Appendix C Environmental Compliance Audit, Conestoga-Rovers and Associates, 2006



ENVIRONMENTAL COMPLIANCE AUDIT

GYPSUM PLANT MCADAM, NEW BRUNSWICK

Prepared For: BPB Canada Inc.



ENVIRONMENTAL COMPLIANCE AUDIT

BPB CANADA INC.

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1.0 <u>INTRODUCTION</u>

Conestoga-Rovers & Associates (CRA) was retained by BPB Canada Inc. (BPB) to conduct an Environmental Compliance Audit of the Gypsum Wallboard Plant in McAdam, New Brunswick (Site). A Site location map is presented as Figure 1 and a property map is presented as Figure 2.

The audit included a review of the requirements in the Approval to Operate I-3408 (Appendix A), a review of the Environmental Management System (EMS), applicable federal, provincial and municipal regulations and included a visit to the Site to review the storage, handling and disposal methods currently in use at the BPB facility. The audit findings and associated recommendations are presented in Sections 4.1 to 4.11.

2.0 <u>SITE DESCRIPTION</u>

The subject property is a private gypsum wallboard manufacturing facility owned by BPB Canada Inc. and is located at 57 Quality Way, in McAdam, New Brunswick. The Site is approximately 23 hectares (ha) in size and is a mixture of pervious and impervious surfaces. It is bound by a gravel road to the north, a Canadian Pacific (CP) Railway line to the west, and a peripheral drainage ditch along the east and south (Figure 3).

The northwestern portion of the Site is generally not in use for plant operations and is largely covered in trees and grasses. Two fire ponds are located in the centre of the property, used for emergency purposes only and a drainage swale runs east to west, across the centre of the Site, north of fire ponds.

A gypsum rock supply pile is located in the northeast area of the Site over an area of approximately 2 ha and a scrap wallboard recycle pile covers an area of approximately 1.3 ha at the southwest corner of the Site. The facility buildings are located in the southern portion of the Site.

The primary features of the Site related to operations are described below.

- *Gypsum Rock Stockpile* This is the storage pile for raw gypsum rock delivered to the Site. The material serves as the plant feed rock and is transported to the primary crusher.
- *Primary Crusher* This is used to crush the raw feed rock to a diameter of less than ³/₄ inches (19 mm).
- *Rock Dryer* This is a rotary kiln that is used to evaporate excess free moisture from the crushed feed rock.
- *Calcine Processing Area* In this area, the dried gypsum is further reduced in size to 92% passing 100-mesh screens in a ball mill, and then calcined to stucco in a calcine burner.
- *Wallboard Fabrication Line* Dry and liquid ingredients are mixed following the calcine processing. The slurry is placed between sheets of paper, and the wallboard is then expelled, set and dried.

- *Waste Wallboard Recycle Pile* Damaged and waste wallboard is stockpiled in this area for recycling into the manufacture process.
- *Peripheral Drainage Ditch* This ditch surrounds the east and south boundaries of the Site and receives process wastewater from the facility and overland Site runoff from the eastern and southern portions of the Site. The ditch feeds into a small swamp area at the west end of the property, adjacent to the wallboard recycle pile. The swamp area then drains west through a culvert below a rail line.

3.0 APPLICABLE FEDERAL, PROVINCIAL AND MUNICIPAL REGULATIONS

3.1 <u>AIR EMISSIONS</u>

New Brunswick Clean Air Act New Brunswick Clean Air Regulation (97-133) Approval to Operate I-3408

3.2 WATER MANAGEMENT

New Brunswick Clean Environment Act Water Quality Regulation (82-126) New Brunswick Health Act General Regulation (88-200) New Brunswick Clean Water Act New Brunswick Wellfield Protected Area Designation Order (2000-47) Approval to Operate I-3408

3.3 SOLID AND HAZARDOUS WASTE

New Brunswick Clean Environment Act Petroleum Product Storage and handling Regulation (87-97) Water Quality Regulation (82-126) Municipal Sewer Use By-law No. 29 New Brunswick Regional Solid Waste Commissions Regulation (96-11) New Brunswick Clean Air Act Air Quality Regulation (97-133) Ozone Depleting Substances Regulation (97-132) New Brunswick Transportation of Dangerous Goods Act New Brunswick Transportation of Dangerous Goods Regulation (89-67) Solid Waste Commission Certificate of Approval SL4-R2000 Approval to Operate I-3408

3.4 <u>MATERIAL STORAGE AND MANAGEMENT</u>

New Brunswick Occupational Health and Safety Act Workplace Hazardous Materials Information System Regulation (88-121) General Regulation (91-191) New Brunswick Clean Environment Act New Brunswick Water Quality Regulation (82-126)

3.5 <u>POLYCHLORINATED BIPHENYLS MATERIALS/EQUIPMENT</u>

Not Applicable

3.6 <u>ASBESTOS CONTAINING MATERIALS</u>

Occupational Health and Safety Act

Code of Practice for Working with Material Containing Asbestos Regulation (92-106)

New Brunswick Transportation of Dangerous Goods Act

New Brunswick Transportation of Dangerous Goods Regulation (89-67)

3.7 <u>PETROLEUM PRODUCTS</u>

New Brunswick Clean Environment Act New Brunswick Water Quality Regulation (82-126) Petroleum Products Storage and Handling Regulation (87-97) New Brunswick Clean Water Act New Brunswick Wellfield Protected Area Designation Order (2000-47)

3.8 <u>PESTICIDES / HERBICIDES</u>

New Brunswick Pesticides Control Act General Regulation (96-126)

3.9 OZONE DEPLETING SUBSTANCES

New Brunswick Clean Air Act Ozone Depleting Substances Regulation (97-132)

3.10 <u>LEAD BASED PAINT</u>

Not Applicable

3.11 RADIOACTIVE MATERIALS

Not Applicable

4.0 <u>AUDIT FINDINGS</u>

The Site EMS documentation for the BPB McAdam facility was reviewed. The EMS provides a system and instructions for identifying and documenting environmental aspects of the company's activities, products and services and is in compliance with the international standards of ISO 14001. This system includes evaluating the significance of environmental interactions for all of the facilities operational procedures and assigning responsibilities, usually to a multidisciplinary team, with the aim of reducing any potential impact.

A Site visit was completed by Ms. Heather MacDonald, M.Sc., P.Geo., of CRA on March 15, 2006. Observations made during the Site visit are described in the following sections.

4.1 <u>AIR EMISSIONS</u>

No regulatory compliance issues were identified regarding air emissions at the facility. The Rock Dryer Exhaust Stack, the Calcine Mill Exhaust Stack and two Dryer Oven Exhaust Stacks are tested (for particulate matter (PM), sulphur dioxide (SO2), nitrogen oxides (NO) and carbon monoxide (CO)) by a qualified firm on a regular basis. PM within the plant buildings is accumulated through an air vacuum collection system and is discharged into a collection hopper. The concentrated dust is then used in the rock recycle program.

It is noted that the facility reports to National Pollutant Release Inventory (NPRI) for four substances released to the air: oxides of nitrogen (expressed as NO2) (CAS No. 11104-93-1); PM (CAS No. NA-M08); PM <=2.5 microns (CAS No. M10); and sulphur dioxide (7446-09-5). NPRI information reported for 2004 is attached in Appendix B.

Diesel is supplied to the Site by Imperial Oil Limited and Bunker C is supplied to the Site by Irving Oil. Imperial Oil Limited Technical Information Department states that all diesel fuel oil distributed in the province of New Brunswick contains a sulphur content of less than 0.5% by weight; this percentage of sulphur is within the provincial requirements. Irving Oil states that their Bunker C product is low in sulphur, asphaltenes and NOxs (http://www.irvingoil.com/pr_business/pr_indprods/).

4.2 <u>WATER MANAGEMENT</u>

Potable water is supplied to the facility by the municipal system of the Village of McAdam. The source of the municipal supply is groundwater from wells located approximately 2 km to the southeast of the Site as indicated by the New Brunswick Clean Water Act - New Brunswick Wellfield Protected Area Designation Order (2000-47). The gypsum plant is approximately 1 km northwest of Zone C of the wellfield protected areas for the Village of McAdam, as shown in Appendix C.

Four groundwater monitoring wells are located on the Site (Well #1 to Well #4), which have been sampled on a bi-annual basis, along with three surface water locations (upstream, downstream 30 metres from the Site and downstream 100 metres from the Site) since 1995. The water samples were analyzed for calcium, sulphate, sulphide, total suspended solids (TSS), and pH. Total petroleum hydrocarbon analyses was added in 2005.

One item of potential regulatory compliance observed during the Site inspection was the overland runoff drainage of water and fine particulate matter, originating from the gypsum rock stockpile and calcine processing area, and discharging into the peripheral drainage ditch.

It is noted that BPB has been requested to address water quality issues at the Site by the New Brunswick Department of Environment (NBENV) (formerly the New Brunswick Department of Environment and Local Government (NBDELG)), in accordance with their current Approval to Operate I-3408, valid until August 31, 2007. CRA was retained by BPB to conduct a feasibility study regarding surface water at the Site (Site Surface Water Management Analysis report dated December 2005). The report was prepared to provide Site surface water characteristics, feasibility information and to develop a conceptual plan for drainage and treatment works to be used in discussions with review agencies to obtain ultimate Site plan approval for proposed works. The main goal is to ensure that discharge from the Site does not result in adverse environmental impacts to off-Site surface waters, sediments, and/or biota. Recommendations include the control and/or treatment of surface runoff to prevent adverse impacts to receiving waters.

4.3 <u>SOLID AND HAZARDOUS WASTE</u>

There were no solid and/or hazardous waste regulatory compliance issues identified at the Site. Solid wastes generated at the Site are stored in dumpsters and are collected weekly by MDI, a local collection contractor, for transport and disposal at the Hemlock Knoll Sanitary Landfill in Lawrence Station, NB. The plant maintains a Solid Waste Commission Certificate of Approval SL4-R2000.

Wooden pallets are stacked west of the main building, in the area of the scrap metal hopper. The pallets are stacked 15- high, and the companies that bring the pallets to the Site are called to pick up and remove their pallets. Waste metal, waste oil and drums are collected on an as-required basis by a local contractor located in St. Stephen, NB.

Hazardous waste is stored in metal drums in a specific Haz-Mat area (south of the calcine area and east of the main building), identified with signs and labels, over secondary containment until picked up by a certified contractor on an as-required basis.

Currently, a lunchroom beverage container recycling program is in place at the plant. The South West Solid Waste Commission recycling program accepts paper, cardboard and #1 and #2 plastic. As a best management practice and in accordance with the facility EMS, it is recommended that the current recycling program be expanded to include paper products and selected plastics. Paper product recycling should also include the implementation of desk-side paper containers as soon as economically feasible.

Table 1 outlines all waste related issues at the Site.

4.4 MATERIAL STORAGE AND MANAGEMENT

There were no regulatory compliance issues related to material storage and management identified during the Site visit. Material Safety Data Sheets (MSDS) for materials used on-Site that are controlled by the Workplace Hazardous Materials Information System (WHMIS) were provided in accessible locations and materials are identified by signs and labels. All employees are WHMIS-trained. Chemicals are efficiently stored in product-specific containers in designated locations of the plant, either on wooden pallets or on metal and wood shelving designed for that purpose.

Material storage and management issues are also presented in Table 1.

4.5 <u>POLYCHLORINATED BIPHENYLS MATERIALS/EQUIPMENT</u>

No compliance issues were identified with regard to polychlorinated biphenyls (PCBs). Three pole-mounted transformers (property of NB Power) were observed northwest of the main building. There is no PCB storage area located on-Site.

4.6 <u>ASBESTOS CONTAINING MATERIALS</u>

There were no regulatory compliance issues identified with respect to asbestos containing materials (ACM) however, it is recommended that a full ACM inspection and management plan be developed for the facility.

4.7 <u>PETROLEUM PRODUCTS</u>

All aboveground storage tanks (ASTs) had secondary containment and appropriate protection from vehicular traffic is provided (note – the second item is not a regulatory requirement, but is considered to be a best management practice). The AST located outside (north of the calcine processing building) sits overtop of a concrete catch basin within an aluminum-sided shed. A minor spill of Bunker C fuel was observed adjacent to the AST in the calcine processing area however; the spill was limited to within the secondary containment and had been treated with absorbent pads. It is recommended that the remaining spilled Bunker C be cleaned and the absorbent pads taken to an approved disposal facility.

One regulatory compliance issue was identified during the Site inspection regarding petroleum products. In accordance with the Clean Environment Act (Regulation 87-97; Petroleum Products Storage and Handling Regulation), the AST located outside should have its contents and maximum capacity clearly marked on three sides. The tanks appeared to be in good condition however, it is recommended that all of the ASTs be given a coating of rust-resistant material compatible with the tank as soon as economically feasible.

The NBENV was contacted regarding file information pertaining to the petroleum storage tanks located at the Site. The NBENV correspondence is attached in Appendix D.

4.8 <u>PESTICIDES / HERBICIDES</u>

There were no regulatory compliance issues identified regarding pesticides/herbicides as the storage or use of pesticides/herbicides was not identified on the property.

4.9 OZONE DEPLETING SUBSTANCES

There were no regulatory compliance issues identified on the property. Equipment containing ozone depleting substances (ODS) is required to be serviced by a licensed refrigeration contractor (if needed) or disposed of in accordance with the New Brunswick Clean Environment Act – Ozone Depleting Substances Regulations (when required).

4.10 <u>LEAD BASED PAINT</u>

Lead based paint was common in buildings constructed in the 1940-60s. In 1976, the federal government limited the amount of lead in interior paint to 0.5% by weight. Given that the buildings were reportedly constructed in 1972, lead based paint may be present in paint on this property. Paint samples were not collected as part of this study.

The remedial option for lead based paint involves scraping loose and flaking paint, repainting the surfaces with lead free paint and collecting paint chips for off-Site disposal at an approved location. All future building renovation work including scraping paint / repainting should be conducted in accordance with a Site-specific health and safety plan that considers the presence of lead based paint.

4.11 RADIOACTIVE MATERIALS

Standard smoke detectors may contain low level radioactive materials and should be properly disposed of as required. No other sources of radioactive materials were observed at the Site.

5.0 <u>CONCLUSIONS / RECOMMENDATIONS</u>

A potential regulatory issue was identified regarding overland stormwater runoff into the peripheral drainage ditch in the area of the main gypsum stockpile and calcine processing area. Stormwater management recommendations were provided to the plant in the CRA Site Surface Water Management Analysis report (dated December 2005). The recommendations include controlling and/or treatment of surface runoff to prevent adverse impacts to receiving waters.

One regulatory compliance issue was identified during the Site inspection regarding petroleum product storage. In accordance with the Clean Environment Act (Regulation 87-97; Petroleum Products Storage and Handling Regulation), the AST located outside (north of the calcine processing building) should have its contents and maximum capacity clearly marked on three sides. The tanks at the Site appeared to be in good condition however, it is recommended that all of the ASTs be given a coating of rust-resistant material compatible with the tank as soon as economically feasible.

As a best management practice and in accordance with the facility EMS, it is recommended that the current lunchroom beverage container recycling program at the facility be expanded to include paper products and selected plastics accepted by the municipality. Paper product recycling should include the implementation of desk-side paper containers as soon as economically feasible.

It is recommended that an ACM inspection and management plan be developed for the facility. In addition, any future building renovation work involving scraping paint/repainting should include sampling for lead content.

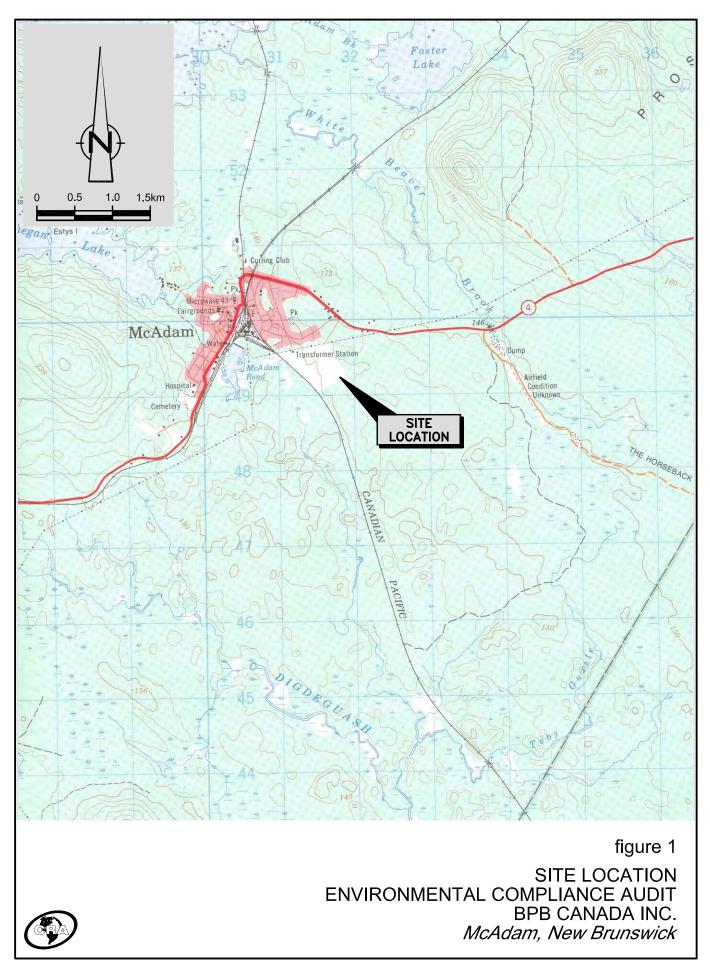
Best management practices should also include the proper disposal of equipment containing ODS, equipment containing radioactive substances (smoke detectors) and mercury containing substances (thermostats), when their use on-Site is no longer required.

All of which is respectfully submitted, CONESTOGA-ROVERS & ASSOCIATES

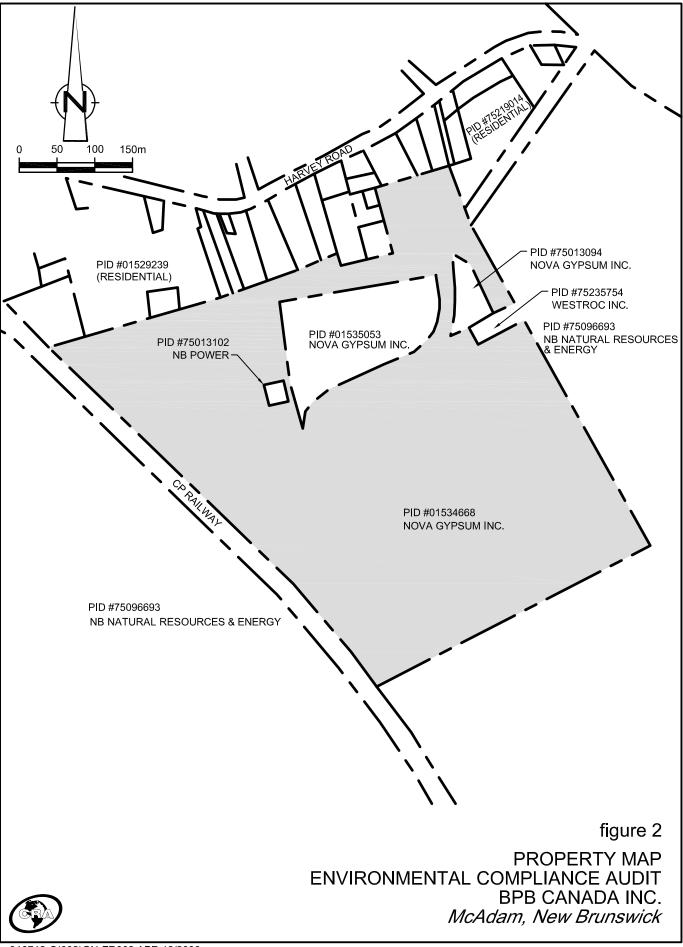
Heather MacDonald, M.Sc., P.Geo.

Christine Floude

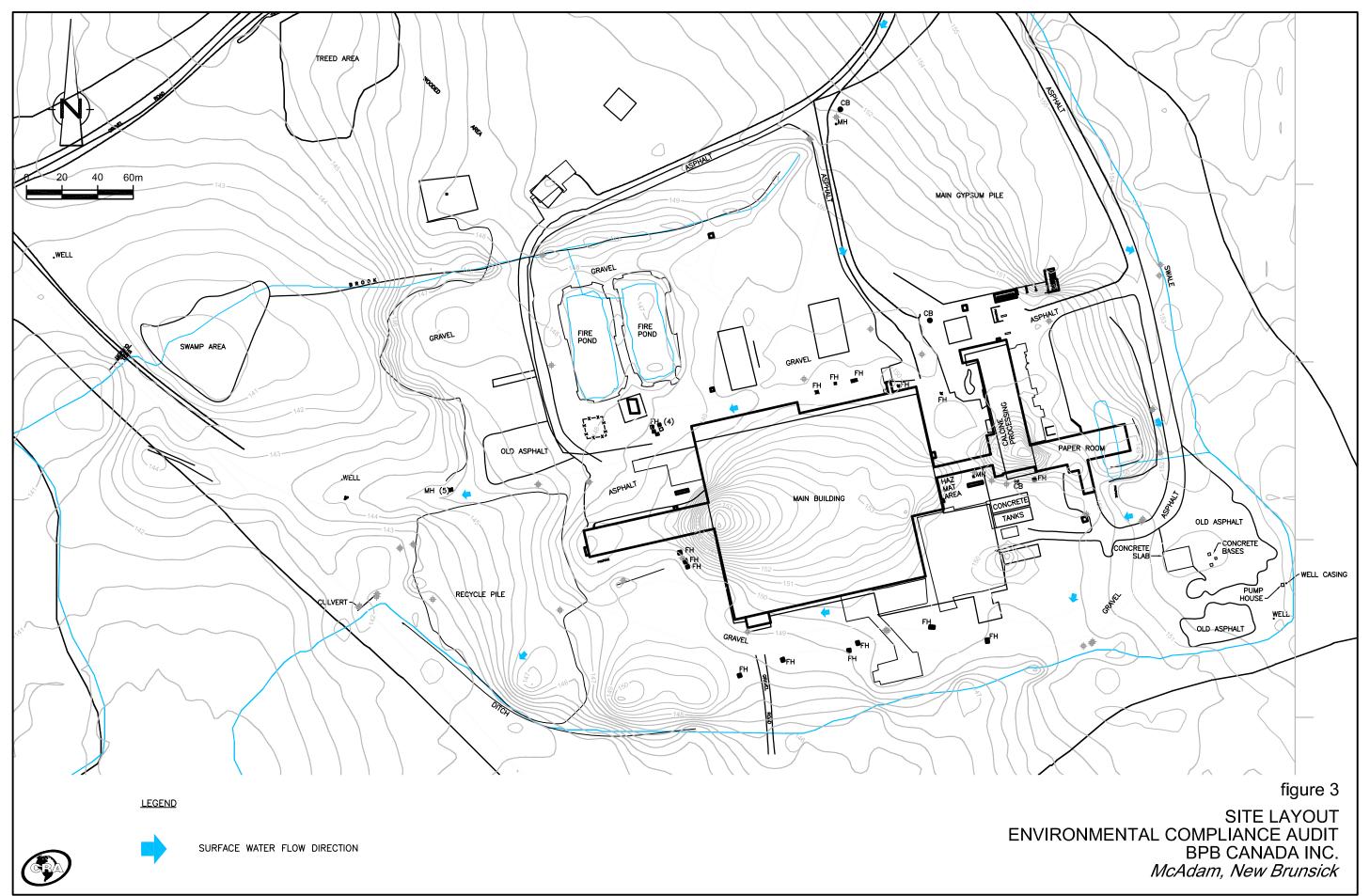
Christine Plourde, P.Eng.



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TABLE 1 APPLICABLE ENVIRONMENTAL LEGAL/REGULATORY REQUIREMENTS - WASTE ASPECTS

BPB Canada Inc., Gypsum Wallboard Plant, McAdam, NB

Area	Waste Item/Activity	Aspect		Legal/Regulatory Requirements	Control/Mitigation
ттей		nopeer	Act	Regulation	Controy Wittigution
	Diesel Fuel Combustion	1	CAA	Air Quality Regulation (97-133) - Certificate of Approval I-1457	Calculated emission
Rock Hill	Diesel Fuel Storage and Handling	6	CEA	Petroleum Product Storage and Handling Regulation (87-97) & Water Quality Regulation (82-126)	Cement spill containment (catch basin); spill kit and MSDS present
	Gypsum rock pile storage	6	CEA	Water Quality Regulation (82-126)	Pile confined to specific location
	Bunker C fuel Combustion	1	CAA	Air Quality Regulation (97-133) - Certificate of Approval I-1457	Calculated emission
	Bunker C fuel Storage and Handling	6	CEA	Petroleum Product Storage and Handling Regulation (87-97) & Water Quality Regulation (82-126)	Cement secondary containment; absorbent pads/spill kit
	Oil dry Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Used absorbent pads stored in specific waste storage drums until pick-up by certified contractor
	Starch - bag - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Bags are recycled until end of use, then disposed of in garbage
Calcine	China clay - bag - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Bags are recycled until end of use, then disposed of in garbage
	Potassium sulphate - bag - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Bags are recycled until end of use, then disposed of in garbage
	Edge paste - glue - Disposal	3	CEA/TDGA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations (if hazardous)	Containers are stored outside in specific locations and picked up as required by contractor
	Gypsum rock storage	6	CEA	Water Quality Regulation (82-126)	Rock storage confined to specific location; Site Surface Water Management Analysis initiated
	Bunker C fuel additive - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Not used regularly; when in use it is mixed in the supply truck

Aspects:

1 - Air Emissions

2 - Solid Waste Disposal

3 - Hazardous Waste Disposal

4 - Wastewater Disposal

5 - Waste Petroleum Liquid

6 - Storage and Handling

Note:

CAA - Clean Air Act (NB)

CEA - Clean Environment Act (NB)

CWA - Clean Water Act (NB)

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TABLE 1 APPLICABLE ENVIRONMENTAL LEGAL/REGULATORY REQUIREMENTS - WASTE ASPECTS

BPB Canada Inc., Gypsum Wallboard Plant, McAdam, NB

Area	Waste Item/Activity	Aspect		Legal/Regulatory Requirements	Control/Mitigation
тей	wuste ttent/Actionly	impeer	Act	Regulation	Controquinitgation
	Disal - liquid - Disposal	4	CEA	Water Quality Regulation (82-126) - Municipal Sewer Use By-law No. 29	Stored in ASTs with cement containment; MSDS and spill kits present
	Retarder - liquid - Disposal	3	CEA/TDGA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Stored in ASTs with cement containment; MSDS and spill kits present
Calcine	Micro silica - bag - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Bags are recycled until end of use, then disposed of in garbage
	Water vapour emissions	1	N/A	N/A	N/A
	Sulphur Emissions	1	CAA	Air Quality Regulation (97-133) - Certificate of Approval I-1457	Calculated emission
	Gypsum dust emissions	1	CAA	Air Quality Regulation (97-133) - Certificate of Approval I-1457	Preventative maintenance schedule and particulate matter emissions calculated
	Paper - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Durasar - bag - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Product not used anymore
Paper Room	Dextrose - bag - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Boric acid - bag - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Chopped fiberglass - bag - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage

Aspects:

1 - Air Emissions

2 - Solid Waste Disposal

3 - Hazardous Waste Disposal

4 - Wastewater Disposal

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TABLE 1 APPLICABLE ENVIRONMENTAL LEGAL/REGULATORY REQUIREMENTS - WASTE ASPECTS

BPB Canada Inc., Gypsum Wallboard Plant, McAdam, NB

Area	Waste Item/Activity	Aspect		Legal/Regulatory Requirements	Control/Mitigation
21764		Impett	Act	Regulation	
	Water based Ink - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Cardboard - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
Paper Room	Waste Paper - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Paper fiber cores - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Polyethylene shrink wrap - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Disal - liquid - Disposal	4	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457 & Municipal Sewer Use By-law No. 29	Stored in ASTs; drainage ditch; spill kits and MSDS present
	Emulsion - liquid - Disposal	4	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457 & Municipal Sewer Use By-law No. 29	Stored in ASTs; drainage ditch; spill kits and MSDS present
Mixer Area	Retarder - liquid - Disposal	3	CEA/TDGA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000 & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Stored in ASTs; drainage ditch; spill kits and MSDS present
	Fresh water - Disposal	4	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457 & Municipal Sewer Use By-law No. 29	Drainage ditch; controlled disposal
	Fiberglass mixed with water - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Stored in containers; removed by contractor

Aspects:

1 - Air Emissions

2 - Solid Waste Disposal

3 - Hazardous Waste Disposal

4 - Wastewater Disposal

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TABLE 1 APPLICABLE ENVIRONMENTAL LEGAL/REGULATORY REQUIREMENTS - WASTE ASPECTS

BPB Canada Inc., Gypsum Wallboard Plant, McAdam, NB

Area	Waste Item/Activity	Aspect	t Legal/Regulatory Requirements		Control/Mitigation
11764			Act	Regulation	Controquinitization
Mixer Area	Mixed gypsum stucco - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Rock recycle program (taken to dumpster by wheelbarrow; loader takes to recycle pile)
Knife Area	Knife blades - metal - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Stored in metal container and taken to scrap metal hopper
Nille Alea	Test boards - gypsum board - Disposal	2	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457	Rock recycle program
	Test boards - gypsum board - Disposal	2	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457	Rock recycle program
	Diesel Fuel #2 - combustion	1	CAA	Air Quality Regulation (97-133) - Certificate of Approval I-1457	Calculated emission
Takeoff Area	Diesel Fuel #2 - storage and handling	6	CEA	Petroleum Product Storage and Handling Regulation (87-97) & Water Quality Regulation (82-126)	Cement secondary containment; spill kits and MSDS present
	Evaporated water emissions	1	N/A	N/A	N/A
	Sulphur emissions	1	CAA	Air Quality Regulation (97-133) - Certificate of Approval I-1457	Calculated emission
	Stack emissions	1	САА	Air Quality Regulation (97-133) - Certificate of Approval I-1457	Calculated emission
	Test boards - gypsum board - Disposal	2	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457	Rock recycle program
Bundler Area	Labeling end tape - paper - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
Recycle Pile	Waste board - gypsum board - Disposal	2	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457	Rock storage confined to specific location; Site Surface Water Management Analysis initiated
Maintenance	Oil - Storage and handling	6	CEA	Petroleum Product Storage and Handling Regulation (87-97) & Water Quality Regulation (82-126)	Stored in waste oil drums
	Waste Oil -Disposal	5	CEA	Water Quality Regulation (82-126)	Contractor pick-up

Aspects:

1 - Air Emissions

2 - Solid Waste Disposal

3 - Hazardous Waste Disposal

4 - Wastewater Disposal

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6 - Storage and Handling

Note:

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BPB Canada Inc., Gypsum Wallboard Plant, McAdam, NB

Area	Waste Item/Activity	Aspect		Legal/Regulatory Requirements	Control/Mitigation
21764	wuste neng/netiong	Inspece	Act	Regulation	Controy Mitigation
	Solvents/degreasers - Disposal	3	CEA/TDGA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Waste storage containers picked up by contractor
	Metal - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Waste storage containers picked up by contractor
Maintenance	Wood - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Welding rods - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Scrap metal hopper and/or regular garbage
	Parts cleaner solvent - Disposal	3	CEA/TDGA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Recycled and stored in designated waste storage containers
	Wallboard - gypsum board - Disposal	2	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457	Rock recycle program
	Polyethylene shrink wrap - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Wood - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
S. Warehouse	Metal scraps - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Scrap metal hopper
	Cardboard - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Wallboard - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Rock recycle program
	Damaged products - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Back to supplier
	Plastic - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage

Aspects:

1 - Air Emissions

2 - Solid Waste Disposal

3 - Hazardous Waste Disposal

4 - Wastewater Disposal

5 - Waste Petroleum Liquid

6 - Storage and Handling

Note:

CAA - Clean Air Act (NB)

CEA - Clean Environment Act (NB)

CWA - Clean Water Act (NB)

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TABLE 1 APPLICABLE ENVIRONMENTAL LEGAL/REGULATORY REQUIREMENTS - WASTE ASPECTS

BPB Canada Inc., Gypsum Wallboard Plant, McAdam, NB

Area	Waste Item/Activity	Aspect		Legal/Regulatory Requirements	Control/Mitigation
Ліей	Waste HenryActionly	Aspeci	Act	Regulation	Controy Miliguilon
	Wallboard - gypsum board - Disposal	2	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457	Rock recycle program
	Polyethylene shrink wrap - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Wood - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
N. Warehouse	Metal straps for securing loads - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Scrap metal hopper
	Cardboard - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Polyethylene train bags - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Shipped with product and/or regular garbage
	Styrofoam - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Reused until end of life; regular garbage
	Organic solvents - Disposal	3	CEA/TDGA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Specific waste containers
QC Lab	Sample stucco - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Rock recycle program
QC Lab	Test board - gypsum board - Disposal	2	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457	Rock recycle program
	Paper - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
Office	Paper - Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage

Aspects:

1 - Air Emissions

2 - Solid Waste Disposal

3 - Hazardous Waste Disposal

4 - Wastewater Disposal

5 - Waste Petroleum Liquid

6 - Storage and Handling

Note:

CAA - Clean Air Act (NB)

CEA - Clean Environment Act (NB)

CWA - Clean Water Act (NB)

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TABLE 1 APPLICABLE ENVIRONMENTAL LEGAL/REGULATORY REQUIREMENTS - WASTE ASPECTS

BPB Canada Inc., Gypsum Wallboard Plant, McAdam, NB

Area	Waste Item/Activity	Aspect	Legal/Regulatory Requirements		Control/Mitigation
11/04	Wiste Henry Henry	nspeer	Act	Regulation	Controy Milligution
	Oils - Storage and handling*	6	CEA	Petroleum Product Storage and Handling Regulation (87-97) & Water Quality Regulation (82-126)	Parts storage room; spill kits in all areas
Purchasing	Solvents/degreasers - Storage and handling*	6	CEA/TDGA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Flame proof storage cabinet
	Welding rods - Storage and handling	6	N/A	N/A	N/A
	Parts cleaner solvent - Storage and handling*	6	CEA/TDGA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Parts storage room; spill kits in all areas
	Fluorescent light bulb -Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Regular garbage
	Rags (flash point >62 Degrees C) -Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Specific storage can
	Rags (with flash point <62 Degrees C) -Disposal	3	CEA/TDGA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Specific storage can
Miscellaneous	Antifreeze	3	CEA/TDGA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Waste drums in maintenance area
	Cans, bottles -Disposal	2	CEA	Water Quality Regulation (82-126) - Solid Waste Commission Certificate of Approval SL4-R2000	Lunchroom recycle program
	Water -Disposal	4	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457 & Municipal Sewer Use By-law No. 29	Municipal sewage
	Domestic sewage - Disposal	4	CEA	Water Quality Regulation (82-126) - Certificate of Approval I-1457 & Municipal Sewer Use By-law No. 29	Municipal sewage

Aspects:

1 - Air Emissions

2 - Solid Waste Disposal

3 - Hazardous Waste Disposal

4 - Wastewater Disposal

5 - Waste Petroleum Liquid

6 - Storage and Handling

Note:

CAA - Clean Air Act (NB)

CEA - Clean Environment Act (NB)

CWA - Clean Water Act (NB)

TDGA - Transportation of Dangerous Goods Act (NB & Canada)

* - Applies if material is spilled

TABLE 1 APPLICABLE ENVIRONMENTAL LEGAL/REGULATORY REQUIREMENTS - WASTE ASPECTS

BPB Canada Inc., Gypsum Wallboard Plant, McAdam, NB

Area	Waste Item/Activity	Aspect		Legal/Regulatory Requirements	Control/Mitigation
21764			Act	Regulation	
	Hydro electricity	N/A	N/A	N/A	Preventative maintenance
	Air conditioning - releases	1	CAA	Ozone Depleting Substances Regulation (97-132)	Preventative maintenance
Miscellaneous	Propane / propane filling stations	1	N/A	Certificate of Approval I-1457	Preventative maintenance
	Hazardous Waste Disposal	1	CEA	Water Quality Regulation (82-126) & Federal and Provincial (89-67) Transportation of Dangerous Goods Regulations	Preventative maintenance
Mahila Equipment	Propane forklifts - emissions	1	N/A	Certificate of Approval I-1457	Preventative maintenance
Mobile Equipment	Electric forklifts	N/A	N/A	N/A	Preventative maintenance
Burn Pile	Waste wood and pallets combustion	1	CAA	Air Quality Regulation (97-133) (burn permit)	Not practiced

Aspects:

1 - Air Emissions

2 - Solid Waste Disposal

3 - Hazardous Waste Disposal

4 - Wastewater Disposal

5 - Waste Petroleum Liquid

6 - Storage and Handling

Note:

CAA - Clean Air Act (NB) CEA - Clean Environment Act (NB) CWA - Clean Water Act (NB) TDGA - Transportation of Dangerous Goods Act (NB & Canada)

* - Applies if material is spilled

APPENDIX A

APPROVAL TO OPERATE I-3408

New Brunswick

APPROVAL TO OPERATE

I-3408

Pursuant to paragraph 5 (3) (a) of the Air Quality Regulation - Clean Air Act and paragraph 8(1) of the Water Quality Regulation - Clean Environment Act, this Approval to Operate is hereby issued to:

Westroc Inc. for the operation of the McAdam Gypsum Wallboard Plant

Description of Source:

Source Classification:

Parcel Identifier:

Mailing Address:

Conditions of Approval:

Air Quality Regulation Class 2 **Fees for Industrial Approvals**

Gypsum Rock Stockpile, Primary Crusher, Rock Dryer, Calcine Mill, Wallboard Fabrication Line

Class 4

01534668

P.O. Box 390 McAdam, NB E0H 1K0

Regulation - Clean Water Act

See attached Schedule "A" of this Approval

I-1457

September 01, 2002

August 31, 2007

Recommended by: Environmental Management Division 1 Å Å

Issued by:

Valid From:

Valid To:

aug zo/oz

Minister of the Environment and Local Government

Supersedes Approval:

09:20

00/24/00

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SCHEDULE "A"

A. DESCRIPTION AND LOCATION OF SOURCE

Westroc Inc. operates a Gypsum Wallboard Plant that has an annual production capacity of 23 million square metres of Gypsum Wallboard. The plant is located in the Village of McAdam, New Brunswick.

There exists *potential* environmental impacts to the atmospheric environment from: i) upset operating conditions; ii) the release of particulate matter from fuel oil combustion, crushing and drying processes; iii) the release of sulphur dioxide, nitrogen oxides, and carbon monoxide from fuel oil combustion processes; iv) the release of fugitive particulate matter emissions from the on-site stock piles, materials handling, crushing and site access roads; and v) the release of noise from the general operation of the facility.

There exist *potential* environmental impacts to the soil, groundwater, and surface water environments from: i) the discharges, spills and/or leaks of wastewater, petroleum products, and chemicals.

The operation of the Westroc Gypsum Wallboard Plant in the Village of McAdam, County of York, and Province of New Brunswick, and identified by Parcel Identifier (PID) 01534668 is hereby approved subject to the following:

B. DEFINITIONS

- 1. "Approval Holder" means Westroc Inc.
- 2. "Minister" means the Minister of the Department of the Environment and Local Government and includes any person designated to act on the Minister's behalf.
- 3. "Department" means the New Brunswick Department of the Environment and Local Government.
- 4. "Director" means the Director of the Approvals Branch of the Department of the Environment and Local Government and includes any person designated to act on the Director's behalf.
- 5. "Inspector" means an Inspector designated under the Clean Air Act, the Clean Environment Act, or the Clean Water Act.
- 6. "Facility" means the property, buildings, equipment, and all contiguous property in the title of the Approval Holder at that location, including but not limited to:

- A. GYPSUM ROCK STOCKPILE is the area where the Gypsum Rock, which is the plant feed rock, is stored prior to transportation to the Primary Crusher. The stockpile is considered a potential source of fugitive particulate matter.
- B. PRIMARY CRUSHER is used to crush the feed rock to a reduced size less than 1.9 cm (0.75 in) in diameter. The primary crusher is considered a potential source of fugitive particulate matter.
- C. ROCK DRYER is a rotary kiln dryer unit used to evaporate excess free moisture from the rock. The kiln utilises No. 6 Fuel Oil as the fuel source and is equipped with an exhaust stack that is 0.9 m (3.95 ft) in diameter and 7 m (22.9 ft) above adjacent ground level. The dryer exhaust stack is considered a release point for process gas and a point source of particulate matter (PM), sulphur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO) emissions to the atmospheric environment.
- D. CALCINE MILL is where dried gypsum from the Rock Dryer is fed for further size reduction to 92% passing 100-mesh screens in a Ball Mill, and then calcined to stucco in a Calcine Burner. The burner utilises No. 6 Fuel Oil and is equipped with an exhaust stack that is 0.6 m (1.97 ft) in diameter and 6.5 m (21.3 ft) above adjacent ground level. The mill exhaust stack is considered a release point for process gas and a point source of particulate matter (PM), sulphur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO) emissions to the atmospheric environment.
- E. WALLBOARD FABRICATION LINE is situated after the stucco production in the Calcine Mill. All the dry and liquid ingredients are added, mixed, and placed between sheets of paper; the wallboard is extruded to the desired form and set before it is fed into a drying oven. The drying oven has ten levels and two zones. The initial zone operates at 277 to 288°C (530 to 550°F), while the second zone operates at 191°C (375°F). The initial zone drives off most of the moisture while the second zone permits continued drying. The board emerges from the ovens at about 0.5 % moisture. The dryer utilises No. 2 Fuel Oil as the fuel source and is equipped with two exhaust stacks, one for each zone, that are 0.9 m (3.95 ft) in diameter and 6.7 m (21.9 ft) above adjacent ground level. The dryer exhaust stacks are considered a release point for process gas and are point sources of particulate matter (PM), sulphur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO) emissions to the atmospheric environment.
- F. WASTE WALLBOARD STOCKPILE AREA is located at the west end of the property and serves as storage for the waste wallboard generated from the operation. The stockpile location is considered a potential source of wastewater generation that could impact the soils, groundwater and surface water environments in close proximity to the source.

G. PERIPHERAL DRAINAGE DITCH - is the drainage ditch that surrounds the plant. The ditch receives process wastewater from the facility and any site run-off from the property. The ditch feeds into a small swamp or wetland area at the west end of the property adjacent to the Waste Wallboard Stockpile Area. The ditch is considered a source of wastewater discharge to the environment that could impact the soils, groundwater, and surface water environments in close proximity to the source.

C. TERMS AND CONDITIONS

GENERAL CONDITIONS

- 7. This Facility has been classified as a Class 2 source, pursuant to the Air Quality Regulation 97-133 filed under the Clean Air Act. The Approval Holder shall pay the appropriate annual fee within 30 days of receiving an invoice.
- 8. This Facility has been classified as a **Class 4** Facility, pursuant to the *Fees for Industrial* Approvals Regulation 93-201 under the Clean Water Act.
- 9. The Approval Holder shall operate the Facility in compliance with the Air Quality Regulation 97-133 filed under the Clean Air Act and the Water Quality Regulation 82-126 filed under the Clean Environment Act of the Province of New Brunswick. Violation of any term and condition herein stated constitutes a violation of the Clean Air Act and Clean Environment Act.
- 10. The terms and conditions of this Approval are severable. If any term or condition of this Approval is held invalid, is revoked or is modified, the remainder of the Approval shall not be affected.
- 11. **Prior to June 01, 2007**, The Approval Holder shall make application in writing on a form provided by the Minister for a renewal of this Approval.
- 12. The Approval Holder shall notify the Minister in writing of any plans to modify the operation of the Facility that would result in a significant change in the characteristics or increased rate of discharge or concentration of any pollutants to the environment at least ninety (90) days prior to the modification.
- 13. In the event of facility closure, the Approval Holder shall notify the Minister in writing at least ninety (90) days prior to the anticipated closure date.

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EMERGENCY RESPONSE

14. In the event of any release and/or discharge to the soil, surface water, groundwater and atmospheric environments from an upset condition which is of such a magnitude or duration that the health or safety of the general public may be at risk, significant harm to the environment could or has resulted, or has resulted in a complaint from the public to the Facility, and any violation of this Approval. The Approval Holder shall follow the Notification and Reporting Procedures outlined below.

Notification Procedure

The Approval Holder shall immediately notify the Department. The notification shall be conducted in the following order until personal contact is made with a person associated with one of the parties listed below:

by phone to the Region 5 (Fredericton) Office at (506) 444-5149 by phone to Canadian Coast Guard at 1-800-565-1633

Reporting Procedure

Within 24 hours from notification, a faxed or e-mailed copy of a Preliminary Emergency Report shall be filed with the Region 5 (Fredericton) Office at (506) 453-2893 and Head Office in Fredericton at (506) 453-2390 and clearly communicate as much information that is available at that time about the situation.

Within five (5) working days from notification, a faxed or e-mailed Detailed Emergency Report that describes the problem that occurred, the impact that occurred, what was done to minimize the impact, and what steps have been implemented to prevent the reoccurrence of the problem shall be filed with the Region 5 (Fredericton) Office at (506) 453-2893 and the Head Office in Fredericton at 453-2390.

WASTEWATER MANAGEMENT

15. This Approval permits the wastewater generated from the processes at the Facility to be discharged to the Peripheral Drainage Ditch surrounding the plant. The Approval Holder shall ensure that all domestic wastewater generated at the Facility is directed to the Municipal Sanitary Sewage Treatment Facility for treatment.

SOLID WASTE MANAGEMENT

16. The Approval Holder shall ensure that no waste, other than recyclable waste wallboard, is disposed of in the Waste Wallboard Storage Area. All other wastes that may include, but not be limited to, domestic garbage and non-recyclable waste wallboard shall be sent to the Approved Regional Landfill for disposal.

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17. The Approval Holder shall not expand the current footprint of the existing Waste Wallboard Storage Area.

FUGITIVE PARTICULATE MATTER CONTROL

18. The Approval Holder shall ensure that fugitive particulate matter emissions being emitted from the Facility do not cause adverse impacts to any off-site receptor. In the event fugitive particulate matter emission impacts are suspected by the Department to be adversely impacting any off-site receptor, the Approval Holder will be required to develop, submit, and implement a Fugitive Particulate Matter Prevention and Control Plan in accordance with a timetable established by the Department. The plan shall be submitted in writing to the Department for review and approval prior to implementation.

NOISE CONTROL

19. The Approval Holder shall ensure that noise being emitted from the Facility does not adversely impact any off-site receptors. In the event noise impacts are suspected by the Department to adversely impact the environment, the Approval Holder will be required to develop, submit, and implement a Noise Prevention and Control Plan in accordance with a timetable established by the Department. The plan shall be submitted in writing to the Department for review and approval prior to implementation.

EMISSION LIMITS

- 20. The Approval Holder shall ensure that the total combined release of Sulphur Dioxide (SO₂) from all sources at the Facility does not exceed 250 tonnes per calendar year.
- 21. The Approval Holder shall ensure that the total combined release of Particulate Matter (PM) from all sources at the Facility does not exceed 250 tonnes per calendar year.
- 22. The Approval Holder shall ensure that the total volumetric flow of process gas being released from all sources at the Facility does not exceed 3000 actual cubic metres per minute (m³/min).

DISCHARGE LIMITS

23. The Approval Holder shall ensure that as a result of process water drainage and site runoff to the Peripheral Drainage Ditch does not cause a deleterious impact to the environment. In the event that deleterious impacts are suspected by the Department, the Approval Holder will be required to develop, submit, and implement a Pollution Prevention and Control Plan in accordance with a timetable established by the Department. The Plan shall be submitted in writing to the Department for review and approval prior to implementation. WESTROC INC.

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TESTING AND MONITORING

- 24. **Prior to October 31, 2003**, the Approval Holder shall ensure that a source testing campaign is completed on the following point sources at the Facility: the Rock Dryer Exhaust Stack; the Calcine Mill Exhaust Stack; and the two Dryer Oven Exhaust Stacks. The source testing campaign shall be completed representing normal operating conditions for the Rock Dryer, Calcine Mill, and Wallboard Drying Oven. The testing shall include the following parameters: Particulate Matter (PM), Sulphur dioxide (SO2), Nitrogen oxides (NOx), and Carbon monoxide (CO).
- 25. The Approval Holder shall ensure that all the official source testing undertaken by the Approval Holder or on behalf of the Approval Holder are completed in accordance with the requirements embodied in the Department's Code of Practice for Source Testing.
- 26. The Approval Holder shall complete a worst-case air quality dispersion modelling study following source testing activities. The study shall determine the maximum 1-hour and 24-hour ground level concentrations in micrograms per cubic metre for the parameters specified in the source testing activities for that year. The maximum concentrations shall be shown graphically as concentration contours in relation to the facility and off-site receptors within a five kilometre radius. The model to be used shall be a multisource model that is acceptable to the Department and shall use the previous five years of hourly meteorological data from the nearest weather station.
- 27. The Approval Holder shall ensure that process gas flow testing is undertaken twice per year to determine the total process gas being released to the atmospheric environment from the Rock Dryer Exhaust Stack, the Calcine Mill Exhaust Stack, and the Drying Oven Exhaust Stacks. The two sets of tests shall be conducted at least 4 months apart during the same calendar year.
- 28. The Approval Holder shall conduct two rounds of grab sampling of the water that is in the Peripheral Drainage Ditch. For each round, the grab sampling shall be where the Peripheral Drainage Ditch enters the Facility's property, and where the Peripheral Drainage Ditch exits the Facility's property. These samples shall be analysed for Total Petroleum Hydrocarbons, suspended solids, pH, calcium, sulphite and sulphate. All required analysis shall be conducted by a certified laboratory. The 2 sets of tests shall be conducted at least 4 months apart during the same calendar year.
- 29. The Approval Holder shall keep an inventory of the annual amount of Waste Wallboard that is stored in the Waste Wallboard Storage Area at the Facility in tonnes per year.
- 30. The Approval Holder shall ensure that all the aboveground chemical storage systems that store chemicals at the Facility and are located outside, are to be visually inspected for leaks once per month.

WESTROC INC.

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31. The Approval Holder shall ensure that all aboveground petroleum storage systems that store petroleum products for the purposes of dispensing product to vehicles and/or fueling ancillary equipment at the Facility and located outside are visually inspected for leaks once per month.

REPORTING

- 32. **Prior to March 31, 2003**, the Approval Holder shall submit to the Department a detailed engineered Facility layout drawing that includes as a minimum an illustration of all of the following items on the property:
 - Buildings;
 - Exhaust Stacks;
 - Wastewater Discharges;
 - Peripheral Drainage Ditch;
 - Gypsum Rock Stockpile;
 - Site Access Roads;
 - Water Supply Wells; and
 - Waste Wallboard Storage Area.
- 33. **Prior to September 30, 2003**, the Approval Holder shall ensure that a Pre-Test Plan pertaining to the source testing campaign, as required in item 26 of the Terms and Conditions of this Approval, is filed with the Department for review and written approval prior to conducting the official source testing.
- 34. **Prior to November 30, 2003**, the Approval Holder shall ensure that a Final Report pertaining to the source testing campaign, as required in item 26 of the Terms and Conditions of this Approval, is filed with the Department for review.
- 35. **Prior to December 31, 2003**, the Approval Holder shall ensure that a Final Report summarizing the results of the air dispersion modeling study, as required in item 29 of the Terms and Conditions of this Approval, is submitted to the Department for review.
- 36. By January 31 of each year, the Approval Holder shall submit to the Department an Annual Environmental Report which includes as a minimum the following:
 - a) the annual amount and type of fuel oil used at the Facility in litres for the previous year;
 - b) the sulphur content of the fuels used in a);
 - c) a calculation of the total sulphur dioxide being emitted from the Facility in tonnes per year, based on the fuel consumption and sulphur content provided in a) and b);
 - d) a summary report on the results from the two rounds of process gas flow testing for the previous year;

WESTROC INC.

- e) a summary report on the results from the two rounds of grab sampling and analysis required in the Peripheral Drainage Ditch for the previous year;
- f) a summary report on the inventory of waste wallboard that was stored at the Waste Wallboard Storage Area for the previous year;
- g) a summary report on the results from the monthly visual inspections of the outside aboveground petroleum and chemical storage systems; and
- h) a summary of any reportable upset conditions and/or spills that occurred during the previous year.

Prepared by:

Anild Sarah Arnold, M.Eng

Project Manager, Approvals Branch

Reviewed by:

Don Grass, P.Eng. Industrial Approvals Engineer, Approvals Branch APPENDIX B

NPRI 2004 FACILITY & SUBSTANCE INFORMATION



Environment Environnement Canada Canada

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April 11, 2006



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Data as of March 29, 2006

ON-LINE DATA SEARCH

Canadä

Please note that the 2004 data on the following results page is preliminary and unreviewed

2004 Facility & Substance Information

BPB CANADA INC

NPRI ID: 5095 MCADAM PLANT 57 Quality Way McAdam, NB E6J 1B1 Canada

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- Facility Information
- Historical Substance Reports
- Criteria Air Contaminant Substance Report
- Help document

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Criteria Air Contaminant Substances

CAS No	Critera Air Contaminants	Releases to Air	Units
		<u>Details</u>	
11104-93-1	Oxides of nitrogen (expressed as NO2)	81.100	tonnes
NA - M08	PM - Total Particulate Matter	14.150	tonnes
NA - M10	PM2.5 - Particulate Matter <= 2.5 Microns	9.000	tonnes
7446-09-5	Sulphur dioxide	278.460	tonnes

341025115

CAD ADDA

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Units tonnes - 1000 kilograms g - grams kg - kilograms g TEQ - grams of Toxic Equivalents

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 The Green Lane[™], Environment Canada's World Wide Web site

 Last updated: 2004-01-21
 Important Notices

 Last reviewed: 2004-01-21
 URL of this page:

 http://www.ec.gc.ca/pdb/querysite/facility_substance_summary_e.cfm

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	What's New	- Topics	Publications	Weather	Home
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Data as of March 29, 2006

Please note that the 2004 data on the following results page is preliminary and unreviewed

2004 Facility Substance Details

Oxides of nitrogen (expressed as NO2) (CAS# 11104-93-1) (tonnes)

BPB CANADA INC

No. of Control of Cont

April 11, 200

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NPRI ID: 5095 MCADAM PLANT 57 Quality Way McAdam, NB E6J 1B1 Canada

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- Pollution Prevention Activities

Industrial Classifications

- 2-Digit Canadian SIC 39 Other Manufacturing Industries
- 4-Digit Canadian SIC 3999 Other Manufactured Prods. Inds., nec
- American SIC 3999 Manufacturing Industries, nec
- NAICS Code 3399 Other Miscellaneous Mfg.

Nature of Activites

• Manufacture

As a by-product.

Process

http://www.ia.com/www.itelevile.com/actile___efm?ant_mmi_id_0000005005.comt_____4/11/0004

N/A.

Otherwise Use

N/A.

Reporter Comments (Facility)

The facility did not provide any comments.

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On-Site Releases 🖉

Medium	Release	Quantity (tonnes)	Estimate Code
Releases to	Stack or point releases:	81.100	0
Air	Storage or handling releases:	0.000	NA
	Fugitive releases:	0.000	NA
	Spills:	0.000	NA
	Other non-point releases:	0.000	NA
	Sub-total:	81.100	
Total Release	9S:	81.100	

Basis of Estimate Codes

The Basis of Estimate codes for Monitoring and Direct Measurement (M) and Emission Factors (E) were expanded for the 2003 reporting year and onward to include more specific information on the type of monitoring and emissions factors used by a facility. The changes include the following:

- "Monitoring or Direct Measurements " was replaced with Continuous Monitoring Emission Systems (CEMS), Predictive Emission Monitoring (PEM), and Source Testing.
- "Emission Factors " was replaced with Site-specific Emission Factor and Published Emission Factor.
- M Monitoring or Direct Measurement In use from 1994 to 2002
- M1 Continuous Emission Monitoring In use from 2003 and onward
- M2 Predictive Emission Monitoring In use from 2003 and onward
- M3 Source Testing In use from 2003 and onward

C - Mass Balance

- E Emission Factor In use from 1994 to 2002
- E1 Site Specific Emission Factors In use from 2003 and onward
- E2 Published Emission Factors In use from 2003 and onward

O - Engineering Estimates

NA - Not Applicable

NI - No Information Available

* There may not be detailed release information for certain substances, because if the total releases of an NPRI Part 1A substance were less than one tonne, only the total releases may be reported.

Reasons for Changes in Quantities Released from Previous Year

Changes in Production Levels

Monthly Releases

Month	Release Percentage	Month	Release Percentage
January	8.330 %	July	8.330 %
Febuary	8.330 %	August	8.330 %
March	8.330 %	September	8.340 %
April	8.330 %	October	8.340 %
May	8.330 %	November	8.340 %
June	8.330 %	December	8.340 %

Anticipated Releases & On-Site Disposals

Year	Anticipated Release (tonnes)		
2005	89.200		
2006	89.200		
2007	89.200		

Reporter Comments (Releases)

Production Levels have increased by approximately 10% over from last year.

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Pollution Prevention Activities 🖉

Materials or feedstock substitution

Product design or reformulation

Equipment or Process Modifications

Spill and leak prevention

On-site Recovery, Re-use or Recycling

Improved inventory management or purchasing techniques

Good operating practices or training

No new pollution-prevention activities

Comments on Pollution Prevention Activities The facility did not provide any comments.

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April 11, 2006			NPRI		
	PERCENT AS DENZEN O S EAD ASSESS	stos sol		ON-LINE D	ATA SEARCH
NR.		the second constants of the second			

Data as of March 29, 2006

Please note that the 2004 data on the following results page is preliminary and unreviewed

2004 Facility Substance Details

PM - Total Particulate Matter (CAS# NA - M08) (tonnes)

BPB CANADA INC

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NPRI ID: 5095 MCADAM PLANT 57 Quality Way McAdam, NB E6J 1B1 Canada

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- Facility Substance Information
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Industrial Classifications

- 2-Digit Canadian SIC 39 Other Manufacturing Industries
- 4-Digit Canadian SIC 3999 Other Manufactured Prods. Inds., nec
- American SIC 3999 Manufacturing Industries, nec
- NAICS Code 3399 Other Miscellaneous Mfg.

Nature of Activites

Manufacture

As a by-product.

Process

- 11 1 . .

N/A.

Otherwise Use

N/A.

Reporter Comments (Facility)

The facility did not provide any comments.

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On-Site Releases 🖉

Medium	Release	Quantity (tonnes)	Estimate Code
Releases to	Stack or point releases:	14.150	0
Air	Storage or handling releases:	0.000	NA
	Fugitive releases:	0.000	NA
	Spills:	0.000	NA
	Other non-point releases:	0.000	NA
	Sub-total:	14.150	
Total Release	?S:	14.150	

Basis of Estimate Codes

The Basis of Estimate codes for Monitoring and Direct Measurement (M) and Emission Factors (E) were expanded for the 2003 reporting year and onward to include more specific information on the type of monitoring and emissions factors used by a facility. The changes include the following:

- "Monitoring or Direct Measurements " was replaced with Continuous Monitoring Emission Systems (CEMS), Predictive Emission Monitoring (PEM), and Source Testing.
- "Emission Factors " was replaced with Site-specific Emission Factor and Published Emission Factor.
- M Monitoring or Direct Measurement In use from 1994 to 2002
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- M2 Predictive Emission Monitoring In use from 2003 and onward
- M3 Source Testing In use from 2003 and onward

C - Mass Balance

- E Emission Factor In use from 1994 to 2002
- E1 Site Specific Emission Factors In use from 2003 and onward
- E2 Published Emission Factors In use from 2003 and onward

O - Engineering Estimates

NA - Not Applicable

NI - No Information Available

* There may not be detailed release information for certain substances, because if the total releases of an NPRI Part 1A substance were less than one tonne, only the total releases may be reported.

Reasons for Changes in Quantities Released from Previous Year

Changes in Production Levels

Monthly Releases

Month	Release Percentage	Month	Release Percentage
January	8.330 %	July	8.330 %
Febuary	8.330 %	August	8.330 %
March	8.340 %	September	8.340 %
April	8.330 %	October	8.330 %
May	8.330 %	November	8.330 %
June	8.340 %	December	8.340 %

Anticipated Releases & On-Site Disposals

Year	Anticipated Release (tonnes)
2005	15.560
2006	15.560
2007	15.560

Reporter Comments (Releases)

Production has increased by approximately 10% from 2003

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Pollution Prevention Activities 🖉

Materials or feedstock substitution

Product design or reformulation

Equipment or Process Modifications

Spill and leak prevention

On-site Recovery, Re-use or Recycling

Improved inventory management or purchasing techniques

Good operating practices or training

No new pollution-prevention activities

Comments on Pollution Prevention Activities The facility did not provide any comments.

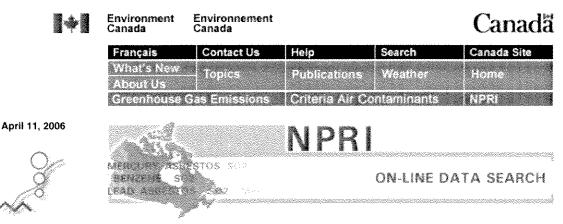
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Data as of March 29, 2006

Please note that the 2004 data on the following results page is preliminary and unreviewed

2004 Facility Substance Details

PM2.5 - Particulate Matter <= 2.5 Microns (CAS# NA - M10) (tonnes)

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Industrial Classifications

- 2-Digit Canadian SIC 39 Other Manufacturing Industries
- 4-Digit Canadian SIC 3999 Other Manufactured Prods. Inds., nec
- American SIC 3999 Manufacturing Industries, nec
- NAICS Code 3399 Other Miscellaneous Mfg.

Nature of Activites

Manufacture

As a by-product.

Process

 N/A.

Otherwise Use

N/A.

Reporter Comments (Facility)

The facility did not provide any comments.

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On-Site Releases 🖉

Medium	Release	Quantity (tonnes)	Estimate Code
Releases to	Stack or point releases:	9.000	0
Air	Storage or handling releases:	0.000	NA
	Fugitive releases:	0.000	NA
	Spills:	0.000	NA
	Other non-point releases:	0.000	NA
	Sub-total:	9.000	
Total Release	es:	9.000	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,

Basis of Estimate Codes

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- M1 Continuous Emission Monitoring In use from 2003 and onward
- M2 Predictive Emission Monitoring In use from 2003 and onward
- M3 Source Testing In use from 2003 and onward
- C Mass Balance
- E Emission Factor In use from 1994 to 2002
- E1 Site Specific Emission Factors In use from 2003 and onward
- E2 Published Emission Factors In use from 2003 and onward
- O Engineering Estimates
- NA Not Applicable
- NI No Information Available

* There may not be detailed release information for certain substances, because if the total releases of an NPRI Part 1A substance were less than one tonne, only the total releases may be reported.

Reasons for Changes in Quantities Released from Previous Year

Changes in Production Levels

Monthly Releases

Month	Release Percentage	Month	Release Percentage
January	8.330 %	July	8.330 %
Febuary	8.330 %	August	8.330 %
March	8.340 %	September	8.340 %
April	8.330 %	October	8.330 %
May	8.330 %	November	8.330 %
June	8.340 %	December	8.340 %

Anticipated Releases & On-Site Disposals

Year	Anticipated Release (tonnes)	
2005	9.900	
2006	9.900	
2007	9.900	

Reporter Comments (Releases)

Production has increased by approximately 10% from 2003

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Pollution Prevention Activities 🏈

Materials or feedstock substitution

Product design or reformulation

Equipment or Process Modifications

Spill and leak prevention

On-site Recovery, Re-use or Recycling

Improved inventory management or purchasing techniques

Good operating practices or training

No new pollution-prevention activities

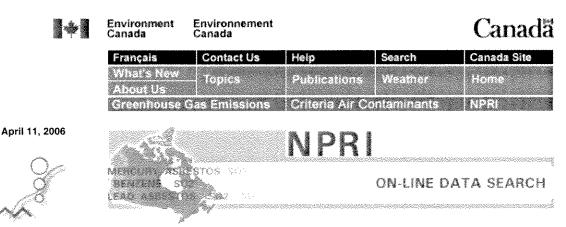
Comments on Pollution Prevention Activities The facility did not provide any comments.

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Data as of March 29, 2006

Please note that the 2004 data on the following results page is preliminary and unreviewed

2004 Facility Substance Details

Sulphur dioxide (CAS# 7446-09-5) (tonnes)

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Industrial Classifications

- 2-Digit Canadian SIC 39 Other Manufacturing Industries
- 4-Digit Canadian SIC 3999 Other Manufactured Prods. Inds., nec
- NAICS Code 3399 Other Miscellaneous Mfg.

Nature of Activites

Manufacture

As a by-product.

Process

American SIC - 3999 Manufacturing Industries, nec

N/A.

Otherwise Use

N/A.

Reporter Comments (Facility) The facility did not provide any comments.

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On-Site Releases 🖉

Medium	Release	Quantity (tonnes)	Estimate Code
Releases to	Stack or point releases:	278.460	0
Air	Storage or handling releases:	0.000	NA
	Fugitive releases:	0.000	NA
	Spills:	0.000	NA
	Other non-point releases:	0.000	NA
	Sub-total:	278.460	
Total Release	95:	278.460	

Basis of Estimate Codes

The Basis of Estimate codes for Monitoring and Direct Measurement (M) and Emission Factors (E) were expanded for the 2003 reporting year and onward to include more specific information on the type of monitoring and emissions factors used by a facility. The changes include the following:

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- M2 Predictive Emission Monitoring In use from 2003 and onward
- M3 Source Testing In use from 2003 and onward
- C Mass Balance
- E Emission Factor In use from 1994 to 2002
- E1 Site Specific Emission Factors In use from 2003 and onward
- E2 Published Emission Factors In use from 2003 and onward
- O Engineering Estimates
- NA Not Applicable
- NI No Information Available

* There may not be detailed release information for certain substances, because if the total releases of an NPRI Part 1A substance were less than one tonne, only the total releases may be reported.

Reasons for Changes in Quantities Released from Previous Year

Changes in Production Levels

Monthly Releases

Month	Release Percentage	Month	Release Percentage
January	8.330 %	July	8.330 %
Febuary	8.330 %	August	8.330 %
March	8.340 %	September	8.340 %
April	8.330 %	October	8.330 %
May	8.330 %	November	8.330 %
June	8.340 %	December	8.340 %

Anticipated Releases & On-Site Disposals

Year	Anticipated Release (tonnes)	
2005	306.000	
2006	306.000	
2007	306.000	

Reporter Comments (Releases)

Production Levels have increased by approximatley 10% for 2003

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Pollution Prevention Activities 🖉

Materials or feedstock substitution

Product design or reformulation

Equipment or Process Modifications

Spill and leak prevention

On-site Recovery, Re-use or Recycling

Improved inventory management or purchasing techniques

Good operating practices or training

No new pollution-prevention activities

Comments on Pollution Prevention Activities The facility did not provide any comments.

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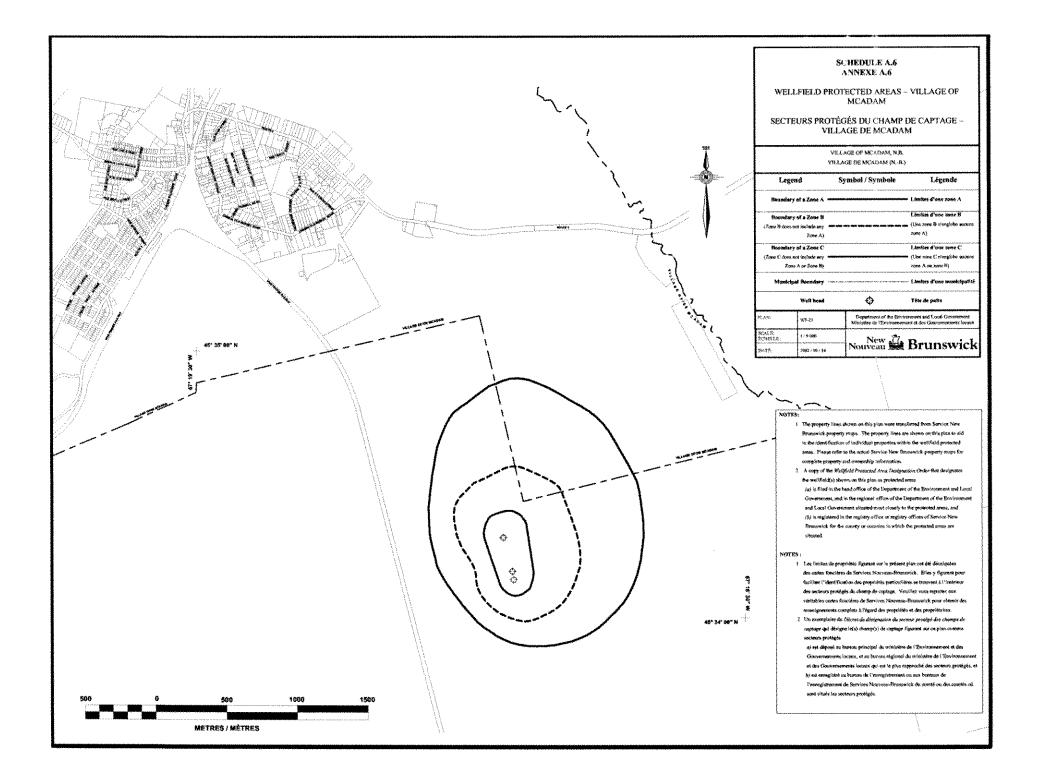
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APPENDIX C

WELLFIELD PROTECTED AREAS - VILLAGE OF MCADAM (Schedule A.6 of the New Brunswick Wellfield Protected area Designation Order 2000-47)



APPENDIX D

NBENV CORRESPONDENCE

Environment and Local Government Environnement et Gouvernements locaux

April 24, 2006 File No.: 205-02-R5



CRA 466 Hodgson Rd. Fredericton, NB E3C 2G5 <u>Attention</u>: Heather MacDonald Your file ref#: B10712C

RE:	Owner:	Nova Gypsum Inc.	
	Location:	Quality Was, Harvey R	d., McAdam
	 PID #s:	01534668, 75013094	

In response to your request for information regarding the above noted properties, please be advised that a search of departmental electronic databases has been conducted with the information provided, and the following information was found.

There is no record of Ministerial Orders or Remediation Orders related to these PID numbers.

Petroleum storage tank information related to PID #01534668 & 75013094 is attached. These tanks have been registered with the Department, under the Petroleum Product Storage and Handling Regulation.

Our records indicate that there has been contamination found at 57 Quality Was., McAdam, Westroc Industries Inc. (PID#01534668). See attached information report.

These PID numbers are not registered with the Department as PCB Storage sites.

We have no records of landfill sites located near these PID numbers.

The absence of departmental records in this search does not necessarily indicate that the sites have not been subject to environmental incidents. The information is accurate in that it provides a factual reflection of what is contained in departmental databases. The files themselves may or may not be complete. As an example, in the case of underground petroleum storage tanks, the files accurately reflect all those that were registered with the program; there may be underground storage tanks that were not registered and of which the Department has no knowledge. Likewise, there may be incidents of spills of which the Department was not informed or which pre-date Departmental records. The "Remediation Site Management System" was recently established and does not contain a complete history of past spills or remediation efforts. Furthermore, if the properties have been recently subdivided, the PID #s provided may not correspond with those contained in departmental files and thus on the databases.

Any persons intending to purchase or occupy the property should make their own independent determination of the environmental condition of the property and the extent of responsibility and liability, if any, that may arise from taking ownership or occupancy.

Remediation Branch-Environmental Management Division

Enclosures:

PO. Box 6000 Fredericton New Brunswick Canada E3B 5H1 Case postale 6000 Fredericton Nouveau-Brunswick Canada E3B 5H1

/ta

PETROLEUM STORAGE TANK INFORMATION

PID # 01534668	SITE #: 3423	ADDRESS: BPB Canada It 57 Quality Way McAdam, NB	
Tank Information:		THE FRIDARY IND	
CURRENT STATUS:	Active	CURRENT STATUS:	Inactive
DATE OUT OF SERVICE:	N/A	DATE OUT OF SERVICE:	Unknown
INSTALLATION DATE:	1987	INSTALLATION DATE:	1987
TANK SIZE:	9000 L	TANK SIZE:	44500 L
SUBSTANCE STORED:	Furnace Oil	SUBSTANCE STORED:	Bunker
LOCATION:	Above Ground	LOCATION:	Above Ground
CONSTRUCTED OF:	Single Wall Steel	CONSTRUCTED OF:	Single Wall Steel
CURRENT STATUS:	Active	CURRENT STATUS:	Active
DATE OUT OF SERVICE:	N/A	DATE OUT OF SERVICE:	N/A
INSTALLATION DATE:	1990	INSTALLATION DATE:	1990
TANK SIZE:	113500 L	TANK SIZE:	113500 L
SUBSTANCE STORED:	Bunker	SUBSTANCE STORED:	Furnace Oil
LOCATION:	Above Ground	LOCATION:	Above Ground
CONSTRUCTED OF:	Single Wall Steel	CONSTRUCTED OF:	Single Wall Steel
CURRENT STATUS:	Active	CURRENT STATUS:	Inactive
DATE OUT OF SERVICE:	N/A	DATE OUT OF SERVICE:	Unknown
INSTALLATION DATE:	Unknown	INSTALLATION DATE:	Unknown
TANK SIZE:	1100 L	TANK SIZE:	1100 L
SUBSTANCE STORED:	Diesel	SUBSTANCE STORED:	Gasoline
LOCATION:	Above Ground	LOCATION:	Above Ground
CONSTRUCTED OF:	Single Wall Steel	CONSTRUCTED OF;	Single Wall Steel
CURRENT STATUS:	Inactive	CURRENT STATUS:	Active
DATE OUT OF SERVICE:	Unknown	DATE OUT OF SERVICE:	N/A
INSTALLATION DATE:	Unknown	INSTALLATION DATE:	Unknown
TANK SIZE:	900 L	TANK SIZE:	900 L
SUBSTANCE STORED:	Furnace Oil	SUBSTANCE STORED:	Gasoline
LOCATION:	Above Ground	LOCATION:	Above Ground
CONSTRUCTED OF:	Single Wall Steel	CONSTRUCTED OF:	Single Wall Steel
CURRENT STATUS: DATE OUT OF SERVICE: INSTALLATION DATE: TANK SIZE: SUBSTANCE STORED: LOCATION:	Removed Unknown Unknown 1100 L Gasoline Above Ground	CURRENT STATUS: DATE OUT OF SERVICE: INSTALLATION DATE: TANK SIZE: SUBSTANCE STORED: LOCATION:	Removed Unknown Unknown 1100 L Diesel

LOCATION:

CONSTRUCTED OF:

Above Ground

Single Wall Steel

LOCATION:

CONSTRUCTED OF:

Above Ground

Single Wall Steel

CURRENT STATUS: DATE OUT OF SERVICE: INSTALLATION DATE: TANK SIZE: SUBSTANCE STORED: LOCATION: CONSTRUCTED OF:	Removed Unknown Unknown 1100 L Diesel Above Ground Single Wall Steel	CURRENT STATUS: DATE OUT OF SERVICE: INSTALLATION DATE: TANK SIZE: SUBSTANCE STORED: LOCATION: CONSTRUCTED OF:	Removed 95.11.30 1975 36320 L Diesel Under Ground Single Wall Steel			
CURRENT STATUS: DATE OUT OF SERVICE: INSTALLATION DATE: TANK SIZE: SUBSTANCE STORED: LOCATION: CONSTRUCTED OF:	Removed 95.11.30 1978 36320 L Bunker Under Ground Single Wall Steel					
	PETROLEUM STORAGE TANK INFORMATION					
PID # 75013094	SITE #: 0932	ADDRESS: Border Cedar M Industrial Park McAdam, NB	611			
Tank Information: Current Status: Date Out of Service: Installation Date: Tank Size: Substance Stored: Location: Constructed of:	Removed 89.07.28 1982 11365 L Unknown Above Ground Single Wall Steel	CURRENT STATUS: DATE OUT OF SERVICE: INSTALLATION DATE: TANK SIZE: SUBSTANCE STORED: LOCATION: CONSTRUCTED OF:	Removed 89.07.28 1982 9100 L Unknown Above Ground Single Wall Steel			

NBDELG Remediation Sites Management System Information Report

File #:	6515-5-0304		
Parcel Identifier (PID)	01534668		
Site Name	Westroc Industries Ltd.		
Civic Address	57 Quality Way, McAdam		
Site Management File Opened	April 14, 1997		
Contamination Type	Industrial/Hazardous Waste		
Site Management File Status	Closed		
	1992 Generic criteria achiev	ved, no further action ne	cessary.
Party Responsible for Remediation	Other		
Consultant	none		
Order(s) Specific to Remediation Is:	sued No	issued:	Rescinded:

A translated version of this report is available on request. Please contact:

Tracey Arsenault 20 McGloin St. Fredericton, NB E3C 578 Phone: (506) 462-5936 Fax: (506) 457-7333 E-mail: Tracey.Arsenault@gnb.ce Une version tradulte de ce rapport est disponible sur demande. S'Il vous plait contacter:

Tracey Arsenault 20, rue McGioin Fredericton, NB E3C 578 Téléphone: (506) 452-5936 Télécopieur: (506) 457-7333 Courriel: Tracey.Arsenault@gnb.ca