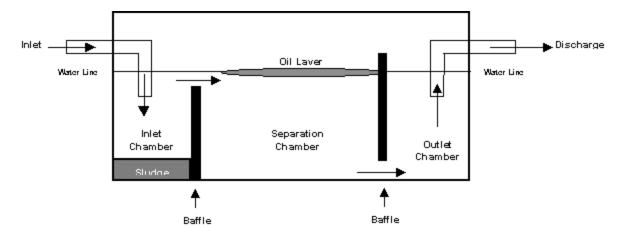


Figure 5 - Typical Oil Water Separator Design

All materials such as detergents and other cleaning agents will be stored in their proper containers in the truck maintenance building with the correct label. If products have a material safety data sheet (MSDS), the MSDS will be kept up-to-date and located in their storage location.

Electric power will be supplied from the 3 phase transmission line located on Highway #4. This will enable Myers Industries to install more highly efficient electric motors which they anticipate will reduce their power consumption by approximately 33%, when compared to their existing operation at MacDonald Road. Power to the storage building near the bottle exchange will come directly from the line along Alley's Mill Road or Route 4.

Fuel for collection vehicles will be stored at the new location in an above ground 4500 L double walled steel tank which meets ULC requirements. Heating fuel will also be stored on site for the truck service centre inside the building. The fuel used will be either domestic furnace oil or used crankcase oil. If the latter is used a CSA approved burner unit will be used. The office location will be heated with either electric heat or a wood pellet stove.

The collection vehicles used by Myers Industries will operate from this location. The largest truck used in their operation will be a 5 tonne unit and all trucks are equipped with hydraulic dumping mechanisms which reduce noise levels during waste transfer operations. All trucks meet provincial highway safety requirements and most meet 2007 emission requirements or newer as required under their residential contract with IWMC.

The 10 collection vehicles used by Myers Industries will be parked on site overnight and 5 to 8 of these leave the site and return each working day. Occasionally some of the trucks will be parked on site overnight with a full load of mixed waste from a commercial source. This material will be trucked to their MacDonald Road site on the next business day for sorting. Pick up of recycled materials being shipped to out of province markets will be made by tractor trailer units on a frequency of twice a month. The following is a project of vehicle traffic to the new site. Compost and remaining waste materials picked up on IWMC residential collection routes will not be taken to the Pooles Corner site and will

continue to be processed at the company's Macdonald Road location or taken directly to IWMC waste management facilities.

Table 3: Projected Vehicle Traffic

Type of Vehicle	Frequency per business	Frequency per month	Total per day (Avg)
	day		
Collection Trucks	30		30
Customer Vehicles	15		15
Staff Vehicles	30		30
Service Vehicles (i.e. oil		0.5	-
truck)			
Tractor Trailer		2	-
			75

Some of the collection trucks used by Myers Industries actually travel on this section of Route 4 on their existing routes so the increase in traffic on a per working day basis should be less than 75.

Traffic counts have been obtained from the PEI Dept of Transportation and Infrastructure Renewal for Route 4 in the vicinity of the new location. This is for the section of Route 4 between Poole's Corner and Route 313.

Annual Average Daily Traffic (AADT) for 2012 = 3914 Summer Average Daily Traffic (SADT) for 2012 = 5674 Winter Average Daily Traffic (WADT) for 2012 = 3226

The vehicle traffic to the new Myers Industries operation would be less than 2% of annual daily average existing traffic flow on Route 4 in this area.

The fourth building to be erected on PID # 163543 will be slab on grade construction with concrete or local sandstone working surface and permanent walls and roof. This building will not be heated and no washroom facilities are required for this building.

Access to the fourth building will be provided by a private wood brush road built from Milton Poole Crt, across Lot #8 in the Business Park, across the former Yorston property (PID # 163527) and then to the former Moore property (PID # 163543). This road will be constructed from the materials in the roadway itself. This private access road will be approx. 1km in length, 12' wide, and road to be constructed of material derived onsite (dirt surface) with possibly a dust proof product such as Nova Scotia gravel if deemed necessary. The location of this road can be seen on figures 1 and 3.

There are two wetlands on these properties as identified on Figure 1 and these will be avoided during the construction of the private road. Myers Industries Inc. plans to enhance the wetland areas on these two properties and will do this in the future with approval of the PEI Dept of Environment, Labour and Justice and with the assistance of a local watershed group.

3. Approvals

This proposed development requires a number of provincial approvals prior to construction and operation. A listing of these approvals is provided in table 4.

Table 4: Approvals Required-Roseneath Site

Required Approval	Legislative Authority	Department	Status
Recycling Plant Permit	Environmental Protection Act, Material Recycling Regulations (S2)	Environment, Labour and Justice	Application filed previously and is being amended
Environmental Impact	Section 9 of the	Environment, Labour	Amended for new
Assessment	Environmental Protection Act	and Justice	location in business park
Subdivision Approval	Planning Act, Subdivision and Development Regulations	Environment, Labour and Justice	Located within an approved industrial park – no subdivision required
Development Permit	Planning Act, Subdivision and Development Regulations	Environment, Labour and Justice	Application to be filed when land is procured
Entrance Way Permits	Roads Act, Highway Access Regulations	Transportation and Infrastructure Renewal	Applications to be filed – one for each lot
Sewage Disposal System	Environmental Protection Act, Sewage Disposal Systems Regulations	Environment, Labour and Justice	Application to be filed

4. Construction Phase

The construction activities associated with the new facility with a time frame and mitigation measures for each.

Table 5: Potential Contaminants and Mitigation Measures - Construction Phase

Activity	Begin Date	Completion Date	Potential	Mitigation
			Contaminants	
Clearing and	Immediately upon	August 15, 2013	Noise, dust	Restrict hours
Grubbing	approval			from 8:00am to
				7:00pm
				Retain tree buffers
Install entrance way	Immediately upon	July 31st	Noise, dust,	Restrict hours
from Milton Poole	approval		petroleum	from 8:00am to
Crt			products	7:00pm; dust
				control as

Excavation for slab on grade	August 1 st	August 15th	Noise, dust, petroleum products spill	required; as per provincial requirements for access to Rt. 4. Retain tree buffer on east side; dust control as required; spill
Building Construction and site preparation on business park property	August 1st	September 30th	Noise, dust, petroleum products	control kit dust control as required; spill control kit
Install well and septic system	September 1 st	September 30th	Noise, petroleum spill	As per provincial regulations
Install fuel tanks	August 31 st	September 30th	Noise, petroleum spill	As per provincial regulations
Install security features	September 15 th	October 15 th	Petroleum spill	As per standard industry practise
Build and construct private road to 4 th building on PID #163543.	May, 2014	June, 2014	Dust, noise, petroleum spill	Restrict hours from 8:00am to 7:00pm; spill control kit
Building Construction and site preparation on PID # 163543	June, 2014	August, 2014	Noise, dust, petroleum products	dust control as required; spill control kit
Erect signage	September 30 th	October 15th	Noise	As per provincial requirements

A spill response kit will be retained inside the bottle exchange building on a nearby property to the north and will include: a small boom, absorbent towels, a drum of oil sorbent granular material, brooms, shovels and these will be topped up after usage.

5. Operational Phase

The new facility will have main business hours from 7:00am to 5:00pm, Monday to Friday. Some trucks start out on their runs before 7:00am and will return after 5:00pm. This is necessitated by the having to travel to collection locations in West Prince and elsewhere in the province.

Shortly after the facility is open for business there will be an official opening which will include a site tour for any interested members of the public.

Most of the activities at the site will be conducted inside the new buildings. This includes sorting, compacting and baling of recyclable materials, repairs and maintenance of service vehicles and administrative activities. The materials to be sorted on site were previously listed on Table 1.



Figure 6- Site Access and Security Gate from Milton Poole Crt

Up to 20 metal bulk storage containers (4 to 40 cubic yards) could be located at the business park site during the operational phase. Any containers containing waste resource materials will be covered or tarped to prevent access to potential vectors. All containers and trucks parked at the site after hours will be inside a locked gate with a security fence (5 foot high chain link) on the perimeter area around the buildings.

Myers Industries Inc will at no time bury any waste materials on any of the land parcels associated with this proposal.

Potential environmental contaminants at the site during the operational phase with mitigation plans are shown on the following table.

Table 6: Potential Contaminants and Mitigation Measures - Operations Phase

Potential Source	Mitigation Method
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Contaminant		
Outdoor Noise	Trucks traffic,	container loading behind buildings; vehicle exhaust systems as
	unloading / loading	per Highway Safety requirements; hydraulic tail gate system
	containers	on trucks; all recyclable sorting and baling conducted indoors
Odour	Fuel burning,	Use CSA / ULC approved devices; keep containers covered;
	storage containers	remove containers regularly
Dust	Access road	Use no-dust crushed rock
Fuel Spill	Fuel tank, truck	Spill response kit to be kept on site; crankcase oil stored inside
	leakage	secure drums; no grease pit
Vectors	Metal containers,	Orkin Canada PCO Services to provide vector control as per
	buildings	professionally recommended schedule
Air Emissions	Trucks, fuel burning	Trucks meet PEI Highway Safety requirements and air emission
		vehicle requirements
Waste Water	Truck washing,	Disperse runoff water over wide area using gravel or crushed
	sewage system	rock; pump out septic or wastewater storage tank and treat off
		site.
Solid Waste	On site activities	All waste materials generated on-site will be removed and
		managed at provincially approved facilities or taken out of
		province for recycling.

A spill response kit will be retained inside the truck maintenance building and will include: a small boom, absorbent towels, a drum of oil sorbent granular material, brooms, shovels and these will be topped up after usage.

Fire extinguishers will be provided inside all three buildings and emergency call numbers for the local fire department, EMS, RCMP and environmental emergency response will be posted in a prominent location. The site is located in the Cardigan Fire District and their fire hall is located within 3 kilometres of the proposed site.

6. Environmental Description

The business park portion of the study site has been cleared and awaiting development for the past 20 years. The remainder of the study site was formerly forested land which may have been farmed many years ago but has been forest land for over 20 years. It appears the properties were clear cut over 20 years ago but re-growth has been occurring since that time with a mixture of softwood and hardwood species. There are remnants of cut wooden logs and blocked wood which is in a state of decay.

The main soil type in the proposed business park development area is the Alberry series which normally has good drainage characteristics for on-site sewage disposal systems. There are no existing wells, springs, or streams on the property being purchased with the nearest watercourse being well over 500 m away. Private wells are located in existing businesses in the business park and these obtain a reliable source of potable water. A check for groundwater quality results for the community of Roseneath was conducted on the PEI Government website. A summary of these results is provided in table 7.

Table 7: Groundwater Data: Water Quality Parameter Summary Results –Roseneath, PEI

Parameter Ur	Init Avg. Leve	Max.Level	Min. Level	# of samples
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Alk total	mg/L	111.6	147.0	86.1	9
Cadmium (d)	mg/L	0	0	0	6
Calcium	mg/L	28.4	38.8	23.2	5
Chloride	mg/L	60.88	136.18	.7	9
Chromium (d)	mg/L	0	0	0	6
Iron (d)	mg/L	0	0	0	7
Magnesium	mg/L	15.51	21.2	12.82	5
Manganese	mg/L	0	0	0	5
Nickel (d)	mg/L	0	0	0	6
Nitrate-N	mg/L	2.16	4.2	0.80	9
pH (lab)	pH units	8.09	8.4	7.8	9
Phosphorous	mg/L	0.05	0.09	0	5
Potassium	mg/L	2.06	2.55	1.81	5
Sodium	mg/L	21.88	90.9	4.08	5
Sulfate	mg/L	7.17	17.0	2.29	5

Once a well is drilled on the property it will be developed and then the water will be tested for suitability for human consumption. Based upon the above table no major water quality issues are anticipated as all results fall within Canadian Guidelines for Drinking Water.

7. Public Consultation Plans

The proposed project is considered a level one public consultation and the proponent plans to meet the minimum standards as established for level one public consultation as prescribed by Appendix G of the Environmental Impact Assessment Guidelines as revised January 2010.

The proponent will post one notice in a Saturday edition of the Charlottetown Guardian and one notice in the Eastern Graphic Newspaper listing contact information for any questions which may arise as part of the Environmental Assessment process.

. The new operation is similar in nature to existing businesses within the adjacent area (1 km radius) and is located within a business park which allows the proposed activity; therefore there is no major conflict with existing land use in the area.

8. Conclusion

Based on the information submitted in this document and as per the mitigation measures outlined, the writer recommends that the proposed operation should proceed as described in this report.

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July 1, 2013
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