

INTERIM SUMMARY
OF ISSUES AND RESPONSES

Relating to the Class 1 Air Quality Operating Approval for
McCain Foods Limited
Grand Falls Frozen Food Plant

Prepared by:
Authorizations Branch
Department of Environment and Local Government
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INTRODUCTION

As part of the Public Participation Process under the *Clean Air Act*, the Department of Environment and Local Government is required to prepare an "Interim Summary of Issues and Responses". This document marks the mid-way point of the public comment period and is available on the Internet Site or through any regional Environment office.

The Department's Project Management Team is responsible for summarizing the comments (including questions) made to the department by the public to date and for providing, where possible, responses to those comments. In addition to the Interim Summary Report of Issues and Responses, a draft Approval is also prepared and made available at the mid-way point of the public comment period.

Where applicable, the responses in the Interim Summary refer to conditions in the draft Approval. In this way, the public has the opportunity to view the Department's recommended action by the Approval Holder to address various concerns through the Approval itself. Other responses would outline how issues are, or can be addressed through other means, including administratively, by improving operating practices, or by using pollution prevention or pollution control techniques. There may also be responses that address issues, which may not be significant in terms of environmental protection or public health, but that are considered in the overall review of a facility's operational activities.

The public continues to have the opportunity to identify new issues as well as to comment on the Interim Summary Report and the draft Approval until the end of the public comment period on June 20, 2022.

Please note: *The Department encourages anyone who wishes to make comments to provide them in writing so that there is a definite record of the inquiries and issues being submitted under the Public Participation Process. While staff will endeavor to respond to telephone calls or other forms of inquiry, we encourage written comments so as to avoid the omission or misinterpretation of the information people wish to submit.*

ABOUT THE FACILITY

McCain Foods Limited operates a frozen food processing plant on Route 108, in St. Andre, New Brunswick. This plant has been in operation, originally as a French fry production plant, at the existing location since 1971. Cold storage was added to the Facility in 1973 and a processing line expansion was undertaken in 2020.

As required under the *Air Quality Regulation – Clean Air Act*, the McCain Foods Grand Falls Frozen food plant is considered a source and therefore, must apply for an Air Quality Approval to Operate from the New Brunswick Department of Environment. The facility is required to conduct its operations according to conditions outlined in the Air Quality Approval aimed at preventing unfavorable air quality conditions. Conditions of approvals can be wide-ranging and may, in some cases, include requirements such as:

- limitations on operational parameters;
- requirements for testing and monitoring of emissions from specific unit operations;
- requirements for testing and monitoring of the ambient air quality surrounding the facility;
- requirements to operate air pollution control equipment;

- limits on emissions that are approved to be released to the atmosphere;
- provisions for equipment upgrade and/or maintenance;
- requirements for environmental emergency and/or compliance reporting; and
- other conditions aimed at minimizing the facility's impact on the environment.

The Regulation provides for approvals to be issued by the Minister of Environment for a specified period, not to exceed five years.

For more detailed information on the McCain Foods Limited, Grand Falls Frozen Food Plant, please see the Facility Profile, available on the department's Public Information Access Internet Site or through any office of the Department. Information is also available by contacting McCain Foods Limited, Grand Falls Frozen Food Plant directly. (The contact information and Internet site address appear at the end of this Summary)

GENERAL INFORMATION ABOUT THE SUMMARY

This summary includes comments received up to March 16th, 2022 to allow sufficient time for the Department to consider the issues raised, formulate responses, as well as publish the information in both official languages. Comments received after this date will be included in the "Final Summary of Issues and Responses" which will be available following the public comment period, which ends on June 20, 2022.

It is important to note that while the Interim Summary reflects all relevant public comment received by the Department of Environment and Local Government, the names of specific individuals or groups who commented are not identified.

Any comments received or issues raised which are not directly related to air quality issues regarding this facility will not be included in the summary of issues and responses.

SUMMARY OF COMMENTS RECEIVED AND RESPONSES PROVIDED

As of March 16th, 2022, the following comments, questions and inquiries were received from the public by the Department regarding the McCain Foods Limited, Grand Falls Frozen Food Plant in Grand Falls or its current Air Quality Approval to Operate.

ISSUE: DESCRIPTION AND LOCATION OF SOURCE

Q1: There is concern regarding the potential release of ammonia to ambient air. The question was asked if this occurs currently?

Q2: Monthly inspections of the ammonia piping system are required by the conditions of the Approval. The question was asked, what were the results of these inspections over the last five (5) years and has there been a discharge of material to the environment, even during upset conditions, during this period?

RESPONSE

A1: The facility undertakes routine monitoring and inspections for the ammonia refrigeration system to ensure normal operations and mitigate leaks should they occur.

A2: Over the past 5 years, there has been a limited number of small ammonia leaks, which is typical of an industrial refrigeration system. Leaks discovered are identified, documented, and repaired, in a controlled and safe manner.

ISSUE: ENERGY SOURCES

Q3: Please provide the proportions of fuels used at the facility on a yearly basis, including natural gas and self-generated used oil.

Q4: It was stated that the Approval Holder should be burning only natural gas to avoid particulate matter emissions that may stem from other fuel types.

Q5: The question was asked, what contaminants are present in the self-generated used oil and what are they derived from?

RESPONSE

A3: The proportion of fuels used was 99% compressed natural gas (CNG) and less than 1% #2 Fuel Oil. The facility does not generate used oil.

A4: The facility burns CNG delivered by truck. In the event of a natural gas delivery delay, #2 Fuel Oil is used as a supplemental fuel.

A5: Used oil means oil that has become unsuitable for its original purpose because of the presence of impurities or the loss of its original properties. Self-generated used oil is used oil that has been generated while operating one's own business. An example would be used lubricating oils from machinery or equipment. Used oil may contain contaminants such as metals. McCain Foods has not burned any self-generated used oil at the Grand Falls facility in the past five years.

ISSUE: EXHAUST STACK

Q6: There is concern that emissions from the flare stack may affect the surrounding community. The question is asked if there is sufficient dispersion at the current stack height in the event of a cloud inversion?

RESPONSE

A6: The flare stack is an engineered system designed to burn off biogas generated at the site's wastewater treatment facility. Emissions from the flare stack are compliant with the Air Quality Approval to Operate for the McCain Foods facility.

ISSUE: FINE PARTICULATE

Q7: Please provide the yearly emissions of fine particulate matter (PM_{2.5}) from the facility

RESPONSE

A7: Emissions of fine particulate matter (PM_{2.5}) average 4.45 tonnes annually.

ISSUE: AIR POLLUTION CONTROL TECHNOLOGY

Q8: The question was asked, has the pollution control systems present at the facility operated constantly during the last five (5) years? Please specify any periods where the system was inoperable for more than one (1) day.

RESPONSE

A8: There have been no incidents associated with the facility's pollution control systems over the past five (5) years.

ISSUE: EMISSION LIMITS

Q9: There is concern that the existing limits on emissions are not clear enough and that maximum annual emission limits in tonnes per year should be used instead.

Q10: It was stated that existing emissions levels should not be acceptable. The question was asked if a condition requiring the preparation of an emissions reduction plan would be included in the new approval.

RESPONSE

A9: McCain Foods uses natural gas as the primary fuel at the facility, which results in very low emissions of sulphur dioxide (SO₂) and particulate matter (PM). Annual emissions of SO₂ and PM are in the range of 5 tonnes per year for each contaminant. This is well below the classification criteria for a Class 1B source stipulated in the New Brunswick *Air Quality Regulation*. As per the *Air Quality Regulation – Clean Air Act*, the thresholds for a Class 1B source are a maximum of 1000 tonnes per year for SO₂ and PM.

A10: Since converting the facility from mainly using #6 fuel oil to burning almost entirely natural gas as fuel, annual emissions of SO₂ have been reduced by more than 95% and emissions of PM have been reduced by approximately 90%. As such, no new conditions requiring an emission reduction plan will be added to the approval.

ISSUE: INSPECTIONS

Q11: Please provide the number of announced and unannounced inspections that occur annually.

RESPONSE

A11: No announced or unannounced inspections have occurred during the term of the current Approval to Operate, there have been no issues requiring a site visit.

ISSUE: SUMMARY OF COMPLAINTS & INCIDENTS

Q12: Please provide a summary of any complaints received by the Approval Holder as well as the department.

Q13: Please provide the number of environmental occurrence reports registered for the facility over the term of the previous approval.

RESPONSE

A12: No complaints have been submitted to the Grand Falls Regional Office, Central Office, or Approval Holder with regards to the facility during the last five years.

A13: There have not been any occurrence files opened for environmental issues over the last five (5) years.

ISSUE: ANNUAL REPORTS

Q14: Please provide all components of the Approval Holder's annual report as per condition 21.

RESPONSE

A14: The Department uses data collected from the annual air quality reports to help verify the facility is operating in compliance with the *Air Quality Regulation*. Requests to view entire reports can be made under the Right to Information and Protection of Privacy Act. The request form is available at the following link: <https://www.pxw1.snb.ca/snb7001/e/1000/CSS-FOL-SNB-77-0002E.pdf>

ISSUE: ASBESTOS & LEAD

Q15: There is concern that asbestos may be present in the pipe wrappings present within the facility, as well as lead paint. The question was asked, if the Approval Holder is aware of such materials being present, and if so, what has been done in terms of assessment and remediation.

RESPONSE

A15: The engineering team at McCain Foods has a process for assessing, managing, and mitigating any found presence of asbestos and/or lead paint.

Any remediation steps for asbestos and lead paint are compliant with regulatory guidelines and best engineering practices.

ISSUE: PROXIMITY TO POPULATION AREAS

Q16: The question was asked, how close is the Approval Holder's facility to populated areas.

RESPONSE

A16: The nearest populated area is the Town of Grand Falls, which is approximately 2,000 meters from the McCain Foods facility.

CONTACT INFORMATION

For information on the *Clean Air Act*, the Public Participation Process, the Facility Profile of the McCains plant, the Interim Summary of Issues and Responses, and the draft Approval, visit the Department's website at:

www.gnb.ca/environment

For further information on the operation of the McCain Foods Limited, Grand Falls Frozen Food Plant, please contact:

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