



Comment Index

GLC Liquid Asphalt Storage Facility

Publication date: May 1, 2020

Government

Number	Source	Date Received
1	Nova Scotia Environment – Protected Areas and Ecosystems	April 30, 2020
2	Nova Scotia Environment - ICE	May 15, 2020
3	Nova Scotia Environment – Air Quality Unit	May 21, 2020
4	Nova Scotia Environment – Resource Management Unit	May 25, 2020
5	Nova Scotia Agriculture	May 26, 2020
6	Nova Scotia Fisheries and Aquaculture	May 26, 2020
7	Nova Scotia Environment – Water Resource Management Unit- Wetlands	May 26, 2020
8	Nova Scotia Municipal Affairs and Housing	May 27, 2020
9	Nova Scotia Department of Business	May 28, 2020
10	Nova Scotia Environment – Resource Management Unit – additional comment	May 28, 2020
11	Nova Scotia Lands and Forestry	May 29, 2020
12	Nova Scotia Environment – Climate Change Unit	May 29, 2020
13	Impact Assessment Agency of Canada	May 29, 2020
14	Nova Scotia Transportation and Infrastructure Renewal	May 29, 2020
15	Nova Scotia Environment – Water Resources Management Unit - Hydrogeology	May 29, 2020



16	Nova Scotia Office of Aboriginal Affairs	May 29, 2020
17	Fisheries and Oceans Canada	May 29, 2020
18	Nova Scotia Environment – Environmental Health	May 30, 2020
19	Nova Scotia Environment – Water Resources Management Unit – Water Resource Engineer	May 30, 2020
20	Nova Scotia Environment – Water Resources Management Unit – Water Quality Specialist	May 31, 2020
21	Health Canada	May 31, 2020
22	Nova Scotia Communities, Culture and Heritage	June 1, 2020
23	Nova Scotia Environment – ICE – Central Region	May 22, 2020
24	Environment and Climate Change Canada	June 9, 2020

Mi'kmaq of Nova Scotia

Number	Source	Date Received
1		

Public

Number	Source	Date Received
1	anonymous	May 2, 2020
2	anonymous	May 2, 2020
3	anonymous	May 2, 2020
4	anonymous	May 4, 2020
5	Barbara Adams, MLA	May 8, 2020

6	anonymous	May 8, 2020
7	anonymous	May 12, 2020
8	Anonymous	May 23, 2020
9	Anonymous	May 24, 2020
10	Anonymous	May 27, 2020
11	Anonymous	May 27, 2020
12	#56234	May 22, 2020
13	#56237	May 22, 2020
14	Anonymous	May 29, 2020
15	Anonymous	May 29, 2020
16	Anonymous	May 29, 2020
17	Anonymous	May 29, 2020
18	Anonymous	May 29, 2020
19	Anonymous	May 29, 2020
20	Anonymous	May 30, 2020
21	Anonymous	May 30, 2020
22	Anonymous	May 30, 2020
23	Anonymous	May 29, 2020
24	Anonymous	May 29, 2020
25	Anonymous	May 29, 2020
26	Anonymous	May 31, 2020

27	Anonymous	May 31, 2020
28	Anonymous	May 31, 2020
29	Anonymous	May 31, 2020
30	Anonymous	May 31, 2020
31	Anonymous	May 31, 2020
32	Anonymous	May 31, 2020
33	Anonymous	May 31, 2020
34	Anonymous	May 31, 2020
35	Anonymous	May 31, 2020
36	Anonymous	May 31, 2020
37	Anonymous	May 31, 2020
38	Anonymous	May 31, 2020
39	Anonymous	June 1, 2020
40	Anonymous	Jun 1, 2020
41	Anonymous	Jun 1, 2020
42	Anonymous	Jun 1, 2020
43	Anonymous	May 29, 2020

MEMORANDUM

DATE: April 30, 2020

TO: Jeremey Higgins

FROM: Neil Morehouse Manager Protected Areas and Ecosystems

SUBJECT: Liquid Asphalt Storage Facility -Dartmouth- Environmental Assessment

The Protected Areas and Ecosystems Branch have reviewed the Environmental Assessment Application for the Liquid Asphalt Storage Facility project

Protected Areas and Ecosystem Comments:

As there are no protected areas in the vicinity of this project, no impacts to protected areas are anticipated.

Environment

Date: May 15 , 2020

To: Jeremy Higgins, Environmental Assessment Officer, Nova Scotia
Environment

From: Derrick Peverill, Inspector Specialist, Inspection, Compliance and
Enforcement, Nova Scotia Environment

Subject: General Liquids Canada, Liquid Asphalt Storage Facility Project

Mr. Higgins,

In relation to the above noted application I have completed a review and can provide the following comments:

On January 29th, 2020, an inspection was conducted at 750 Pleasant Street in Dartmouth Nova Scotia, PID 00260703, in relation to construction activity occurring on the site. Inspector Derrick Peverill and Nova Scotia Environment (NSE) Engineer Bernie Matlock attend the site and spoke with the project manager Megan Hutchinson. It was explained to Ms. Hutchinson that NSE was inquiring as to the activity occurring on site. Ms. Hutchinson stated that the purpose of the proposed construction was for the building of a liquid asphalt storage facility for General Liquids Canada (GLC), also denoted as 3242111 Nova Scotia Limited. She stated that Dexter Construction was contracted to construct the facility for General Liquids Canada. She also stated that for further information Inspector Peverill could contact Jerry Scott with Dexter construction. At the time of inspection, it was noted that a large storage tank was on site. This tank was being worked on at the time of inspection. It was also noted that work was commencing on foundation forms for a building next to the tank. Photos were taken at the time of inspection.

Later in the day (appx 1613 hrs) on January 29th, contact was made via a phone call with Jerry Scott from Dexter. Mr. Scott stated that Dexter Construction was contracted by GLC to construct a building to house heating equipment for the asphalt storage tank that GCL will be using to house liquid asphalt.

February 19th, 2020 - Megan Hutchinson was interviewed in the Bedford NSE office in relation to the activity occurring at 750 Pleasant Street in Dartmouth Nova Scotia, PID 00260703. During the interview Ms. Hutchinson reiterated that the construction on site

was in relation to GLC constructing a liquid asphalt storage facility.

February 20th, 2020 – a call was placed to -Director of Manufacturing -
Municipal Group of Companies, to explain the position of the department.
was told that at this time the company was not in compliance with section 10 1) f) of the
Activities Designation Regulations, and that the company should put forward an
application to the department as soon as possible. It was also explained that the
continued activity on site is considered a violation and further compliance action may be
considered.

Upon review of the material provided I have no concerns with the information submitted.
However, currently ICE is considering further compliance action for violation of section
10 1) f) of the Activities Designation Regulations for commencement of an activity
without proper approval.

Should you wish anything further please contact me at any time.

Best Regards,

Derrick Peverill

Inspector Specialist
Nova Scotia Environment

Date: May 20, 2020

To: Jeremy Higgins, Environmental Assessment Officer

From: Air Quality Unit

Subject: General Liquids Canada Liquid Asphalt Storage Facility, Dartmouth N.S

Further to your request, the Air Quality Unit provides the following comments with respect to the Air Quality sections of the Class I Environmental Assessment Registration Document, dated April 24, 2020, for the above-mentioned project:

- 1) According to the report, the nearest resident is located 150 m from the proposed activity. The consultant has indicated that the proposed project is not expected to increase noise above that of the surrounding area as the site is located in an industrial/commercial area, near a busy 4 lane corridor (Pleasant Street) and Shearwater airport. The consultant also notes that they do not expect the noise to exceed NSE guidelines. However, there was no quantitative assessment of noise included in the Environmental Assessment to support this claim. In addition, the report provided limited provisions to address noise if it becomes a problem during construction and/or operation.
- 2) The air quality considerations in the Environmental Assessment were limited to the evaluation of air contaminants identified in Schedule A of the Air Quality Regulations, fine and coarse particulate matter and carbon dioxide. The proponent should have identified the full emissions inventory of all potential air contaminants of concern for the facility, including but not limited to speciated volatile organic compounds.
- 3) The estimated ground level concentrations of potential air contaminants and air dispersion modelling was not completed as part of the Environmental Assessment report. All potential air contaminants of concern, as a result of the proposed project should be modelled. The maximum predicted ground level concentrations of all contaminants should be compared with relevant ambient air quality criteria. In the absence of NS adopted ambient air quality criteria, the Proponent should utilize criteria from Federal and/or other Provincial jurisdictions.
- 4) According to the Environmental Assessment Report, the storage tanks will be connected with a series of pipes and conveyed to activated carbon filters to remove volatile organic compounds. The report does not include details on the operation and maintenance of the carbon filters. Any Division V Application for Approval for this project should include details regarding the operation,

maintenance and monitoring of the carbon filter treatment units.

Environment

Date: May 25, 2020

To: Jeremy Higgins, Environmental Assessment Officer

From: Chuck McKenna, Manager Resource Management Unit

Subject: General Liquids Canada Liquid Asphalt Storage Facility, Dartmouth N.S

Further to your request, the Resource Management Unit provides the following comments on the Class I Environmental Assessment Registration Document, dated April 24, 2020, for the above-mentioned project:

1. It is unclear on the volume of Liquid Asphalt that will be stored at the site and how many tanks the proponent is asking to be assessed as part of this EA. Future expansions would usually be considered as a separate project.
2. There was no discussion on the type of asphalt that will be handled at the facility and how this could impact emissions. There was no information provided on chemical additives stored and handled on site.
3. Liquid asphalt is not defined as a petroleum product under the Petroleum Management Regulations. This material is considered a dangerous good pursuant to the Nova Scotia Dangerous Goods Management Regulations (DGMR). Therefore, the provisions of the DGMR will also apply to this facility.
4. In the summary of Provincial Legislation the applicable section of the Activities Designation Regulations for a chemical storage facility has not been listed.
5. The nearest resident is stated to be 150 m from the proposed activity. The consultant has indicated that the proposed project is not expected to cause any air quality concerns as an activated carbon filter will be installed as a mitigative measure. The report did not assess local air emission impacts. In general, activated carbon systems may be subject to breakthrough if detailed maintenance procedures are not followed or monitoring devices or systems not installed or active. Absorbent - type systems can also be subject to plugging when used with heavy hydrocarbon products or substances that may polymerize.
6. Ten-year internal inspections for storage tanks should be a minimum and should be more frequent if significant corrosion is noted or internal repairs are required.
7. There is limited information provided on generation or management of liquid wastes while operating. These are likely to be real and potentially significant and should be

presented and discussed in more detail for each environmentally hazardous substance being handled onsite.

8. Information has not been provided on the design and operation of the oil-water separator.
9. There is very little information about the existing large tank that is proposed to be used for storage of liquid asphalt (e.g. age, materials of construction, type of roof, insulation, heating capabilities). This should be expanded to ensure that this tank is suitable for storage of liquid asphalt. There are insufficient details on containment for this or other tanks proposed to be used for liquid asphalt storage. While the proponent notes that liquid asphalt will harden quickly when it cools so is unlikely to move far, this would only be applicable to small spills or drips and would not likely be the case for a large release where the volume and heat transfer rate would permit flows to move further and potentially offsite if not adequately managed.
10. The anticipated elements of an emergency response and contingency plan have been provided. As a minimum, the emergency response plan for the facility must be in accordance with the Nova Scotia Environment Contingency Planning Guidelines. This will require an all hazards approach including information on potential releases to air. The plan must detail the potential worst-case incident and ensure the resources are available to respond.

DRAFT

Agriculture

Date: May 31, 2020

To: Jeremy Higgins, Nova Scotia Environment

From: Executive Director, Policy and Corporate Services,
Nova Scotia Department of Agriculture

Subject: Liquid Asphalt Storage Facility Project– Environmental Assessment

Thank you for the opportunity to review the Liquid Asphalt Storage Facility Project documents.

The Nova Scotia Department of Agriculture has no immediate concerns with the proposal.

Fisheries and Aquaculture

Date: May 31, 2020

To: Jeremy Higgins, Nova Scotia Environment

From: Executive Director, Policy and Corporate Services
Nova Scotia Department of Fisheries and Aquaculture

Subject: Liquid Asphalt Storage Facility Project - Environmental Assessment

Thank you for the opportunity to review the Liquid Asphalt Storage Facility Project documents.

The Nova Scotia Department of Fisheries and Aquaculture has no immediate concerns with the proposal.

Environment

Date: May 26, 2020

To: Jeremy Higgins, Nova Scotia Environment – EA Branch

From: Wetland & Water Resources Specialist, Water Resources Management Unit

Subject: Liquid Asphalt Storage Facility, Dartmouth, NS: Environmental Assessment
Registration - Wetlands

Scope of Review:

The following review of the General Liquids Canada Liquid Asphalt Storage Facility (Dartmouth, NS) Environmental Assessment Registration (Dillon Consulting, 2020) is specific to the mandate of the NSE Wetlands Program within the Sustainability and Applied Sciences (SAS) Division. The review considers whether the environmental concerns associated with wetlands and the proposed mitigation measures to be applied have been adequately addressed within the Environmental Assessment.

Reviewed Documents:

- Dillon Consulting. 2020. *Environmental Assessment Registration Document – Liquid Asphalt Storage Facility, Dartmouth, Nova Scotia*. General Liquids Canada, The Municipal Group of Companies.

General Comments:

- It is indicated in the EA Registration Document that the Project site is a previously developed site, with no wetland features present. As such, the wetlands program has no comments related to this development.



Department of Municipal Affairs and Housing

Maritime Centre, Floor 8 North
1505 Barrington Street
PO Box 216
Halifax, NS B3J 2M4

Date: May 27, 2020
To: NS Environment
From: Department of Municipal Affairs and Housing
Subject: **ENVIRONMENTAL REVIEW:
GENERAL LIQUIDS CANADA - LIQUID ASPHALT STORAGE FACILITY PROJECT**

As requested, the Department of Municipal Affairs and Housing has reviewed the Environmental Assessment Registration Documents for the proposed General Liquids Canada Liquid Asphalt Storage Facility Project, located in Dartmouth, NS.

Although we have found nothing of concern respecting the Department's areas of mandate, we would like to remind the proponent to ensure that they have undertaken adequate consultation with the Municipality in order to confirm conditions for compliance with municipal planning policies and by-law provisions.

Thank you for the opportunity to review the Registration Documents for the above-noted project.

c: Graham Fisher, Senior Planner, DMAH

Date: May 28, 2020
To: Nova Scotia Environment
From: The Department of Business
Subject: Liquid Asphalt Cement Storage Facility Project

The mandate of the Department of Business (DOB) is to lead and align provincial government efforts behind a common agenda for inclusive economic growth. This mandate focuses on strategic priorities and opportunities that encourage Nova Scotia's innovation, competitiveness, entrepreneurship, and export orientation.

Fulfilling this mandate involves working collaboratively with our Crown corporations (Develop Nova Scotia, Halifax Convention Centre Corporation (Events East Group), Innovacorp, Invest Nova Scotia, Nova Scotia Business Inc. and Tourism Nova Scotia), key partners in other levels of government, entrepreneurs, large businesses, post-secondary institutions, venture capital investors and Nova Scotians.

After reviewing the Liquid Asphalt Cement Storage Facility Project Environmental Assessment Registration Document, the proposed project was deemed to be consistent with the mandate of the Department of Business.

From: [McKenna, Chuck W](#)
To: [Higgins, Jeremy W](#)
Cc: [Brufatto, Matthew](#); [Baxter, Brent K](#); [Parker, Maylia Kempt](#)
Subject: Asphalt - additional comment from RMU
Date: May 28, 2020 12:49:00 PM

“If a release of substance in excess of applicable legislation or regulations occurs during the construction, operation or reclamation of the facility; the Department must be notified. Likewise, if contamination is encountered at any time during the construction, operation or reclamation of the facility; the Contaminated Sites Regulations must be followed.”



Lands and Forestry

MEMORANDUM

TO: Jeremy W. Higgins, NS Department of Environment
FROM: Department of Lands and Forestry
DATE: May 29, 2020
RE: Liquid Asphalt Storage Facility, General Liquids Canada

The Department of Lands and Forestry (Department) provides the following comments on the above project:

Crown Lands:

This project is not on Crown lands and would not require any approvals/authorities from the Land Administration Division of the Department of Lands and Forestry.

Wildlife, Wildlife Habitat and Surveys:

The Department is not anticipating that there will be significant impacts regarding:

- **Species at Risk/Significant Wildlife Habitat:**
There are no listed occurrences for Species at Risk within the proposed footprint and there are no areas within the proposed footprint listed as Significant Wildlife Habitat in the *NS Significant Species and Habitat Database*.
- **Migratory or At-Risk shorebirds:**
This site is not recorded as known breeding habitat for migratory or At-Risk shorebirds or waterfowl. Industrial lighting is already present adjacent to the site and it is not expected that any additional lighting at the site would negatively impact migrating birds.
- **Flora and Fauna/Habitat:**
Given the past and existing industrial activity in and around the site, the Department of Lands and Forestry does not anticipate significant impacts on flora and fauna nor their habitat from the proposed activity.

The Department recommends that the proponent be advised that although significant impacts on wildlife and wildlife habitat are not anticipated, they have responsibilities under federal and provincial legislation and regulations:

- It is the responsibility of the proponent to ensure compliance with federal and provincial legislation and regulations regarding resident, migratory, and at-risk species and their habitats (*Species at Risk Act, Canadian Migratory Bird Convention Act, Fisheries Act, NS Endangered Species Act, NS Wildlife Act, and their regulations*).
- Should nesting birds or their young, or any species-at-risk, be encountered on site during construction the proponent must contact a Species at Risk Biologist, Wildlife Division, Nova Scotia Department of Lands and Forestry to discuss immediate actions and mitigation.

Environment

Date: May 29, 2020

To: Environmental Assessment Branch, Nova Scotia Environment

From: Climate Change Unit

Subject: Liquid Asphalt Storage Terminal, Project

Greenhouse Gas Mitigation

The proponent identifies the main sources of greenhouse emissions for the construction and operation phase of the terminal. Estimates of greenhouse gas emissions, during the construction phase, were not quantified. It is however expected that the emissions associated with the construction phase will be low. Measures to reduce the greenhouse gas emissions for the heavy construction equipment and mobile equipment through proper maintenance were highlighted.

Information on the emission performance of boilers for different fuels to be used during operations has been provided. The proponent does not provide direct estimates for all greenhouse gas emissions however, for the scope of this project, the estimated carbon dioxide performance is a good estimate in the absence of actual emission measurements.

It is expected that the emissions associated with the construction and operation will be low and will be captured by the reports of fuel supplier emitters under the Nova Scotia Greenhouse Gas Quantification Reporting Verification regulations.

Climate Change Adaptation

The proponent should consider including climate change projections and impacts on the project and relevant valued environmental components with sensitivities to climate change. The proponent should look to the following source for guidance: Nova Scotia Environment's *Guide to Considering Climate Change in Environmental Assessment in Nova Scotia* for guidance. The guide is available at <https://novascotia.ca/nse/ea/docs/EA.Climate.Change.Guide.pdf>

We advise that in analysis, the proponent should consider not only historical and present conditions, but projected climate conditions as well. The climate projection data

available on Nova Scotia Environment Climate Change Unit's website can be used in making projections and anticipating future changes.



Suite 200
1801 Hollis Street
Halifax NS B3J 3N4

Bureau 200
1801 rue Hollis
Halifax, NE B3J 3N4

Date: May 29, 2020

To: Jeremy Higgins, Environmental Assessment Officer, Nova Scotia Environment

From: Emily Gregus, Environmental Assessment Officer, Impact Assessment Agency of Canada

Subject: Liquid Asphalt Storage Facility

The federal environmental assessment process is set out in the [Impact Assessment Act](#) (IAA). The [Physical Activities Regulations](#) (the Regulations) under IAA set out a list of physical activities considered to be “designated projects.” For designated projects listed in the Regulations, the proponent must provide the Agency with an Initial Description of a Designated Project that includes information prescribed by applicable regulations ([Information and Management of Time Limits Regulations](#)).

The relevant entry in the Regulations for this type of project is:

37. The construction, operation, decommissioning and abandonment of one of the following...

(e) a new petroleum storage facility with a storage capacity of 500 000 m³ or more

Based on the information submitted to the Province of Nova Scotia on the proposed Liquid Asphalt Storage Facility, it does not appear to be described in the Regulations. Under such circumstances the proponent would not be required to submit an Initial Description of a Designated Project to the Agency. However, the proponent is advised to review the Regulations and contact the Agency if, in its view, the Regulations may apply to the proposed project.

The proponent is advised that under section 9(1) of the IAA, the Minister may, on request or on his or her own initiative, by order, designate a physical activity that is not prescribed by regulations made under paragraph 109(b) if, in his or her opinion, either the carrying out of that physical activity may cause adverse effects within federal jurisdiction or adverse direct or incidental effects, or public concerns related to those effects warrant the designation. Should the Agency receive a request for a project to be designated, the Agency would contact the proponent with further information.

The proposed project may be subject to sections 82-91 of IAA. Section 82 requires that, for any project occurring on federal lands, the federal authority responsible for administering those lands or for exercising any power to enable the project to proceed must make a determination regarding the significance of environmental effects of the project. The Agency is not involved in

this process; it is the responsibility of the federal authority to make and document this determination.

The proponent is encouraged to contact the Agency at (902) 426-0564 if it has additional information that may be relevant to the Agency or if it has any questions or concerns related to the above matters.

Thank you,

Emily Gregus
Environmental Assessment Officer, Atlantic Regional Office
Impact Assessment Agency of Canada / Government of Canada
Emily.Gregus@canada.ca / Tel: 902-229-7825

Agente d'évaluation environnementale, région de l'Atlantique
Agence d'évaluation d'impact du Canada / Gouvernement du Canada
Emily.Gregus@canada.ca/ Tél. : 902-229-7825

NS Environment

May 27, 2020

Attn: Jeremy Higgins, Environmental Assessment Officer
Nova Scotia Environment
Suite 2085 1903 Barrington St
Halifax, NS

RE: NSTIR Comments on the Liquid Asphalt Storage Facility Project Environmental Assessment (EA)

TIR staff have reviewed the Environmental Assessment for the General Liquids Canada, Liquid Asphalt Storage Facility Project and prepared the following:

The proponent is proposing to build a facility for the purpose of receiving, storing and preparing for transport of asphalt cement, on a property bordering on Pleasant Street in Dartmouth, with some small impacts on some surrounding properties, including a rail line property.

1. There does not appear to any impacts which we would need to comment on from a TIR road perspective (ie. Highway 111) with respect to provincially owned roads. Regionally, truck traffic will be expected to drop as the cement will be transported by barge to the facility and by truck to destinations across the province. However, any impacts to the rail line would need to addressed with the CNR. The main impacts would be to HRM infrastructure and marine issues, and to neighbouring properties; however, the proponent has identified communication with these stakeholders for any impacts and mitigation.
2. A reference is made to the potentiality of vehicle accidents in Section 10.2.4 and section 10.3.4 when the facility is under construction. Vehicular accidents may occur at any time, not just when the facility is being constructed. The possibility of vehicle accidents is mentioned, however the mitigation or plan for what should be done was not addressed and should be identified and expanded upon as needed.
3. Since typical asphalt tanker trucking is identified as the main means of transport, there should not be any requirement for a Special Moves or Working Within the Highway Right Of Way Permit, with regards to any provincially owned roads. The proponent has also indicated they will comply with any spring weight restrictions if applicable.
4. Dangerous Goods transportation and adherence to regulations have also been identified, so there should be no issues there as well.

Thank you for the opportunity to review and comment this document.

Sincerely,



for

Rebecca MacQuarrie
Environmental Analyst

Date: May 29, 2020

To: Jeremy Higgins
Environmental Assessment Officer

Cc: Manager, Water Resources Management Unit

From: Senior Hydrogeologist, Sustainability and Applied Science Division

Subject: Dartmouth Liquid Asphalt Storage Project

Environmental Assessment (EA) reviews from the NSE Sustainability and Applied Science Division Senior Hydrogeologist focus primarily on groundwater resources. This includes the potential for the proposed undertaking/project to adversely affect groundwater resources, including general groundwater quality, quantity, municipal water supplies, local water supply wells and groundwater contributions to stream baseflow, groundwater recharge and wetlands. The review is conducted of materials provided by the proponent during the EA registration process. Any recommendations made are based on this review.

The purpose of the proposed undertaking is to operate a facility that will be used for transferring, storing and preparing for the shipment of asphalt cement. The undertaking is at a commercial/industrial property, located at 750 Pleasant Street in Dartmouth, Nova Scotia. The proponent is General Liquids Canada (GLC), which is a member of the Municipal Group of Companies.

The undertaking proposed is described as taking place on a previously disturbed industrial site. The main proposed site is Parcel Identification Number (PID) 00260703. Additional properties affected are Cherubini Metal Works Ltd.: PID 40268849, Canadian National Railway: PID 00643238, and GLC property: PID 41464280.

As proposed by the proponent:

“The construction phase of the project will generally consist of earthworks (primarily grading), and construction of a new facility and ancillary components.

There is an existing storage tank at the site that will be inspected and repaired in order to be repurposed as an asphalt storage tank. The completed facility will generally consist of a large storage tank (existing), two new storage tanks (21 and 30 m diameter), a series of indoor asphalt storage tanks, a hot oil heating unit (to keep

the asphalt cement in liquid form), two boilers and loading racks to load tanker trucks, an AC pipeline (aboveground), a building, loading area and access road with parking area.

General operational activities will include AC being piped from a barge to a main storage tank at the facility, where it is then held in a heated storage tank, kept heated and finally prepared for transport off site by truck. Storage and transfer of product is conducted through the use of tanks, pipes and pumps which does not allow for uncontrolled emission of gas, vapours or objectionable odour.

The proposed undertaking is a transfer and storage facility only and there will be no production of AC or other products at the site. Decommissioning will occur according to regulations at the time but the site and project is anticipated and designed to be in operation for at least 25 years.” (page 4 of the Registration document).

The proposed activity as described will include:

- Above ground asphalt cement heated storage tanks (large), both outdoor (3) and indoor (8)
- Total outdoor storage capacity approximately 21 million litres
- Total indoor storage capacity approximately 440,000 litres
- Hot oil heating unit
- Two boilers
- Fuel needs supplied by natural gas
- Truck loading racks
- Above ground asphalt cement heated pipeline from marine wharf facility to storage tanks
- Operational building
- Loading area and access road
- Berm construction around project perimeter
- Surface water drainage design and construction

Comments

The Dartmouth Liquid Asphalt Storage registration document

- The location of the undertaking is not within a municipal drinking water Source Water Protection zone, drinking water Watershed or Wellfield Protection Area (WHPA) or a regulated Protected Water Area. The nearest Protected Water Area is the Lake Major Watershed which is about 9 km north of the site. In addition, Municipal Drinking Water Watersheds (Lake Lamont/Topsail Lake and Collin’s Park/Shubenacadie River Watershed) are also to the north, about 6 km away.
- The nearest Source Water Protection Area (Groundwater) is for the Halifax Water Silver Sands Municipal water supply about 6 km to the east.

- The nearest Public Registered Drinking Water Supply (drilled well) is located about 6.75 km north of the project site at the Lake Loon Golf Center Ltd.
- The Nova Scotia Environment Well Logs Database (WLB) (as accessed through the Natural Resources Nova Scotia Groundwater Atlas interactive map) locates 8 (eight) drilled water wells within about a 2 km radius of the central point of the project area.

However, it has been noted previously that the Well Logs Database Records and any mapping based on these records need to be considered in terms of locational errors/accuracy of the original data. In addition, the Well Logs Database does not contain a complete listing of every water supply well in the province and some areas may contain water supply wells not reported. Field truthing and field surveys for actual water supply well locations would be needed for verification.

- The well records for the above 8 drilled wells (within 2 km) show installation dates ranging between 1945-1984. It is uncertain if the wells identified above are still in operation, or not, given the availability of potable water now in this area of Dartmouth. The well locations are along the harbour shore, cross-gradient to the site. The nearest of these potential wells is about 900 metres to the northwest, at the former Imperial Oil site. It is very unlikely to be affected by any of the proposed site activities.
- Groundwater environmental monitoring results for the site were not provided. The document does indicate that some previous environmental site assessment was done nearby by others. However, it is not clear if the work was on the exact location of the activity proposed. The proponent indicates that conditions meet relevant Tier 1 EQS for the site, but no other documentation is provided.
- Valued Environmental Components (VECs) for the site are summarized and discussed by the proponent in Table 3 Project VEC Scoping, page 45 of the Registration Document. Groundwater is determined by the proponent to not be a VEC for the proposed activity at this location.
- Liquid chemicals to be used or stored at the site are described in the document as asphalt cement, Paratherm heat transfer mineral oil and petroleum hydrocarbons (vehicle use). The main product, asphalt cement, requires to be heated in order to flow and is considered relatively immobile in the natural environment. In addition, the chemical aqueous solubility of asphalt cement or its components is extremely low and therefore asphalt cement is very unlikely to affect groundwater in general.

The other chemical products – a mineral oil as a heat transfer fluid and petroleum hydrocarbons (gas/diesel) could have some concerns if released into groundwater from a human health drinking water pathway, or for groundwater discharge to surface water/marine water. However, potable water supplies are available for the area and groundwater use for drinking water is not expected. The volume use/storage for Paratherm is described a 4.2 m³ (42,000 litres). Substantial spills/releases of Paratherm could be of some concern. There are no surface watercourses identified on the site and thus the only other potential environmental

direct exposure for groundwater is via marine discharge to the harbour waters. Indirect exposure via an on-site vapour inhalation pathway is possible and could be relevant for site workers in the event of any releases. However, this depends very much on the material released, its volatility and exposure criteria. Any spills or releases of chemicals should be assessed and managed using provincial legislation, including the NS *Contaminated Sites Regulations*.

Recommendations

The following recommendations are suggested for the proposed Dartmouth Liquid Asphalt Storage Project based on the groundwater effects environmental assessment review:

Planning/Design Issues of Significant Importance

None identified.

Operational Issues/Other Permitting Processes

None identified

Other Observations

This review is based on descriptions of the proposed activity as provided in the registration document. In the document, the storage or use of liquid chemicals/fuels appears to be limited to asphalt cement, Paratherm heat transfer mineral oil and petroleum hydrocarbons used in vehicles. Should any other chemicals be used or stored at the site, the results of this groundwater review may need to be revised.

The conclusion that groundwater is not considered a VEC for the purposes of this activity, at this location, is currently agreed with by this reviewer, based on the information provided and other sources reviewed. However, potential impacts to groundwater and related exposure routes/pathways from these chemicals, if released into the environment, may still require assessment and remediation following the Nova Scotia *Contaminated Sites Regulations*.

It may be prudent for the project proponent to design and install a minimal, industry-standard shallow groundwater monitoring network at the site.

Date: May 29, 2020
To: Jeremy Higgins, Nova Scotia Environment
From: Nova Scotia Office of Aboriginal Affairs
Subject: Liquid Asphalt Storage Facility Project

The Nova Scotia Office of Aboriginal Affairs (OAA) has reviewed the Environmental Assessment Registration Document for the proposed Liquid Asphalt Storage Facility Project, submitted by General Liquids Canada on May 1, 2020. OAA's review considered whether the information provided would assist the Province in assessing the potential of the proposed project to adversely impact established and/or asserted Mi'kmaw Aboriginal and Treaty rights.

At this time, OAA has no further comments.



Ecosystem Management
1 Challenger Drive
PO Box 1006, P500
Dartmouth, NS
B2Y 4A2

May 29, 2020

Our file Notre référence

20-HMAR-00181

Jeremy Higgins
Nova Scotia Environment
1903 Barrington Street, Suite 2085
Halifax, NS
B3J 2P8

**Subject: General Liquids Canada Liquid Asphalt Storage Facility Project –
Environmental Assessment Registration Document**

Dear Mr. Higgins:

It is our understanding that on May 1, 2020, General Liquids Canada, the Municipal Group of Companies, registered the Liquid Asphalt Storage Facility project for environmental assessment in accordance with Part IV of the *Environment Act*. The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received a request from Nova Scotia Environment on April 27, 2020 to provide comment on the Environmental Assessment Registration Document (EARD) for the aforementioned project. Based on our review of the EARD, please consider the following comments:

Section 9.2.2.1 – Surface Water Resources (Marine)

- A key mitigation measure outlined within Section 9.2.2.1 to prevent erosion and sediment impacts to Halifax Harbour is the construction of a soil containment berm. The Program recommends that the soil containment berm be covered using biodegradable erosion and sediment control materials to mitigate the possibility of the berm becoming a source of sediment itself.

Section 12.0 – Cumulative Impacts

- The Cumulative Impacts Section does not properly explain how the proponent reached the conclusion that no significant cumulative impacts are likely for the project. The proponent failed to discuss the impacts of projects within the vicinity of the Liquid Asphalt Storage Facility, which are ongoing or likely to occur in the future and have the potential to interact with the effects of the asphalt facility in a

cumulative manner. The Program recommends that the proponent refer to available guidance documents for assessing cumulative environmental effects and apply their findings to Section 12.0.

General

- To avoid and mitigate the potential for prohibited effects to fish and fish habitat, the Program recommends implementing the measures found on the following website: <https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html>.

The EARD has been reviewed to determine whether the proponent's proposal is likely to result in:

- the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat which are prohibited under subsections 34.4(1) and 35(1) of the *Fisheries Act*; and
- effects to listed aquatic species at risk, any part of their critical habitat or the residences of their individuals in a manner which is prohibited under sections 32, 33 and subsection 58(1) of the *Species at Risk Act*.

The aforementioned outcomes are prohibited unless authorized under their respective legislation and regulations.

Based on the information provided, it is our understanding that the proposed work, undertakings, or activities are not located in fish habitat. Provided that the proponent can implement the abovementioned measures to protect fish and fish habitat, further review pursuant to the *Fisheries Act* and *Species at Risk Act*, as listed above, may not be required.

Should the proponent's plans change or if they have omitted any information in their proposal, further review by the Program may be required. It remains the proponent's responsibility to remain in compliance with the *Fisheries Act*, the *Species at Risk Act* and the *Aquatic Invasive Species Regulations*.

It is also the proponent's *Duty to Notify* DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat. Such notifications should be directed to (<http://www.dfo-mpo.gc.ca/pnw-ppe/contact-eng.html>).

It remains the proponent's responsibility to meet all other federal, territorial, provincial and municipal requirements that apply to their proposal.

If you or the proponent have any questions with the content of this letter, please contact Sean Wilson at our Dartmouth office at 902-499-6397 or by email at Sean.Wilson@dfo-mpo.gc.ca. Please refer to the file number referenced above when corresponding with the Program.

Yours sincerely,

A handwritten signature in black ink that reads "Matthew Baker". The signature is written in a cursive style with a large, prominent initial "M".

Matthew Baker
A/ Senior Regulatory Review Biologist
Fish and Fish Habitat Protection Program
Maritimes Region

Environment

Date: April 5, 2020
To: Jeremy Higgins, Environmental Assessment Officer
From: Environmental Health
Subject: Liquid Asphalt Storage Facility Project

Scope of review:

The focus of this Environmental Assessment review from the NSE Sustainability and Applied Science Division's Regional Environmental Health Consultant is potential impacts on human health. In general, the scope of this review includes the assessment of the potential for the proposed undertaking/project to adversely affect human health in all phases of the project. Any recommendations provided below are meant to supplement the actions that are outlined in the EA submission documents.

Documents reviewed:

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

- Environmental Assessment Registration Document – Liquid Asphalt Storage Facility Project. Including Appendices. Report Prepared by DILLON CONSULTING LIMITED. Registered on May 1, 2020, and accessed from <https://novascotia.ca/nse/ea/Liquid-Asphalt-Storage-Facility-Project/default.asp>

Noise

The report states that the proponent will mitigate noise issues via the -Utilization of construction scheduling restrictions, where possible (or alternative mitigation implemented), to ensure construction activities with elevated noise emissions occur only during the day;

However, the proponent does not describe the alternative mitigation measures.

Given the expected increase in noise levels combined with the proximity to residential properties (less than 150m), it is recommended as a condition of approval that routine noise monitoring be implemented at commencement of the construction phase. Monitoring should extend into the operation phase to ensure ongoing operations on the site will be within noise level limits.

Air Quality

The proponent discusses that there will be mitigations in place for odour (activated carbon filters). The report does not discuss any practices for monitoring the efficacy of these measures. The report does not speak to additional measures that may be taken if the mitigation measures are inadequate.

The report does not speak to the potential for generation of any fugitive gasses including hydrogen sulfide, nor does it speak to any plan to manage or monitor.

Groundwater

The proponent does not discuss in any detail the hydrology of the area. There is no discussion of the potential for groundwater contamination during routine operations, or in the event of a significant release or spill. The report does however state that there are currently no groundwater users present in the "area" however the area is not defined

Based on the information provided it has been determined that there is inadequate information to perform a comprehensive review of all/any potential health hazards associated with this project.

Environment

Date: May 30, 2020
To: Environmental Assessment Officer
From: Sr. Water Resources Engineer, Water Resources Management Unit
Subject: Liquid Asphalt Storage Facility, Dartmouth

Scope of review:

This review is intended for use by the Environmental Assessment (EA) Officer. The role of the Sr. Water Resources Engineer with NSE Sustainability and Applied Science Division is to consider the proposed undertaking's potential for negative environmental impacts and any proposed mitigations with respect to surface water quantity and management. The review is based on materials provided by the proponent during EA registration process.

Any recommendations provided below are meant to supplement the actions outlined in the submission documents.

Documents reviewed:

- Registration Document for a Class 1 Undertaking for a Liquid Asphalt Storage Facility and Terminal, submitted by Dexter Construction Company Limited (February 2020).

Comments

General to the Project

- General Liquids Canada proposes to construct and operate an asphalt cement storage facility with 8 million litres of storage capacity, with future expansion of an addition 13 million litres of storage capacity, and associated building infrastructure at an industrial zoned property in Dartmouth, Nova Scotia, adjacent to Halifax Harbour.
- The facility proposed intends to utilize an existing tank as part of the infrastructure for asphalt cement storage. Inspection is proposed to assess whether the existing tank condition is adequate for project use. There is no discussion of Project alternatives if the existing tank is assessed as inadequate
- Two new outdoor steel storage tanks are proposed to be constructed in the future at an unspecified date and unspecified storage volumes with diameters of 21 and 30 m.

- Eight above ground 55,000 L volume steel storage tanks are proposed to be constructed inside the building for asphalt storage. No batch mixing or use of chemical additives with the stored and transferred asphalt cement is proposed in the EA Registration Document.
- All tanks are proposed to be heated using a closed-loop hot oil system. There is no discussion of managing upset conditions (e.g., heating system shutdown) and whether solvents or other chemical additives would be added to the tank system to allow asphalt cement to be removed, in particular hardened product.
- It is noted that the use of facility is to be assessed with operations for at least the next 25 years, with no plans for decommissioning or reclamation submitted.
- The facility will receive asphalt cement via an above ground pipeline from an existing marine wharf that will connect to a barge. The product will be shipped off-site via asphalt trucks. During transfer of asphalt cement from barge to tank, the tank(s) will be monitored visually for leaks or spills.

Surface Water

- There are no mapped watercourses located within the Project area based on NS topographic database mapping. Existing mapping indicates that the site overland flows from precipitation are directed to Halifax Harbour.
- A soil berm is described to be constructed around the site to provide additional containment for potential releases (Section 5 and Section 10). Appendix A shows only a dashed line labeled 'swale' to be located adjacent to the existing asphalt cement storage tank. No further characterization of the swale is provided, nor does it surround the site or divert water from overland flow directly into the Harbour.
- A surface water drainage system is identified at the east boundary of the property. Appendix A, Sheet 1 and 2 indicate that there is a 10" diameter PVC pipe that discharges into Halifax Harbour. No details are provided on the stormwater management planning indicating capacity in this system to receive additional outflows from site regrading. Confirm that access to this system has been provided by the owner if it is not owned and maintained by the proponent.
- The proposed surface water management system is described in text (Section 5) as diverting surface runoff to an oil water separator. Drawings provided in Appendices A and B do not show the installation of the oil water separator, nor information on site grading such that it can be confirmed that one unit will function to manage flows for the entire site.
- An 'environmental catchbasin' is shown on Drawings. Discharge of that catchbasin within any stormwater management system is not described in the EARD, nor explained in Drawings.
- The EARD states that asphalt spills or leaks would harden within several meters and it is not feasible for asphalt to reach Halifax Harbour (Section 5). Justification for this position is not provided for catastrophic failures of the large storage tank of 8 million L of heated asphalt cement, nor the risk of failure and the proximity of the marine pipeline proposed to transport up to 750,000 L/hour of asphalt cement. Maintenance programs and operational pressure restrictions in Section 5 are acknowledged.

Recommendations:

Insufficient information is provided to assess the impact of the proposed undertaking on surface water quantity and management. Therefore, the following recommendations are made:

- The project scope be limited to the project description in EA Registration Document. Alternatively, the proponent should consider providing clarification on the presence of additional chemicals to be stored on site and provide environmental planning and management information accordingly.
- Additional information be provided as to how far asphalt cement leaks or catastrophic failures of the large storage tank and operating pipeline would travel. This information would then be used to assess surface water management plans.
- Completed site plans delineating and fully characterizing the described containment berm, oil water separator, and all stormwater management infrastructure should be provided to NSE for review and acceptance in advance of construction.
- Completed details of surface water (stormwater) management infrastructure and shall be designed by a qualified professional and provided to NSE.
- Provide confirmation that site outfall of surface water runoff management system, is to existing infrastructure, including ability of the existing infrastructure / ditches receive site runoff, agreement with infrastructure owner for use, and that the ultimate outlet is the Halifax Harbour.
- An erosion and sediment control plan for construction should be developed by a qualified professional and submitted for NSE review and approval prior to the start of construction and operation activities.
- A surface water quality monitoring program is recommended to address the information gaps in the EARD. This program should be developed and be submitted to NSE for review and approval prior to the start of construction of the proposed facility.
- Surface water management and mitigations shall be considered during future decommissioning. These considerations and plans shall be included in the proponent's plans submitted to NSE at the time of closure.

Date: May 31, 2020

To: Manager, Water Management Unit

From: Senior Surface Water Quality Specialist, Water Management Unit

Subject: Liquid Asphalt Storage Facility (Dartmouth) Environmental Assessment
Registration Document – Review Comments & Recommendations

Scope of Review

As Senior Surface Water Quality Specialist with the Nova Scotia Environment (NSE) Sustainability and Applied Science Division, the following Liquid Asphalt Storage Facility (Dartmouth) Environmental Assessment (EA) review focuses on the following subjects:

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

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

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

Reviewed Documents

The following document was the basis for this EA review:

Dillon Consulting. 2020. *Environmental Assessment Registration Document. Liquid Asphalt Storage Facility, Dartmouth, Nova Scotia*. General Liquids Canada, The Municipal Group of Companies.

Comments

General

- General Liquids Canada is proposing to construct and operate an asphalt cement storage facility with up to 13 million litres of storage capacity and associated building infrastructure at an industrial zoned property in Dartmouth, Nova Scotia, adjacent to Halifax Harbour.
- The Facility plans use an existing steel tank for asphalt cement storage with a

proposed working storage capacity of 8 million litres. There are no details provided in the EA Registration Document with respect to its historic use, design, whether it contains a heating apparatus and evaluation of appropriateness for use for the Project. An inspection is proposed to assess whether the existing tank condition is adequate for project use following an API standard. There is no discussion of Project alternatives if the existing tank is assessed as inadequate with repair and/or reconfiguration.

- The existing tank could have stored, prior to this Project, hydrocarbon products and/or other potential contaminants of concern. Repair and/or reconfiguration of the tank during construction could potentially cause unintentional releases of potential contaminants into adjacent soil, surface water and groundwater systems, which would potentially cause an environmental effect.
- Two new outdoor steel storage tanks are proposed to be constructed in the future at an unspecified date and unspecified storage volumes with diameters of 21 and 30 m.
- Eight above ground 55,000 L volume steel storage tanks are proposed to be constructed inside a building. Given that the design of the facility is for storage and transfer to haul trucks, no explanation is provided as to why these small tanks are required for the project and not an equivalent large tank or tanks as is proposed elsewhere on the site. No use of chemical additives with the stored and transferred asphalt cement as part of batch mixing is proposed in the EA Registration Document.
- The facility plans to receive asphalt cement via a pipeline from an existing marine wharf that connects to a barge. The product is proposed to be shipped off-site via asphalt trucks.
 - The pipeline to transfer product from the wharf is proposed to be an above ground 8" steel pipe with weatherproof insulating blankets and an electric trace. It is assumed by the reader that the electric trace is to heat the pipeline during winter periods.
 - During transfer of asphalt cement from barge to tank, the tank(s) are proposed to be monitored visually for leaks or spills.
- All tanks are proposed to be heated using a closed-loop hot oil system using a mineral-oil based fluid, Paratherm NF.
 - There is no discussion within the EA Registration Document on managing upset conditions (e.g., heating system shutdown) and whether solvents or other chemical additives would be added to the tank system to remobilize hardened product.

Surface Water Resources

- There are no mapped watercourses located within the Project area, and existing site drainage is directed to Halifax Harbour, based on NS topographic database mapping.
- An undefined surface water drainage system is identified along the east boundary of the property. Appendix A, Drawing GTS-1645, Sheets 1 and 2 indicate that there is a 10" diameter PVC pipe that appears to discharge into Halifax Harbour as part of this system. No details are provided on who owns, operates and maintains this surface water drainage system and how it will be connected to the proposed surface water management system for the Project area. Insufficient information is provided
- A soil berm is proposed to be constructed around the site as part of the surface

water management system and to contain potential unintentional releases from Project tanks and piping (Section 10.3.3.1). No details are provided in the EA Registration Document with respect to design or design criteria with respect to berm sizing, locations, soil type, soil stabilization and associated drainage management. Providing conceptual design criteria would assist with assessing whether the capturing and management of surface water runoff is technically feasible for the Project area and the effectiveness of the mitigation measure in managing an unintentional release event and/or surface water runoff storm event.

- The following Project design drawings detail surface water management infrastructure features:
 - Appendix B, Drawing GTS-1645, Sheet 3 indicates sumps and a floor trench to be installed to capture liquids. There are no details provided on how collected liquids will be managed and disposed of/discharged in the EA Registration Document.
 - The loading rack proposed in Appendix B, Drawing GTS-1645, Sheet 4 and Appendix A, Drawing GTS-1645, Sheets 1 and 2 identify an environmental catch basin within the footing. Where that catchbasin connects to or how within the proposed stormwater management system is not identified in the EA Registration Document.

As vehicular traffic and long-term storage/transfer of asphalt cement and heat transfer mineral-oil fluids are all part of the Project, how potentially hydrocarbon impacted liquids, including surface water runoff, will be captured and managed at the Site is important for assessing potential environmental effects and development and incorporation of appropriate mitigation measures. whether contaminants of concern will be transported into nearby surface water features and their potential environmental effects.

- Appendix A, Drawing GTS-1645, Sheets 1 and 2 indicate a proposed or existing swale located adjacent to the existing asphalt cement storage tank that is appears to be directed towards an existing catchbasin. The EA Registration Document does not explicitly indicate if this catchbasin connects to the 10” diameter PVC pipe that appears to discharge into Halifax Harbour. How surface water discharge is managed in this swale is important for assessing potential environmental effects and adequacy of mitigation measures.

Surface Water Quality

- Asphalt cement transfer piping from the barge to the tanks is not proposed to include automated discharge detection, which is assumed by the reader to include leak detection. Visual inspection is proposed to be conducted hourly during active transfer pipe operation periods.
- Overfill protection proposed for truck loading rack, which has a single loading bay along with emergency shut-off switches to prevent contaminant discharges into surrounding waters and soils.
- No chemicals, besides asphalt cement, vehicle fuels and lubricants, and Paratherm are proposed to be used or added to the asphalt cement in storage at the facility. Section 10.2.1 indicates during operation of the facility there is potential of releasing chemicals from the operation but does not list the chemical names.

- Facility staff are proposed to be trained in spill response via internal and external resources via a third-party and have developed an oil pollution prevention plan to be reviewed by Transport Canada (Appendix H).
- Section 10.3.3.1 indicates that asphalt spills or leaks would harden in a very short period of time and would not feasibly reach Halifax Harbour. However, the largest storage tank is proposed to store up to 8,000,00 L of heated asphalt cement and the marine pipeline is proposed to transport up to 750,000 L/hour of asphalt cement. No information is provided as to how far asphalt cement leaks or catastrophic failures of the tanks and pipelines would be transported on land surfaces. The environmental effects and appropriateness of mitigation measures are not evaluated for major leak and/or catastrophic failure scenarios within the Project area.
- The surface water management system proposes to use an oil water separator to treat surface water runoff. The Drawings provided in Appendices A and B do not indicate where the oil water separator will be located within the surface water management system. No details are provided on the existing or proposed site grading to confirm that all surface water runoff can be directed to drain into the oil water separator prior to off-site discharge.
- The surface water/stormwater management system is proposed to "...include a valve to isolate flow from the surface water system during asphalt cement loading and unloading activities." (Section 9.2.2.1). The statement is confusing in that it is unclear whether the whole surface water management system will be isolated prior to discharging using this valve or a portion of the surface water management system will have an isolation valve. The section indicates that the spill would be adequately cleaned up prior to opening the valve. The EA Registration Document does not indicate whether the valve will be automatic or manually operated, and if a management plan developed to determine when it is appropriate to open the valve and release collected surface water. Also no details are provided on how clean up will be conducted and what criteria will be used to identify when water is allowed to flow again in the system.
- Spill containment is proposed to hold a minimum of 10% of the total storage volume, including primary and secondary containment areas (Section 9.0, Table 3). This information is not reiterated elsewhere in the EA Registration Document. No details are provided on whether there are additional containment measures in addition to the sump as part of the truck loading/unloading area and the soil berms to be constructed around the Site perimeter. Also no design criteria are provided on how the system will be developed to maintain the 10% storage volume.

Surface Water Quantity

- No discussion is provided related to local existing topography at the site with respect to surface water drainage.
- The proposed surface water management system indicates that the Site is to be appropriately graded to manage surface water runoff with flows diverted to an oil water separator, which includes use of perimeter soil berms. No details are provided on whether it is technically feasible to grade the property to manage all surface water runoff and discharge to the oil water separator. No details are provided with respect to the design storm event (e.g., 10-year return period) the surface water management system will be designed to manage prior overflow/spillway discharge.

Recommendations

Operational Issues/Other Permitting Processes

Surface Water Quality & Quantity

- No chemical additives are proposed to be mixed with or added to the asphalt cement or used in the maintenance of the tanks and pipelines at the Site. The storage and use of such chemical additives at the Site should not occur prior to material, process and management details being submitted to NSE staff for review to subsequently identify whether approvals or approval amendments are required.
- The existing 8,000,000 L steel tank is planned to be inspected, repaired and reconfigured for asphalt cement storage at Project commencement.
 - A repair and reconfiguration tank management plan should be submitted to NSE for review and approval that details mitigation measures for managing potential historic contaminants of concern to minimize the potential for leaks/spills during construction and operation activities.
 - If the tank is identified as inadequate for the Project, the removal and replacement of the tank should be discussed with NSE staff prior to removal activities occurring to identify potential approvals required and their application requirements.
- An erosion and sediment control plan should be developed by a qualified professional and submitted for NSE review and approval prior to the start of construction and operation activities.
- New surface water management infrastructure (e.g., catchbasins, swales, oil water separators, berms) and existing infrastructure enhancements should be design by a qualified professional to reduce sediment and hydrocarbon loading from the Site. Spill containment areas that receive surface water runoff should be included as part of the submitted design package and their storage capacities considering surface water runoff and tank storage volumes in the case of a spill event. This infrastructure should include clean water diversions (e.g., berms) to direct non-site impacted surface water runoff away from the Project area. The proposed use of an isolation valve to prevent the system from discharging during loading and unloading activities should be included along with operation details. Pre- and post-development surface water runoff rates should be considered in the design with the objective of a zero increase in peak discharge from the project development area. Outlet infrastructure should consider potential scour impacts to the receiving water environment. Final infrastructure design criteria, storm event sizing, operation and maintenance guide and effluent discharge concentration requirements should be developed and submitted to NSE staff for review and approval prior to the start of Site construction.
- A surface water quality monitoring program should be developed to monitor discharge from the surface water management system and any appropriate sumps, spill containment areas, etc. collecting liquids at the Site. The contaminants of concern to be monitored should include appropriate hydrocarbon compounds and groups associated with asphalt cement, fuels, lubricants and heat transfer fluids that are proposed to be used at the Project site. The plan should include water quality monitoring requirements if a leak or spill should occur into the surface water management system to determine if the system can be opened and discharged allowed. This plan should be submitted to NSE staff

- for review and approval prior to the start of construction of the proposed facility.
- The surface water runoff management system outfall receiving environment should be confirmed to be Halifax Harbour.



Environmental Health Program
Regulatory Operations and Regions Branch
1505 Barrington Street, Suite 1817
Halifax, NS B3J 3Y6

May 28th, 2020

Jeremy Higgins
Environmental Assessment Officer
Nova Scotia Environment
Suite 2085 1903 Barrington St
Halifax, NS

Subject: Health Canada's Response – Liquid Asphalt Storage Facility Dartmouth
Environmental Assessment Registration Document¹

Dear Mr. Higgins:

Thank you for your e-mail dated May 1st, 2020, requesting Health Canada's review of the above-mentioned Environmental Assessment (EA) Registration document¹ with respect to issues of relevance to human health. Health Canada has reviewed the document and is providing the following information with respect to receptor location(s), noise, air quality, water quality and country foods for your consideration.

Project Location and Characteristics:

The proposed project is for a Liquid Asphalt Storage Facility (the project) located at 750 Pleasant Street in Dartmouth, Nova Scotia (NS). The project consists of the construction and operation of Liquid Asphalt Storage facility. The facility that will be used for receiving, storing and preparing for the transport of asphalt cement (AC). There will be no production of AC products at the site. It is anticipated that the AC will be used in the Nova Scotia road construction industry. The primary supply of asphalt cement for the Atlantic Canadian region is from Irving Oil's refinery, located in Saint John. It is expected that 2-4 barge trips will be required annually when the project is fully operational.

The project components consist of a large storage tank (existing), two new storage tanks, multiple indoor asphalt storage tanks, a hot oil heating unit, two boilers loading racks, an pipeline (aboveground), a building, loading area and access road with parking.

¹ Dillon Consulting. Environmental Assessment Registration for the Liquid Asphalt Storage Facility Dartmouth. Prepared on behalf of Municipal Group. 2020. April

The project will use an existing industrial wharf located on the adjacent property to allow for supply of AC by barge from Saint John.

The facility proposes to operate over the next 25 years. With anticipated future operations involving the storage of 8 million liters of AC.

Receptor Location(s):

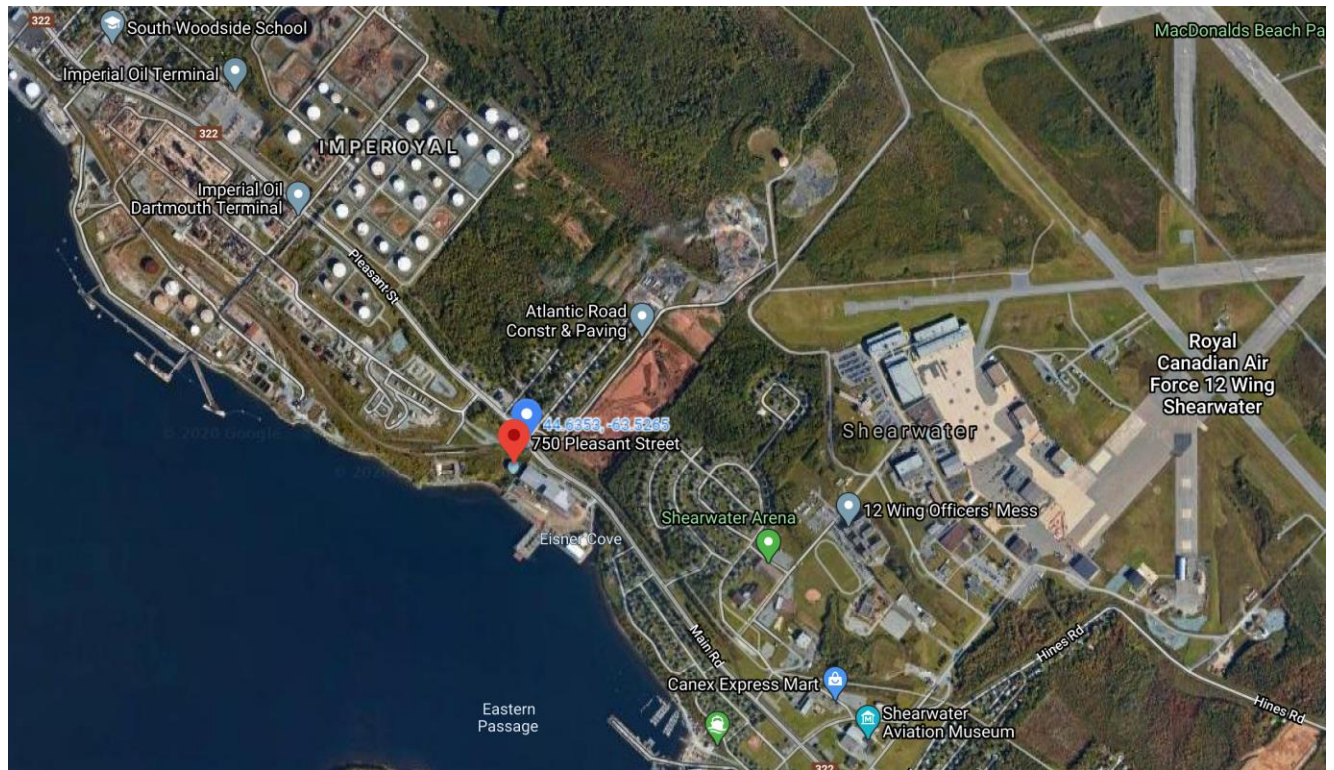
According to the report the closest residential receptor is the residential houses parallel to the project on Pleasant Street, with the nearest offsite residential receptor being 150m from the existing storage tank.

The study area includes both the existing storage tank area, the expansion property across the Canada rail tracks and the Cherubini Wharf. This is shown in Figure 2 in the report (below).



The study area including the wharf and future storage area is shown relative to nearest receptors in the Figures (below).

Figure 1: Aerial View of Site



Health Canada reviewed online satellite imagery and compared this to the maps in the registration document. There are a series of residential homes, a park and small commercial businesses directly parallel and adjacent to the study area as shown in the figures below. CFB Shearwater Military housing is 154m for the study area wharf. A park on Belmont and Pleasant streets, 125m from the main storage tank, and homes on Pleasant, Carleton and Belmont streets are 37-150m from the property boundary.

Figure 2-3: Aerial View of Site and Nearest Receptor

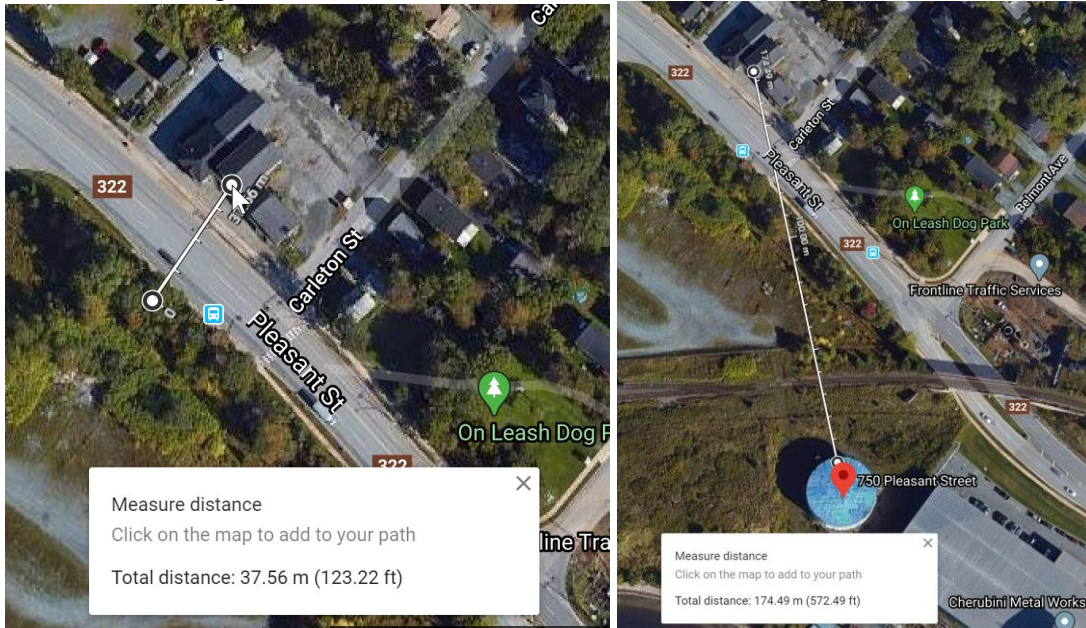


Figure 4-5: Aerial View of Site and Nearest Receptor

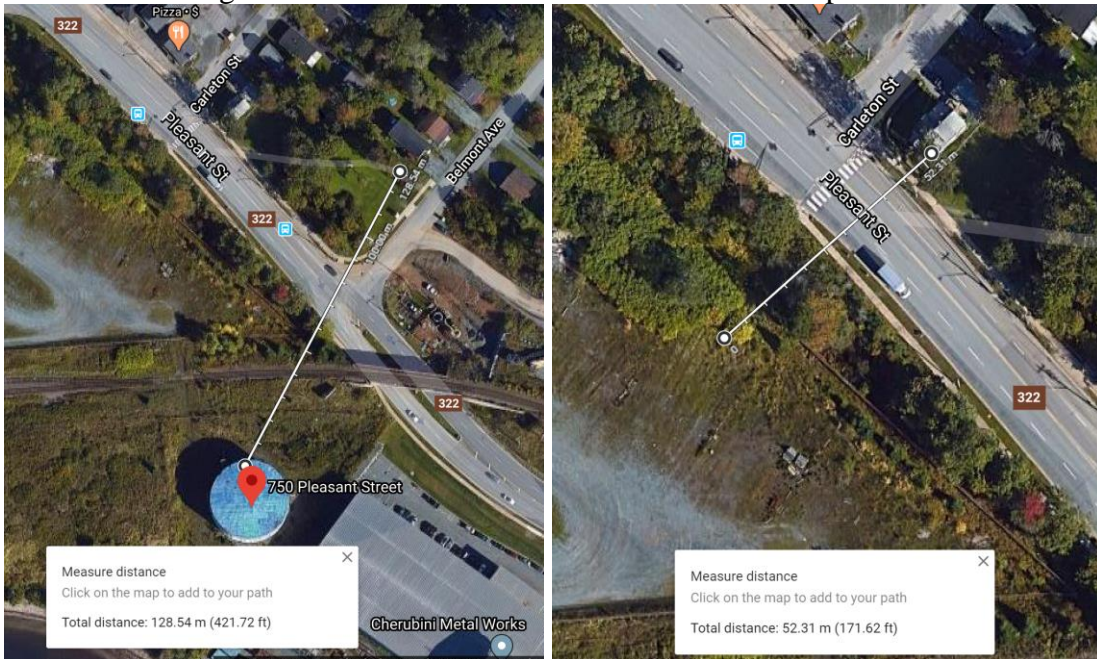
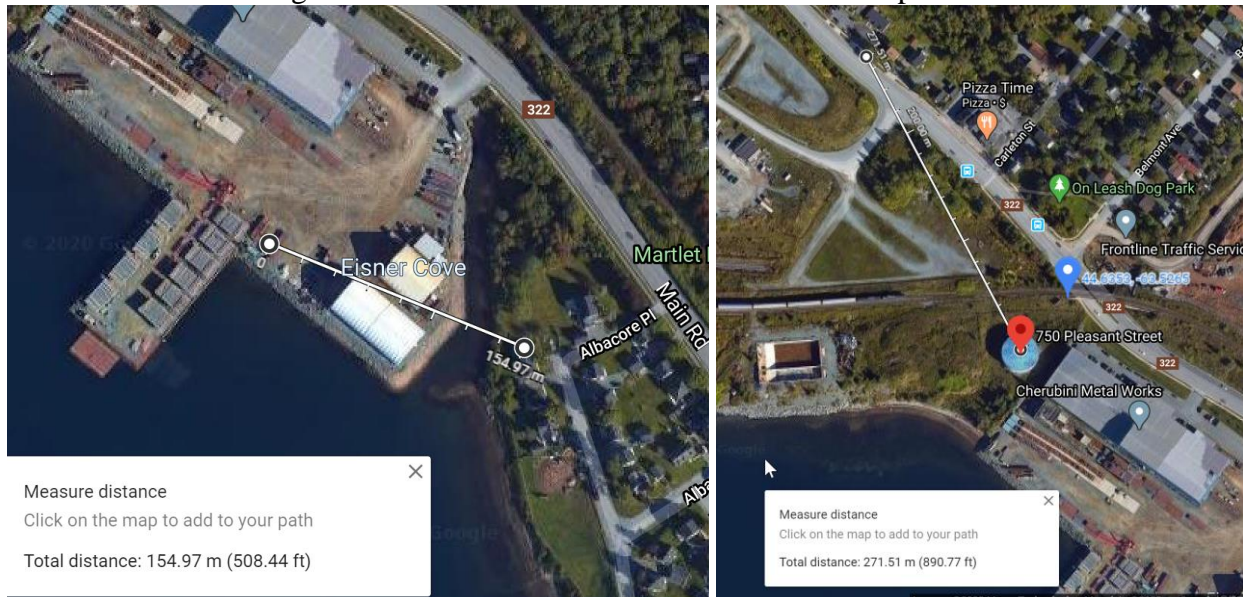


Figure 6-7: Aerial View of Site and Nearest Receptor



The report provide maps of the area, but is important to clearly describe the location and distance from the project site(s) of all potential human receptors (permanent, seasonal or temporary)—taking into consideration the different types of land uses (e.g. residential, recreational, industrial, etc.); and identifying all sensitive people (e.g. in schools, hospitals, retirement complexes or assisted care homes). Note that the types of residents and visitors in a particular area will depend on land use, and may include members of the general public and/or members of specific population subgroups (Indigenous peoples, campers, hunters, etc.)

First Nations Stakeholder Engagement:

Further, Section 6.1 states:

“In late February 2020, GLC consulted with the Nova Scotia Office of Aboriginal Affairs to help identify the appropriate Indigenous groups to engage regarding the proposed undertaking. In early March 2020, project notification letters were sent by email to the following Mi’kmaq communities and organizations:

- *Millbrook First Nation;*
- *Sipeknakaik (Shubenacadie) First Nation; and*
- *Kwilmu’kw Maw-klusuaqn Negotiation Office (KMKNO)*

To date, no First Nations have responded to the project notification letters, or demonstrated interest in the proposed undertaking.”

Section 6.0 discusses the stakeholder engagement. Although early engagement was initiated with the nearest First Nations (through provision of the Project Description and an invite to the Information Session), a response from the Mi'kmaq Community bands has not yet occurred.

- If future Mi'kmaq engagement occurs and human health issues are identified, these additional concerns may need to be addressed and additional mitigation may be required.

Public Stakeholder Engagement:

In April 2020, GLC provided project notification to both the Pleasant Woodside Neighborhood Association and the South Woodside Community Association. These associations were contacted through Facebook groups in the local area. According to the report, there has been no response from members of the Facebook groups May 2020.

There is a series of residential homes, a park and small commercial business directly parallel and adjacent to the study area. With the COVID-19 crisis there was no public information sessions, so it is unknown if nearby residents in the area are part of the Facebook pages or are aware the project is under environmental assessment review.

Public Safety:

With the storage of a large quantities of flammable liquid and a rail line intersecting the property there are industry setbacks that apply between the public (homes/roads/railway) for explosive liquids stored within the site boundaries. Flammable liquid bulk storage regulations are important in this case as railway traffic is involved in this project as the train brakes can produce sparking events when a train crosses the line.

- Health Canada recommends that the Nova Scotia Environmental Assessment Coordinator with the proponent determine if there are any applicable regulations denoting minimum separation distances between the rail lines and the flammable/explosive liquids located on the site.

Noise:

Noise can be created from multiple asphalt storage facility sources including the use of heavy equipment, hauling of material by trucks, asphalt heating equipment, and the shipping traffic. General heating operations noise and AC offsite trucking are the primary sources of noise and vibration that can act as a nuisance for adjacent residents.

Truck traffic:

In similar projects, the main acoustic concern for local residents is usually the noise created from existing and future truck traffic in the neighbourhood.

Section 5.5.1 Labour Requirements states

“during operations, the proposed project would employ five technical personnel, 24 hours per day, seven days per week during the road construction season (spring to fall). During the off season (winter), the operation will employ five people, five days per week, and 12 hours per day.”

The EA notes that truck traffic will change as a result of the project however it does not state the frequency and number of heavy haul AC trucks that will frequent the site during the road construction season.

- If heavy truck traffic does increase dramatically because of the project, especially in mornings and evenings, there may be need for further mitigation measures as there could be existing public concern about truck traffic in the busy area. Due to the proximity between receptors and the truck traffic, noise may become a concern if traffic noise reaches the neighbouring properties.

For a detailed description of Health Canada’s guidance for evaluating noise in EAs, please see the attachment.

Health Canada. 2016. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.

Air Quality and Odour:

Air Quality:

Section 5.6.1 Air Contaminant and GHG Emissions states:

“The potential air contaminant emissions of concern will be limited to primarily particulate matter (PM, including its common size fractions PM10 and PM2.5) from fugitive sources (e.g., excavation and earthworks) as well as combustion gas emissions such as carbon monoxide (CO), nitrogen oxides (NOX), and sulphur dioxide (SO2) from the combustion of fossil fuel by construction equipment and AC transport trucks. Measurable emissions of other air contaminants (other than greenhouse gases (GHGs) are not expected. There will be two boilers in the building to facilitate heating requirements for the tanks. Boiler emissions for the boiler system, using the power flame emissions details are identified in Table 2. Boiler specifications are provided in Appendix E.”

The project involves the operation of an 8 million liter an asphalt storage tank and collection hub. Monitoring, for dust and particulate matter at the property boundary of the facility, to ensure particulates are no impacting local residents would be important because the level of truck traffic potentially involved.

Odour:

Section 5.33 notes:

“Venting of the storage tank is connected with a series of pipes and conveyed to an activated carbon filter to remove VOCs and odours. The activated carbon filters will be managed with a regular maintenance program. Activated carbon filters are designed for odour management and typically remove 90% of odours. All applicable emissions standards will be met”

- Due to the proximity between (receptors) and the asphalt storage facility, odour filtered at 90% may become a concern to the nearest neighboring properties. If actual odour levels become a nuisance to nearby residents, an odour assessment and/or additional mitigation may be required, particularly in the event of public complaints.

For a detailed description of Health Canada’s guidance for evaluating air quality in EAs, please see the attachment.

Health Canada. 2016. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.

Water Quality:

Section 7.1.1.5 states:

Groundwater is the water found in the cracks and spaces in soil and rocks, generally at depth but can also be found at surface under flowing artesian conditions (e.g., springs). There are no artesian springs evident at the site. Ground water direction was reported in the 2017 Phase II Assessment (OCL, 2018) as being south, towards Halifax Harbour. Previous excavation activities at the property did not encounter groundwater.

The proposed undertaking will connect to municipal water and sewer services, and will not be using groundwater on the property. There are no known groundwater users (for potable or non-potable purposes) in the vicinity of the project

The storage of 8 million liters of AC on the site creates the potential for a spill event into the groundwater. The surrounding area includes a former the Imperial Oil Refinery, CFB Shearwater, and a Car Port and has a history industrial scale storage of hydrocarbons. The neighboring homes/businesses are likely connected to municipal drinking water sources making potable water issue negligible.

- If during future stakeholder consultation or investigations a nearby potable well is identified, baseline sampling of the well for quality and bacteriological and chemical quality may be necessary.

Country Foods:

- There is no discussion in the document concerning the potential for contamination of the

country foods harvested in the area. There is no known hunting or harvesting within 1 km of the site, but local fishing may occur in the marine environment. The exact location and collection of fish resources in the nearby marine area is not known. If known, it may be beneficial to provide information on the consumption of country foods in the area.

For a detailed description of Health Canada's guidance for evaluating country foods in EAs, please see the attachment.

Health Canada. 2017. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Country Foods. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.

If you have any comments/questions, please contact the undersigned at your convenience.

Sincerely,



Lance Richardson-Prager
Health and Environment Specialist
Health Canada, Atlantic Region
Phone: (902) 440-2714
e-mail: lance.richardson-prager@canada.ca

cc: Rick O'Leary, Manager, Environmental Health Program, Health Canada, Atlantic Region

Attachments:

Health Canada. 2016. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.

Health Canada. 2016. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.

Health Canada. 2017. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Country Foods. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.

Sent by e-mail to
Jeremy.Higgins@novascotia.ca

Health Canada. 2017. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Water Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.

Date: May 31, 2020

To: Jeremy Higgins, Nova Scotia Environment

From: Acting Coordinator Special Places, Culture and Heritage Development

Subject: Liquid Asphalt Storage Facility

Staff of the Department of Communities, Culture and Heritage has reviewed the Liquid Asphalt Storage Facility EA documents and have provided the following comments:

Archaeology

Staff reviewed the sections of the EA document pertaining to archaeology and have no archaeological concerns, as the project will take place on an existing industrial site in Dartmouth that has been in use for some time. New facilities are planned as well as the use of existing facilities that will be upgraded. The archaeological potential is assessed to be low on the site given the history of industrial disturbance. However, if archaeological resources are found they should contact CCH immediately.

Botany

Staff reviewed the sections of the EA document pertaining to botany and have no concerns. Based on available maps, available public observations, and surveys by the AC CDC indicate the presence of species of concern, and the area is largely industrial with little suitable habitat.

Palaeontology

Staff have reviewed the sections of the EA document pertaining to palaeontology. The bedrock geology in the area of the proposed facility is composed of Halifax Formation (Cambrian to Ordovician) slates, so disturbance of significant fossil resources are not likely. At this time there do not appear to be any issues with palaeontology heritage resources.

Zoology

No CCH staff were available to review the sections relating to zoology.

Environment

Date: May 22, 2020

To: Renata Magesta da Silva, Environmental Assessment Officer
Environmental Assessment Review, Nova Scotia Environment

From: Central Regional Office, Inspection Compliance and Enforcement,
Nova Scotia Environment

Subject: General Liquids Canada (GLC) Proposed Liquid Asphalt Storage Facility
750 Pleasant Street, Dartmouth, HRM

The project's anticipated reduction in greenhouse gas emissions of 60-80 % is commendable based on changes which will occur in the transportation of asphalt between New Brunswick and Nova Scotia and considered a positive attribute of the project.

However, the document placed more focus on the details of construction and not as much emphasis on baseline environmental conditions and the potential environmental impacts and control/mitigation measures of the project.

If the project is recommended to proceed to the next stages of development, an Approval pursuant to Part V of the Environment Act will be required prior to the commencement of construction and operation. This Approval would be required in accordance with the Activities Designation Regulations under Division IV, Section 10(1)(f) pertaining to a chemical storage tank system. It is recommended that the following information be supplied to support the application.

- A) Prior to construction, the Approval Holder must submit to NSE Central Regional Office for review and approval site plans, and engineered drawings which includes but is not be limited to, containment features and environmental controls identifying discharge points. The Petroleum Management Regulations and Nova Scotia Standards for Construction and Installation for Petroleum Storage Tanks Systems can be used as a reference.

<https://novascotia.ca/nse/dept/docs.policy/Petroleum.Storage.Tank.Systems.pdf>

Section 5.6.2 indicates that activated carbon filters will reduce odours by 90%. Provide technical data which demonstrates that the treated off-site ground level air emissions from the filters will be within odour thresholds and VOC's within

safe threshold limits values. The operations and maintenance programs for all odour control systems should be supplied.

- B) Comprehensive baseline monitoring program should be prepared to establish pre-existing environmental conditions on the site including noise, particulate, air, groundwater, surface water, stormwater and soils. Monitoring programs to evaluate these environmental aspects during operations should also be considered and proposed with the application for approval.

i) The plans should consider impounded tank lot water or water captured within secondary containment systems and oil/ water separation systems. This water should be evaluated and adequately treated prior to released. Proposed discharge locations should be identified.

ii) Groundwater monitoring programs which will be used to support a tank and pipeline inspection and leak detection system.

iii) Site Background information supplied in Section 7.1 indicates that Tier 1 EQS Standards were met for commercial/industrial property with PID's 00260711 and 00249490. It was not clear from the survey drawings and the text in Section 7 that areas associated with the proposed development were assessed in the Phase I and Phase II ESA. The company should provide details on the pre-existing conditions for the proposed lot which demonstrate the above. The company should also be required to establish the pre-existing conditions of the Cherubini property lot with PID # 40228849 which will be used for the asphalt transfer by pipeline.

- C) Section 3.3.2 Environmental Protection Measures section refers to GLC's existing Environmental Management System (EMS). The EMS document was not supplied with the registration. The company should be required to provide a copy of the EMS prior to further development of the project.

The EA Registration identifies the requirement for an Oil Pollution Protection Plan to comply with the marine requirements of Transport Canada. A copy of this document should be supplied with the Part V application.

Contingency plans should also be prepared for land-based mishaps. These plans would be prepared using the Department Contingency Planning Guidelines which can be accessed at the Department webpage link at <https://novascotia.ca/nse/dept/docs.policy/Guidelines-Contingency.Plan.pdf>

Page 14 of the document indicates that a Development/ Building Permit was acquired from the HRM in 2019-2020. Provide a copy of this document to support the application.

It was not clear exactly what activities were to be conducted on PID # 00643238 CNR and PID # 41464280 GLC and how these lots are associated with the operations at the facility.

I recommend the company develop and submit to NSE, a complaint resolution program to address public concerns associated with the undertaking. The complaint resolution program must include but not be limited to the appointment of a contact person designated to deal with concerns from the public.

At the request of NSE, the company should form a Community Liaison Committee (CLC).

I recommend that any future changes to the proposed project be reviewed by the Environmental Assessment Branch of the Department for potential registration and review.

Higgins, Jeremy W

From: Hingston, Michael (EC) <michael.hingston@canada.ca>
Sent: June 9, 2020 8:57 AM
To: Higgins, Jeremy W
Subject: RE: EA Registration - Liquid Asphalt Storage Facility - 750 Pleasant Street, Dartmouth, NS

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Jeremy,

ECCC has no specific comment on this project.

Michael

Michael Hingston
Head, Environmental Assessment, Environmental Protection Operations Directorate - Atlantic
Environment and Climate Change Canada / Government of Canada
michael.hingston@canada.ca / Tel. 902 426-9152 B'Berry 902 225-3534

Michael Hingston
Chef, Évaluation environnementale, Direction des activités de protection de l'environnement
Environnement et Changement climatique Canada / Gouvernement du Canada
michael.hingston@canada.ca / Tél. 902-426-9152

From: Higgins, Jeremy W <Jeremy.Higgins@novascotia.ca>
Sent: June 8, 2020 4:16 PM
To: RCF Surveiller / FCR Tracker (EC) <ec.rcfsurveiller-fcrtracker.ec@canada.ca>; Zwicker, Stephen (EC) <stephen.zwicker@canada.ca>
Subject: FW: EA Registration - Liquid Asphalt Storage Facility - 750 Pleasant Street, Dartmouth, NS

Good afternoon,

With respect to the above captioned project, we have not received comments from ECCC. If possible, we request that written notification that your organization has been provided the project information and that no comments were made under your mandate.

Regards,
Jeremy

Jeremy.Higgins@novascotia.ca

From: [Higgins, Jeremy W](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 5, 2020 8:37:48 AM

From: <>
Sent: May 2, 2020 10:07 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: The location of the proposed site is problematic due to the lack of line of sight for vehicles on the road. In both directions the driveway for the proponent is a blind spot that cannot be seen by drivers. Its bad enough that you have idiot dump truck drivers pulling out into traffic from Belmont road coming out from Atlantic Road Construction and Paving. If this were to go through a fully signaled intersection needs to be installed with lights, proper pedestrian crossing and signal lights up the hill towards Dartmouth and signaling lights on the other side of the bridge to indicate the status of the lights. Streets covered by the intersection would have to be Carleton street, Belmont Avenue and the entrance to the new facility. There should no no right turns on red lights from any traffic coming off Belmont avenue. There are too many vehicles traveling 80km in that zone for tanker trucks to safely operate Name:

Email: Address:

Municipality: Eastern Passage email_message: Privacy-Statement: agree x: 71 y: 31

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 4, 2020 8:47:47 AM

From: @gmail.com
Sent: May 2, 2020 6:53 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: It is great to see this company developing and using land which has stood unused for years. Great to see more business happening in the Woodside/Eastern Passage area. Name: Email: [@gmail.com](#)
Address: Municipality: Eastern Passage email_message: Privacy-Statement: agree x:
57 y: 25

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 4, 2020 8:48:22 AM

From: @eastlink.ca
Sent: May 2, 2020 6:18 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: Liquid Asphalt can be a hazardous product. If the fumes catch fire there can be a violent explosion. It does not make sense to place this product near a main artery to and from Eastern Passage/Shearwater as well as placing near water. There are also houses in the area making the location a bad idea. Why should my community have to host this? Name: Email: | [@eastlink.ca](#) Address: , NS
Municipality: Eastern Passage email_message: Privacy-Statement: agree x: 55 y: 29

From:
To: [Higgins, Jeremy W](mailto:Higgins.Jeremy.W)
Cc: barbadamsmla@gmail.com
Subject: General Liquids Canada plant
Date: May 4, 2020 6:36:42 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Good-day Mr. Higgins,

I have just learned of the proposal by General Liquids Canada to locate an asphalt plant at 750 Pleasant Street in Dartmouth. I am opposed to this on public health and comfort grounds. I live at _____, a short distance from the McAsphalt plant on Autoport Drive. During their open season, depending on the direction of the breeze, it is often impossible to enjoy one's own yard due to the stench of the liquid asphalt as it is transferred into the trucks. One does not dare sleep with windows open on a hot summer night as, if the breeze turns, you wake with you room smelling of asphalt and a pounding headache.

We have asked for information on the health detriments of inhaling these fumes but have never received any replies. I believe that should be an important part of any environmental assessment. McAsphalt has assured the local residents that they have availed themselves of all existing technology and cannot scrub the fumes any further.

I realize that my home is situated far enough from the proposed site that I will most likely not be affected, but oppose the development in any case. I believe that an asphalt plant should not be located within two kilometers of any existing residential development.

Thank-you for your time,



CONTACT

Barbara A. Adams
MLA Cole Harbour –
Eastern Passage

1488 Main Rd,
PO Box 116
Eastern Passage
Nova Scotia
B3G 1M5



Email:
barbadamsmla@gmail.com

Telephone:
902 406 0656

Fax:
902 469 0070

Toll Free:
1 800 595 8679 (TORY)

Web:
www.pcparty.ns.ca

Twitter:
Barbaraadamspt

Linked In:
Barbara Adams

Facebook:
Barbara Adams MLA

REQUEST for 90 DAY DELAY FOR PUBLIC RESPONSE

Liquid Asphalt Storage Facility Project
750 Pleasant Street, Dartmouth, Nova Scotia

Minister Gordon Wilson
Nova Scotia Environment
PO Box 442
Halifax, NS B3J 2P8

Environmental Assessment Branch
Nova Scotia Environment
P.O. Box 442
Halifax, NS, B3J 2P8

Dear, Honorable Gordon Wilson,

May 8th 2020

I am writing to you to share my concerns about the consultation process being implemented in my constituency with respect to the proposed liquid asphalt storage facility project at 750 Pleasant St. It is my understanding from the environmental report, that due to COVID 19, the normal consultative process has been circumvented.

To the best of my knowledge, no politicians at any of our three levels of government were officially notified of this project by the company or the NS Dept. of Environment. Constituents were notified with one notice in the Chronicle Herald on May 1st 2020 and some may have received an email. The public notice that was printed on May 1st 2020, would have been printed at the same time as our community was reeling from the deaths of 6 members of the HMCS Fredericton and an RCMP officer who was tragically killed in a mass shooting the week prior to that.

I am concerned that there has been insufficient notification of this project to those living in the area in and around 750 Pleasant St. Dartmouth. The circumvention of the normal public consultative process has the potential to leave my constituents feeling that their right to know about this project and their right to share their concerns are not being respected.

As you are aware, the environmental report was completed and published online May 1st 2020. The public only has until May 31st 2020 to submit written comments to the Environmental Assessment Branch. For the reasons outlined above, I am requesting that you provide a 90 extension of that May 31st 2020 public submission deadline. Additionally, given that COVID 19 restrictions prohibit public gatherings, I would like to request that the company be required to send a letter to all constituents living in the South Woodside, Shearwater, Eastern Passage and Cow Bay areas given them notice of the project and sufficient time to respond in writing with their concerns. I look forward to hearing your response to these requests.

Sincerely yours,

Barbara Adams

Barbara Adams (MLA) Deputy Caucus Chair
Critic for Seniors, Home Care and Long Term Care
Cc Mr. Darrell Sampson, Mr. Bill Karsten, Mr. Paul Koke

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: MLA Barbara Adams letter of concern and request re: Asphalt Project 750 Pleasant St. Dartmouth
Date: May 11, 2020 8:55:32 AM
Attachments: [MLA Barbara Adams letter to Minister Wilson regarding Asphalt Facility Project 750 Pleasant St May 8th 2020.pdf](#)

From: Barbara Adams <barbadamsmla@gmail.com>
Sent: May 8, 2020 5:51 PM
To: Environment Assessment Web Account <EA@novascotia.ca>; Bill Karsten <bill.karsten@halifax.ca>; Darrell.Samson.C1A@parl.gc.ca; Minister, Env <Minister.Environment@novascotia.ca>; Barbara Adams <barbadamsmla@gmail.com>
Subject: MLA Barbara Adams letter of concern and request re: Asphalt Project 750 Pleasant St. Dartmouth

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Dear Minister Wilson,

Please find attached a letter of concern regarding the public consultation of an Asphalt Project going on in my community at the present time.

I am requesting an extension of response time from the community of 90 days past May 31st 2020, as well as a requirement of the company to mail out a letter of notice to all constituents potentially affected by this project.

I look forward to hearing from you.

Barbara Adams
MLA Cole Harbour - Eastern Passage

Deputy Caucus Chair
Critic for Department of Seniors, Home Care and Long Term Care
NS Legislature Health Committee PC MLA Representative

Office: 902 406 0656

Fax: 902 469 0070

1488 Main Rd
PO Box 116
Eastern Passage
B3G 1M5

The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 11, 2020 8:55:53 AM

From: @gmail.com
Sent: May 8, 2020 5:20 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: The local residents deserve to see studies, with factual information, showing that flora and fauna, noise impacts, traffic impacts, emissions, etc. were properly assessed. We also deserve a public consultation meeting, with an opportunity to ask questions. This can be done via zoom or other similar platform. Name: Email:

[@gmail.com](#) Address:

Municipality: Dartmouth email_message:

Privacy-Statement: agree x: 65 y: 14

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: General Liquids Canada - Liquid Asphalt Storage Facility
Date: May 12, 2020 2:38:42 PM

From: @gmail.com>
Sent: May 12, 2020 2:37 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: General Liquids Canada - Liquid Asphalt Storage Facility

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Hi,

I am a community member in Eastern Passage for almost 20 years, I do not support the Asphalt Facility they wish to put in Woodside Community, the Environmental Impact Statement (EIS) stated that there will be waste, emissions in the air and a pipeline which would be used for the transportation of the cement via water (ship), ground (trucking). The ships which come into our environment release waste into the water, its bad enough we have the Auto Port which has large tankers carrying cars, large equipment off loading to VIA Rail. There has been a chemical release in the air at certain times of the day right when I drive in front of the Auto Port, I smell it and it makes me grasp to hold my breath while driving by, you cannot tell me that is not harmful to people and has no impact on the wildlife and air around Eastern Passage/ Woodside.

Woodside is in a urban community with residents who have already endured years of industrial business purchasing land, building tanks, underground, above ground, stacks, pipelines above and underground. The materials used to build these tanks, facilities and pipelines are not bullet proof they should not be located anywhere near residential communities. You are poisoning our air, land and water.

The EIS also stated they reached out to Millbrook First Nations, Indian Brook First Nations (Sipeknekitak) and KMKNO, but there are 13 First Nations Bands in Nova Scotia and this land that is in question is not on reserve, it is off reserve so the motivation may not be the greatest to respond as it directly impacts the Aboriginal Population living off reserve. The organization that aids the Urban Ingenious Peoples is the Mi'kmaw Native Friendship Center in Halifax, it is that community who best supports initiatives off reserve in my humble opinion.

This is concerning not only for the health of the people but the wildlife and land in which should not be used for industrial purposes by the water. There are enough industrial businesses in Woodside/ Eastern Passage area, water treatment facility (which the smell at times makes you want to vomit), Irving, Metal Fabrication etc..., there must be an alternate location or country location. Our people (all people) have lived near the water for thousands of years, just because you see any easy way to

make money via shipping, transporting on water and land does not mean that you should ignore the residents who live there, who work hard for their homes and the land that they pay taxes on for the water they drink and use to cook with and for the clean air which they need to breath to live their fullest life.

Please do not put it in Woodside/ Eastern Passage. These areas need to be kept residential for the people!

Thanks for your time,

Resident/ Community Member

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Woodside Asphalt Storage Facility
Date: May 25, 2020 8:38:16 AM

From: @gmail.com>
Sent: May 23, 2020 1:24 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Woodside Asphalt Storage Facility

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Good afternoon,

This letter is for Gordon Wilson, my name is _____ a resident of _____, Dartmouth. I understand the due date of our opinions on the subject are due by May 31st 2020 but due to Covid and other issues in the News no residents of this area have any idea of the proposed changes. We would like an extension of 90 days on the due date to contemplate the issue. No one here has received any notice of the change even though it is listed that we received it in the mail. I can say now that no resident of Belmont would be happy with the idea of an asphalt storage facility in the area.

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 26, 2020 8:35:26 AM

Hi Jeremy, although the project has not been identified, I believe this is a comment on the proposed asphalt storage facility.

I reached out to _____ to be sure but did not hear back yet.

R

From: _____@hotmail.com>
Sent: May 24, 2020 10:23 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: - Choose - Comments: I have a lots of concern regarding this project and why the project is as far ahead as itâ?Ts at the point.i think that the public have a right to know what is having in their backyard and the dangers associated with these project.i know lâ?Tm a small voice in this matter but I know that I speak for myself and the safe of all residents in this areas.i can tell you this that most people I might area might not know what happening around them but I do take notice and sometimes itâ?Ts the one that have the knowledge to know to speak for there family neighbours and friends.So lâ?Tm speaking and I donâ?Tt like the fact that this project is happening in the location that it happening especially with the nature of the risks associated with it...like what the evacuation plan for residents and not to mention the gas to be release at the flash point. What is that supposed to be healthy for us . I say the people have some rights to choose and we choose safe environment for our kid.stay safe everyone and letâ?Ts build a stronger community that works safely for everyone Name: _____ Email: [@hotmail.com](#) Address: _____ Municipality: _____
Dartmouth email_message: Privacy-Statement: agree x: 79 y: 24

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 27, 2020 8:33:34 AM

From: @gmail.com>
Sent: May 26, 2020 7:27 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: I was notified by my MLA about this project and living very close to the area, I find it outrageous that the province continues to pollute our neighbourhood. First, by allowing a refinery, in the middle, of the city to pollute our air and now by allowing a Liquid Asphalt Storage that again will pollute our air and make our neighbourhood smell. It is time for the city to stop thinking our neighbourhood as a 2nd class citizen and realised that we, also, deserve the right to live in an unpolluted area. Why a cyclovia is not build? why not more parks instead of making our neighbourhood the closest possible to a Nova Scotia Chernobyl? A very insulted, first class citizen, neighbour Name: Email: [@gmail.com](#)
Address: : DARTMOUTH email_message: Privacy-Statement: agree x:
43 y: 28



Lands and Forestry

MEMORANDUM

TO: Jeremy W. Higgins, NS Department of Environment
FROM: Department of Lands and Forestry
DATE: May 29, 2020
RE: Liquid Asphalt Storage Facility, General Liquids Canada

The Department of Lands and Forestry (Department) provides the following comments on the above project:

Crown Lands:

This project is not on Crown lands and would not require any approvals/authorities from the Land Administration Division of the Department of Lands and Forestry.

Wildlife, Wildlife Habitat and Surveys:

The Department is not anticipating that there will be significant impacts regarding:

- **Species at Risk/Significant Wildlife Habitat:**
There are no listed occurrences for Species at Risk within the proposed footprint and there are no areas within the proposed footprint listed as Significant Wildlife Habitat in the *NS Significant Species and Habitat Database*.
- **Migratory or At-Risk shorebirds:**
This site is not recorded as known breeding habitat for migratory or At-Risk shorebirds or waterfowl. Industrial lighting is already present adjacent to the site and it is not expected that any additional lighting at the site would negatively impact migrating birds.
- **Flora and Fauna/Habitat:**
Given the past and existing industrial activity in and around the site, the Department of Lands and Forestry does not anticipate significant impacts on flora and fauna nor their habitat from the proposed activity.

The Department recommends that the proponent be advised that although significant impacts on wildlife and wildlife habitat are not anticipated, they have responsibilities under federal and provincial legislation and regulations:

- It is the responsibility of the proponent to ensure compliance with federal and provincial legislation and regulations regarding resident, migratory, and at-risk species and their habitats (*Species at Risk Act, Canadian Migratory Bird Convention Act, Fisheries Act, NS Endangered Species Act, NS Wildlife Act, and their regulations*).
- Should nesting birds or their young, or any species-at-risk, be encountered on site during construction the proponent must contact a Species at Risk Biologist, Wildlife Division, Nova Scotia Department of Lands and Forestry to discuss immediate actions and mitigation.

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 27, 2020 1:46:06 PM

From: @gmail.com
Sent: May 27, 2020 1:29 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: Hello. My first question is why is the EA being carried out once a major part of this project is already completed? I would like to extend a warm thank you to our MLA Barbara Adams for circulating the Notice pertaining to this EA. I find it troubling that this project was initiated without a completed EA. The Public Consultation was carried out at the easiest manner possible by PLC blaming Covid19 for the shortcomings. My point of contention is that the material provides a SDS for the Paratherm NF Heat Transfer Fluid but did not refer to the SDS for the Asphalt Cement AC. May I state that an 8000 liter quantity of AC actually carries the most risks! Was this an oversight or an attempt to lessen the possible risks? I went on line to view the content of the SDS from Irving. The document is readily available and is the most important of the two SDS that should form part of the package. Is there not a need to consult this document given that they will be using a flammable solid that requires to be heated to transport or transfer. The issues I noted would be set up should there be an incident where the AC is brought up to a liquified state and a major failure could trigger a fire. The SDS contains information that are worrisome to us as residents in very close proximity to the propose plant. How does GLC proposes to communicate to us that a situation is evolving and the actions required to ensure our safety? Would they make use of the HFX alert? Thank you for your consideration. Regards Name:

Email: [@gmail.com](#) Address: Municipality:

Dartmouth email_message: Privacy-Statement: agree x: 60 y: 24

Fairclough, Andrea C

From: @hotmail.com>
Sent: May 21, 2020 3:11 PM
To: Minister, Env
Subject: Asphalt storage Facility
Categories: Printed and Routed for Response

**RECEIVED
MINISTER'S OFFICE**

MAY 22 2020

56234

NOVA SCOTIA ENVIRONMENT

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Hi Minister,

I have growing concern regarding the wanting to place a liquid asphalt storage facility in the woodside/ shearwater area.

I believe a 90 day extension should be granted to be able to provide the community with pertinent consultation. Rushing this during a pandemic is highly inappropriate since, we can't gather to have discussion. Until restrictions can be raised to gather I, I don't know how you are able to move forward with appropriate community input and consultation.

Across Canada and seen numerous times in NS companies are not held for remediation, clean up, or reclamation of the land once their tenure is up. What is the timeline for this storage facility? Being an environment minister I would assume this would be a huge component and aspect to the in the plans for this facility. Yet I don't see them in the plan proposal.

Has there been consultation with the city in what this will do for increase of traffic in the area. As it's limited access into Eastern Passage and Cow Bay. We only really have one entrance to get to the passage and it's right where this plant is purposed to go in. Traffic is bad enough on a regular day, let alone when you add this increased number of trucks.

With this additional traffic for larger style trucks, what affect does this have on our air and noise pollution in the area? On our roads?

I think a true consultation of our communities are needed. And we should be granted an extension to be able to discuss these plans. Seems like gov is trying to rush this, and is trying to take advantage of our community, in such a hard time with the pandemic and numerous tragedies that the province and our very community has suffered through. Or postpone any discussions until restrictions to gathering are lifted.

Thank you,

Fairclough, Andrea C

From: @gmail.com>
Sent: May 21, 2020 3:45 PM
To: Minister, Env
Subject: Liquid asphalt storage facility needs to be addressed ASAP
Categories: Printed and Routed for Response

RECEIVED
MINISTER'S OFFICE

MAY 22 2020

56237

NOVA SCOTIA ENVIRONMENT

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Dear Environment Minister,

If you could please take the time to consider the outpour of concerns coming from the communities of Shearwater, Woodside and Eastern passage and surrounding areas during this time.

“ Barbara Adams has been fighting against some of the process for this the past couple weeks. Sadly because our community and province has been dealing with tragic events, information for this may have been missed by many.

Concerns for this include increased heavy traffic in the South Woodside area, leading to and from the Circ. As Barb mentioned in an email to myself and others and as she has shared on social media:

"Originally over 600 large trucks move asphalt around the province of NS. If they use smaller trucks then the potential for 1200-1800 trucks to be coming into Shearwater is a real possibility. This already is a high traffic area with a number of accidents."

I don't know about you, but I know at my house, getting home through South Woodside, Shearwater and into the Passage in the afternoon is already tough!

Added heavy traffic means hard wear and tear on our already poorly maintained roads! It means more risk for accidents as people get frustrated with the heavy trucks and traffic. We have limited access getting into and out of Shearwater, Eastern Passage and Cow Bay as it is now. Also the pollution (noise and air) that many more trucks coming and going create!!

Some of my own other concerns to this include the fact that as Barb has pointed out to the Minister of Environment, there has not been fair consultation with the communities. 30 days when we are not permitted to gather in groups, have dealt with multiple tragedies and many do not have access to technology to get clear concise information, makes this project too much in favour of the industry and not about the people. There are folks in this corridor who are very impacted because they are marginalized due to socio-economics and may not have the ability to speak out. I personally, am always aware and concerned about our province's history of environmental discrimination on disadvantaged areas. There are levels of hidden poverty that exist and they could become more prevalent if unseen challenges happen from this project.

Finally in reading some aspects of the attached document, I'm also concerned that there is no plan on reclamation of the land when operations of this business cease in how ever many years (Couldn't find a timeline for life span of storage facility) We have seen what's been happening with the abandoned storage facilities from the oil industry. What will happen with this property in 20-50 years??"

Please consider how this will impact the communities for present and future.

Thank you for your time,

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 29, 2020 8:35:32 AM

One more...

From: @hotmail.com
Sent: May 28, 2020 4:44 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: I would like to express my opposition to something like this in Dartmouth. Families will suffer from the toxicity of the facility no matter how well they try to follow protocol. Thank you. Name: Email:

[@hotmail.com](#) Address:

Municipality: Dartmouth email_message:

Privacy-Statement: agree x: 68 y: 15

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: ASPHALT STORAGE PROJECT
Date: May 29, 2020 10:00:55 AM

From: @outlook.com>
Sent: May 29, 2020 9:59 AM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: ASPHALT STORAGE PROJECT

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

As resident of South Woodside I am not in favour of this project. With the refinery and Moirs gone we do not need a replacement for more noise, poor air quality and God knows what else that comes with a facility like that. MY OPINION ONLY. Regards

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Liquid Asphalt Storage, 750 Pleasant St. Dartmouth
Date: May 29, 2020 2:13:42 PM

-----Original Message-----

From: >
Sent: May 29, 2020 2:10 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Liquid Asphalt Storage, 750 Pleasant St. Dartmouth

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Good afternoon,

My family lives at _____, Dartmouth, _____ from this proposed facility. The use of the word "proposed" seems disingenuous given that the storage structure is already there, between my street and the ocean and its inevitable wind currents. And while I am not an expert on the storage of liquid asphalt, I have gleaned two points from my investigation into it. One is that liquid asphalt must be warmer than solid asphalt, meaning that the required warmth of it while stored is likely to cause fumes in our small neighbourhood. The other point is that every website disputing the local health/environmental harm of liquid asphalt storage is run by a asphalt and paving lobbying association.

I'm concerned that the plans for this "proposed" facility were not proactively disseminated to the local community that will be most impacted, and instead were hand delivered by a local MLA in opposition to the current provincial government. I'm concerned that while opposing parties might be using the allowing or denying of this facility as political capital, those of us who live in the area have to worry about carcinogenic fumes with the potential to cause headaches, respiratory illnesses, or cancer. I'm concerned about my little girl trying to play in a park just two street lanes away from toxic chemicals. I'm concerned about

I'm concerned that if my neighbours and I were wealthier and therefore more politically influential, no one would have dreamed of building this facility near us, meaning I now have to weigh the two options of living somewhere that could be slowly killing us or moving to somewhere we cannot afford.

I am concerned. I am also against the creation of this facility here.

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Liquid Asphalt Storage Facility, Dartmouth NS
Date: May 29, 2020 2:36:39 PM

From: @gmail.com>
Sent: May 29, 2020 2:26 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Cc: barbadamsmla@gmail.com
Subject: Liquid Asphalt Storage Facility, Dartmouth NS

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Good afternoon,

I live _____ in Dartmouth, _____ from the proposed liquid asphalt storage facility at 750 Pleasant Street. I have lived here for over 10 years and have many ties in this community.

I only learned about this facility when our local representative dropped off a memo about it to residents in my neighborhood earlier this week. Not only am I incredibly disappointed to have not heard about it earlier (Was there no community consultation? It doesn't seem like it.), I am also very concerned about the safety of this project.

This is not strictly a commercial district. It is very much a residential neighbourhood with many families living here, including small children. There are children on my street--including my own child-- _____, and I fear for the air quality in our area should this project go ahead as planned.

Has there even been an environmental impact study completed? Will there be one before this facility is allowed to open? How will this affect our air quality, the safety of our water supply, the property values of our homes? These are just a few of the questions I would like answered, as a concerned resident.

I am absolutely opposed to this project and I expect some accountability to the community who would be most impacted by it.

[@gmail.com](#)

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 29, 2020 3:50:52 PM

From: @gmail.com>
Sent: May 29, 2020 3:50 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: This project concerns me as a person with Multiple Chemical Sensitivities. Exposure to petroleum products causes me many serious health issues. In the summer the east/south east winds would be blowing the asphalt smell up to where I live. I wouldnt be able to open my windows or sit outside. Please find another place away from residential areas. Name: Email: [@gmail.com](#) Address:

Municipality: Dartmouth email_message: Privacy-Statement: agree x: 59 y: 33

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: May 29, 2020 3:53:16 PM

From: @yahoo.ca
Sent: May 29, 2020 3:51 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: TO WHOM IT MAY CONCERN: I would like to OBJECT to the proposal for this project for a number of reasons: 1. This is a major health and safety concern for me. I have severe chemical sensitivities that cause me a number of health problems

. I know a several of my neighbours have similiar issues. 2. The smell and chemicals will make my home uninhabitable. I will not be able to open my windows or sit outside. 3. I have spent a considerable amount of money to make my home safe for me to live in. 4. This is a residential area although I do recognize that there are commercial properties as well. In an age of health and safety this facility should be outside the city limits away from residential areas. Is there not a more remote area for this facility?? I am therefore opposed to this Liquid Asphalt Storage Facility in this area. Name: Email: [@yahoo.ca](#) Address: Municipality: Dartmouth email_message: Privacy-Statement: agree x:

68 y: 22

From: @eastlink.ca
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: May 30, 2020 2:36:46 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: I wish to voice my concern about this project. There should be consultation and input from every citizen that will be affected by allowing this project. The area is dangerous enough without increasing the traffic congestion for this project. I call on the Minister to halt the project and to get the input from the citizens in the area. Name: Email: @eastlink.ca Address: Municipality: EASTERN PASSAGE email_message: Privacy-Statement: agree
x: 54 y: 17

From:
To: [Environment Assessment Web Account](#)
Subject: Asphalt plant
Date: May 30, 2020 8:49:22 AM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Hi there im a resident of Eastern passage and I strongly oppose the asphalt storage in woodside shearwater area that I drive thru daily

Sent from [Outlook Mobile](#)

From:
To: [Environment Assessment Web Account](#)
Subject: Liquid asphalt plant in eastern passage
Date: May 30, 2020 7:49:07 AM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Minister of environment

I am writing of my concern with putting this plant in my residential neighborhood. This plant is better suited in an industrial area not in the middle of our homes. This would cause higher traffic on an already busy road. It would effect the well-being of our citizens. Please find another location away from our children.

Thank you

Resident of Eastern Passage

From:
To: [Environment Assessment Web Account](#)
Subject: Against asphalt storage facility
Date: May 29, 2020 8:39:24 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Hello

I am sending this email to voice my concern over the liquid asphalt storage facility that is in the works with general liquids Canada on Pleasant street.

There are so many environmental reasons which have red flags. Also this is a very busy stretch of Road for Eastern Passage and Cow Bay residents and adding this would make things much worse.

Please reconsider, our community is beautiful, let's keep it this way!

I am completely against this project.

From:
To: [Environment Assessment Web Account](#)
Cc: [Barbara Adams](#)
Subject: Asphalt Storage Facility Project in South Woodside.
Date: May 29, 2020 6:43:10 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Hello,

I wish to communicate my opposition to a proposed Asphalt Storage Facility Project in South Woodside.

I understand that on May 1, 2020, General Liquids Canada, the Municipal Group of Companies, registered the Liquid Asphalt Storage Facility Project for environmental assessment, in accordance with Part IV of the Environment Act.

As a resident of Eastern Passage with two young children, I am concerned that:

- 1) the normal notification and public consultation process was not possible due to Covid 19.
- 2) given the enormity of the tragedies we have suffered in our community that the one public notice in the Chronicle Herald on May 1st 2020 may have gone unnoticed by many in the community.
- 3) this area is already a traffic nightmare for many residents with numerous accidents occurring there each year.
- 4) there will be additional environmental exposures in a community already dealing with decades of environmental smells and health consequences that come with that.

Thank you,

From: @yahoo.com
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: May 29, 2020 5:39:21 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: I had read the proposal and do not feel that the company has answered the impact of odor to the community, residents and tourists who will be passing by that stretch of pleasant street daily. The proposal indicated no impacts are anticipated as a result of the project, and on-site odours will be limited. Prevention is a basic design criteria is indicated but little to support this. These area has had to deal with a lot of odors including fuel, sewer as well as direct health issues from contaminated soil. As a person with restrictive lungs anything that negatively impacts air quality even if its just while constructing the facility is too much after so many years of similar promises and no accountability. What is the recourse if they cant manage the fumes or odor Name:

Email: @yahoo.com Address: Municipality: Eastern Passage
email_message: Privacy-Statement: agree x: 85 y: 29

From:
To: [Environment Assessment Web Account](#)
Subject: Comment about the proposed liquid asphalt storage facility at 750 pleasant street in Darthmouth
Date: May 31, 2020 11:26:27 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Hello,

I live close to the location where the liquid asphalt storage facility is going to be built. I am not happy about this as I anticipate disruptions to my daily life and health, such as disrupted rush hour traffic and industrial noise and safety hazards. I hope that the relevant parties reconsider this proposal as I believe that a lot of residents and businesses will be adversely impacted by the operations of such a facility. Thank you very much for your understanding.

Best Regards,



Virus-free. www.avg.com

From:
To: [Environment Assessment Web Account](#)
Cc: barbadamsmla@gmail.com
Subject: Liquid Asphalt Storage Facility
Date: May 31, 2020 7:19:21 PM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Hello.

I live in Eastern Passage. I have concerns about the Liquid Asphalt Storage Facility. More concerning is that government has not given the community the standard amount of time to educate themselves regarding the Storage Facility. Please give us this time, especially given the unique and stressful covid-19 times. This is a reasonable request.

Thank you for your consideration.

Sent from my iPhone

To whom it may concern,

I am writing regarding my concerns for the liquid asphalt storage facility project located in South Woodside (750 Pleasant St.).

This project has been operating for quite sometime and I am confused as a member of this community on why we not notified of this proposed project before construction began. I am not in support of this project as the smell from liquid asphalt can be very harmful to the environment, residents in the community and our animals. This eyesore will bring our property value down and will take away from our beautiful view of Halifax harbor. I do not believe that a project to this nature is or should be acceptable by our government to be placed directly in the middle of a residential area.

I hope with the community's feedback, you will reconsider this project for the South Woodside area. I would appreciate a follow up pertaining to this issue and moving forward, specific information on what is being done and how we can prevent situations like these from occurring again.

Respectfully Submitted,

From:
To: [Environment Assessment Web Account](#)
Cc: barbadamsmla@gmail.com
Subject: General Liquids Canada
Date: May 31, 2020 4:29:19 PM
Attachments: [IMG_2101.PNG](#)
[IMG_2102.PNG](#)
[IMG_2103.PNG](#)

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

May 31, 2020

Good day,

As I'm just hearing about this proposed idea, I am now able to respond.

I believe that this is a terrible idea in a terrible location. It's built in a bad location in Dartmouth at 750 Pleasant Street.

It's already a treacherous corner to navigate on our daily commute through the area. Adding 600+/- trucks to the area, with a blind corner, is not the best location for such an already busy area.

Most, if not all of those trucks will be turning left out of that driveway, meaning each and every one of them will be affecting all four lanes of traffic and a busy, lighted crosswalk. That's a set up for disaster.

Slow moving vehicles in that already congested area is not something anyone needs.

May I suggest this type of 'business' establish their roots in a fully functional 'business park', such as Burnside. It was created and designed to facilitate this sort of business and volume of trucks.

Thanks in advance-

~ Eastern Passage resident since 1999 ~

Inline image



Inline image



Inline image



From: @gmail.com
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: May 31, 2020 4:18:56 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: This seems like something that's happening because we are distracted by a pandemic and police brutality. Also seems like something that could easily be approved somewhere else, not close to homes, schools, the general public, businesses or the harbour. I am highly against this project in this location.
Name: Email: @gmail.com Address: . Municipality:
Halifax email_message: Privacy-Statement: agree x: 54 y: 31

From: @live.ca
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: May 31, 2020 4:16:53 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: Im concerned about the lack of public consultation that occurred with this project. Yes, notice was published on May 1, but it was only published in one paper. I only found out about it because my MLA left a letter on my door, on the LAST day of public consult the MLA did great, the consult period was not long enough. She requested an extension for public consult and was denied. I also have concerns about environmental impacts. This will be built close to a playground and our waterfront, in an area where many people live. Will there be fumes/waste put off from the site? How will they be mitigated? What about noise levels? Assuming it does get approved, how many new jobs will it create? Name: Email: @live.ca Address: Municipality: Woodside email_message: Privacy-Statement: agree x: 22 y: 28

From: [Environment](#)
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: May 31, 2020 3:38:48 PM

Project: liquid-asphalt-storage-facility-project Comments: I would appreciate it if the normal consultative process would not be circumvented due to Covid19 concerns. I personally would like to know the risks of having this in my community. Wouldnt want an accident with asphalt fumes like in Wisconsin. <https://sites.google.com/site/metropolitanforensics/the-explosive-danger-of-the-asphalt-fumes-a-reminder-after-the-asphalt-tank-explosion-at-la-crosse-wisconsin> Name: Email: Address: Municipality: Dartmouth email_message: Privacy-Statement: agree x: 78 y: 29

From:
To: [Environment Assessment Web Account](#)
Cc: barbadamsmla@gmail.com
Subject: General Liquids Canada, Liquid Asphalt Storage Facility
Date: May 31, 2020 2:20:08 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Dear sir or madam;

At the request of my MLA Barb Adams, please accept this correspondence with regards to the environmental assessment for the asphalt storage facility being proposed at 750 Pleasant St, in South Woodside, for consideration in the approval/no-approval process.

For a number of reasons I do not support General Liquids Canada desire to operate yet another facility of this nature in our community. As you may already know (hopefully), there is a similar operation (MCA) located on Autoport Rd, in Eastern Passage. Based on the fact that the residents there already endure the offensive smell emanating from MCA, whose impact on health may not be fully understood, why on earth does this community need another ?

Along with the offensive odours expected to waft from the site, it should be kept in mind for further consideration, that along with all the homes in the immediate area, not more than 200 meters away you will find the residence of the Commander of 12 Wing, at Canadian Forces Base Shearwater. Does the department think this is a meaningful way to demonstrate gratitude to the soldiers, sailors and aviators (re: potential neighbours, if approved), who spend millions of dollars supporting the local, extended and provincial economy ?

Every level of government has used the phrase, "These unprecedented times call for unprecedented actions", during the COVID-19 pandemic, yet your department is unwilling to take the unprecedented decision to extend time for local residents to voice their concerns or support, during what should and could have been a meeting where "community engagement" could be sought.

I am also wondering why so much construction has been permitted at the site. To date a new road was built, an old storage tank was re-furbished, and a building has been erected. And this is only what residents can see driving by the site. I'm also curious as to the means this liquid asphalt will enter and leave the site, as there is an existing rail bed, and there is water access to the site, and then there is going to be the issue of traffic, if large trucks will be entering and leaving from that location. This particular spot of road has been the location of numerous vehicle and pedestrian accidents. Do we really need to add to the potential of more death and injury at that location ?

After a military career spanning 30 years of service, my wife and I (both Bluenosers), chose Eastern Passage as our home in retirement. After being away so long we were very encouraged to see the changes made at both refinery sites, and took it to be the province's attempt at promoting a "greener" Nova Scotia life and work style. With the latest proposal by General Liquids Canada, Canada's Ocean Playground seems to be moving in the wrong direction.

In closing, I share my MLA's concerns regarding the lack of community engagement on this environmental assessment, and agree an extension should be granted for that engagement to occur. On various social media platforms, it is very easy to see that this is an issue which the residents have differing opinions on, and I believe further demonstrates the department needs more time to hear from the community. As there is already work being conducted at the site, lacking the conclusion of an approved environmental assessment, what harm would there be in granting the electorate an extension to further communicate their concerns, or support ?

Thank you in advance for adding this correspondence to that which you already received regarding this matter.

Respectfully,

@yahoo.ca

From:
To: [Environment Assessment Web Account; barbadamsmla@gmail.com](mailto:barbadamsmla@gmail.com)
Subject: environmental assessment of asphalt plant project 750 Pleasant St.
Date: May 31, 2020 11:45:50 AM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Environment Assessment Branch
Nova Scotia Environment

To whom it may concern,

I am writing to you today with regards to the planned environmental assessment of the asphalt storage and processing facility proposed for development at 750 Pleasant Street, in Dartmouth. I have hesitated to write to you as I feel my comments may fall on deaf ears. I believe that this project has already been given the green light, evidenced by the work that has already been done there. I am very concerned about the impact that this facility will have on our lives and on the lives of all who live in Dartmouth.

They are calling this facility an asphalt 'storage' facility. This gives a false sense that we will not be affected by it. I find it to be deceptive. Liquid asphalt will be shipped in. They will use this liquid to prepare asphalt cement to send to all corners of the province. We expect the air quality to be profoundly affected. Not only will there be carcinogenic emissions from the asphalt cement making process, but there will also be exhaust from the ships that must dock there and tons more CO2 emissions from the hundreds of trucks that will be constantly coming and going. Even though the land is zoned industrial, it seems nonsensical to build such a polluter within city limits, let alone across the street from a residential neighbourhood.

Apparently, the company who plans to destroy our neighbourhood's air quality, General Liquids Canada, posted a notice in the Chronicle Herald on May 2nd, 2020, to advise us of their plans. A weekend that saw Nova Scotians reeling from the horror of a mass shooting, all while dealing with a pandemic, the likes of which we have never seen. I was not aware of this posting as I do not subscribe to that newspaper. Such is the case with many of my neighbours. We simply did not know. Our MLA, Barbara Adams took it upon herself to distribute printed information to everyone here; advising us of the planned project. If not for her efforts, we would not have known about this and the deadline would have come and gone. That was just one week ago. So for many of us, we've only had one week to come up with feedback on this project. Not enough time. We feel as though we have been blindsided.

Barbara Adams wrote to Gordon Wilson MLA, Minister of Environment, requesting an extension to the May 31st deadline for feedback, as would only be fair considering the fact that any kind of public meetings about this project have not been possible during the pandemic. It is clear in Mr Wilson's reply to Barbara Adams, that he sides with the company who plans to build this monstrosity, and not with the residents who have called this place home for many years. The extension was denied.

I am shocked and appalled that no one from the company thought that it might be a good idea to communicate directly with the citizens who live here. Why not be good neighbours and try

and establish some level of trust? When the idea of mailing notices to those of us who live here was suggested to them by our MLA, Barbara Adams, they responded with, "No, we don't have to." When she first began to ask questions about the development that has been happening there (curbs, roadway, fencing, land leveling and preparation), she was told that this was only an access road. The fact that this company can lie about their operations and the fact that they refuse to communicate directly with us shows us that they clearly do not care about what effect this will have on us. This is a huge red flag for those of us who live here. It tells us that our new neighbours cannot be trusted.

I have lived here in this neighbourhood for more than 25 years. There have been many changes to the industrial lands that surround us during that time, but it remains a good neighbourhood to live in. That will change drastically when this plant is up and running. My husband and I have decided to move away from here. We simply cannot live next to neighbours that we cannot trust, as they can have a profound effect on our quality of life. We cannot afford to move, it will be a hardship, but we refuse to live next to an asphalt plant and be poisoned by the emissions and the traffic. Our property values will plummet once this project goes ahead. With no hope of any recourse, our spirits have been broken by this proposed development.

We feel that everyone in this city will be affected by the pollution that this will bring. It is well documented that the fumes from asphalt processing are carcinogenic and cause respiratory problems. The same can be said for the stink of burning diesel, which will be its constant companion as ships, trucks and trains come and go from our quiet little neighbourhood.

I understand that a formal decision on this project can be expected by June 20th. We anxiously, yet sadly wait for the announcement that we feel will come. This will affect everyone here in Dartmouth, as the prevailing winds are from the harbour and will carry this pollution far and wide, over our city. Such a plant should not be built within the city limits. I am horrified that it is even being considered.

I ask you to consider declining to give approval for this project. You have the power to stop them from poisoning us and the rest of the city.... I am pleading with you to use it and keep our city's air clean.

with great concern for everyone's well being,

Sincerely,

email: [@gmail.com](mailto: @gmail.com)

CC: Barbara Adams, MLA

From:
To: [Environment Assessment Web Account](#)
Subject: Liquid Asphalt Storage Facility: Public consultation
Date: May 31, 2020 10:24:58 AM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Hello,

I'm writing concerning the plans for Liquid Asphalt Storage Facility proposed to be built at 750 Pleasant St.

I hold that:

- a) The public consultation deadline must be extended from May 31st to August 31 given the current circumstances. It is a criminal offence not to provide an opportunity for the public to comment on the project, and anything less than an extension equates to not providing such opportunity.
- b) I am concerned about the odour release from the facility. Although the environmental report states that the delivery of the AC will be conducted through pipes, which does prevent the majority of VOC off-gas, it is silent as to how the release of VOC and other compounds will be prevented at the junction of a truck and the delivery pipeline. The fuel delivery station owned by Irving by the Woodside ferry suffers from a significant release of dangerous compounds into the air at the junction of the fuel delivery pipeline and the truck. The project must account for this and modify the site plans to prevent ALL possible off-gassing.

Best,

From: @gmail.com
To: Environment Assessment Web Account
Subject: Proposed Project Comments
Date: May 31, 2020 10:21:42 AM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: I have reviewed the General Liquids Canada Inc Dartmouth Liquid Asphalt Oil Handling Facility Environmental Assessment Document, and have concerns that they dismiss the issue of increased truck traffic out of hand, referring to a minimal increase in truck traffic which would have negligible impact. So they have determined that there is no problem that needs to be addressed in regard to transportation Traffic. I refer to Table 3 Project VEC Valued Environmental Component Scoping Transportation where they state in part, Pleasant Street is located in a General Industrial Zone in Dartmouth where a minimal increase in truck traffic to this specific site through the addition of the asphalt facility would have negligible impact. In the Rationale Column the writers state Not a VEC no significant increase in truck traffic is expected, and based on the industrial setting, potential impacts are considered negligible. The submission document provides a clear indication of the planned volume of truck traffic in the following statement. The essence being, 1 barge = 500 tanker trucks Saint John's, NB oil refinery by truck to Waverley, N.S., culminating in over 500 trucks per year doing 10-hour round trips. By shifting the mode of transportation to a marine barge, it will result in an important reduction in greenhouse gas emissions by approximately 60 to 80 based on standard industry emissions rates for both, including loading/unloading and overall road safety and reduced congestion, by reducing trucks on the road. This carbon footprint reduction will be realized by replacing the holding capacity of 500 trucks with one barge. It is expected that 2-4 barge trips will be required annually when the project is fully operational. Based on the above statements, we can mathematically project that the impact will, if fact, be significant as follows: The projected 2-4 barge loads to the holding facility annually results in 2000 truck loads leaving the facility, which means they are confirming 4000 truck movements to and from annually we can anticipate the concentration of truck traffic in and out to be seasonally from mid-April to mid-October, over a 6 month period, 22 trucks per day if a 7 day operation entering empty, leaving with load. More probable we will see a 5 day weekly operation except at a summer peak. That means 182 days for 6 months, minus 51 weekend days resulting in 131 days of truck movements. Dividing 4000 movements by 131 days we will have 30 truck movements daily travelling on pleasant street to the 111. Now, considering these movements will likely occur in a 12 hour span between 7 am and 7 pm daily, the impact becomes even more significant as we are looking at 60 truck movements in that 12 hour span, a timeframe that residents of the immediate area, Shearwater, and Eastern Passage, are using Pleasant Street. This is NOT a negligible impact! Before approving anything, this needs to be addressed seriously. On a separate issue, While there is a reference to containment berms to contain AC in the event of a tank rupture, and I quote, The site will be surrounded by a berm that will provide additional containment in the unlikely event of a spill and to support surface water run-off containment, I note that there are no containment berms shown on the Site Plan provided in the report. What else are they glossing over? Name: Email: @gmail.com Address:

Municipality: Eastern Passage email_message: Privacy-Statement: agree x: 53 y: 28

From: [_hotmail.com](#)
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: May 31, 2020 5:13:03 AM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: I am a resident of Woodside, Dartmouth and am very concerned about the planned location of the Asphalt Storage Plant.

Traffic congestion is already a major problem when navigating Belmont/Portland Streets during the best of times. Opening a facility of this size and considering the added amount of traffic it will bring will be nothing short of a disaster!! I also am concerned about the lack of public awareness of this proposed project. Name: Email:

@hotmail.com Address:

Municipality: Dartmouth email_message: Privacy-Statement: agree x: 50 y: 20

From:
To: [Environment Assessment Web Account](#)
Subject: Regarding the construction of the liquid asphalt at 750 Pleasant street
Date: May 31, 2020 11:48:08 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Dear Madam/Sir ,

I am a resident of South Woodside, and I am writing to you in protest and against the construction of the Liquid Asphalt storage factory at 750 pleasant street .

It is unfair that such construction can occur without letting the government know ,as stipulated by Barbara Adams our representative MLA whom I have great respect for

This is a dense populated area . The smell and particulates generated by this activity can negatively impact the environment and poison the land and water, if spills or negligence at any time might occur during these industrial activities . Besides the pollution having lots of trucks going back and forth to this facility can impact the traffic and commute in the rush hour . Also such a facility can impact the tourism in the future because it will be an eye sore for the landscape of shore line seen not only from Dartmouth but also from Halifax . For years we have to put up with the fumes generated by Irving oil benzene and gasoline that poisoned the land and affected the air quality . Now that this is gone the business people who care only about getting wealthy decided to take advantage during the Covid 19 outbreak for not letting anyone know ,or vaguely mentioning after the deal was done ,the local population and the government when people where at home and not in touch with what is going on about your plans of this industrial development . This is very sad and disappointing for having no regards for the beautiful place that Eastern passage and Woodside area is . Lots of species trees ,birds and animals are in the Shearwater area and if there is ever an accident at the planned storage facility due to work negligence ,or natural phenomenon such as powerful storms this area will be totally devastated probably for years . I urge you to stop this development at once, or implement strict rules of safety with the assurance that will be no fumes , smells or particulates or leaks in the land , water systems etc . and with the clause that if in the future there are safety concerns and medical concerns of the population ,if anyone gets sick or develops severe allergies or other health problems that this facility will be closed and terminated immediately.

This deal of starting your operations after it was already signed and not letting anyone know especially the local government is an act of cowardice and I wanted to let you know how I feel and how many of my neighbours that I talked to feel as well.

Resident of Woodside for 12 years

Sent from my iPhone

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Regarding General Liquids Canada
Date: June 1, 2020 8:33:13 AM

-----Original Message-----

From: @hotmail.com>
Sent: June 1, 2020 12:09 AM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Regarding General Liquids Canada

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

To whom it may concern,

My name is _____, Nova Scotia. I'm writing in regards to the proposed General Liquids Canada facility at 750 Pleasant St. Dartmouth, Nova Scotia. I wanted to express my extreme disagreement to this facility being applied to this location. I have lived at my above mentioned address since 2008, and was unaware of the negative impact that the oil refinery would have on my life, when it was previously located at the proposed location. I was ecstatic when my community was informed of the dismemberment of the oil refinery, as there has been less pollution, making the air quality better, there is no longer a strong, unpleasant odor coming from there and I no longer have any health concerns. Also, with the refinery being gone it has had a positive impact on the property values of the surrounding areas.

I feel that the proposed use of the property will not only negatively impact the property values of my home and my neighbor's homes, but more concerning is the negative health implications that it means for the community and the terrible odors that will be caused as a result.

If this action is taken on this property, I feel that I would have no choice but to relocate out of the area, to protect myself and my health.

I hope that my above concerns will be taken into consideration to avoid this proposition from becoming a reality.

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Asphalt
Date: June 1, 2020 8:33:36 AM

-----Original Message-----

From: @gmail.com>
Sent: June 1, 2020 12:11 AM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Asphalt

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Literally just saw this thing about an asphalt centre on pleasant st in Dartmouth. Just wanted to voice a little concern over it? Wouldn't that stink up the neighbourhood it is particularly in, and cause a lot of noise damage? Most importantly, what's the environmental impact here?

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: June 1, 2020 8:36:20 AM

From: environment@novascotia.ca <environment@novascotia.ca>
Sent: June 1, 2020 8:11 AM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

Project: liquid-asphalt-storage-facility-project Comments: NO NO NO NO NO Its called Pleasant st not Disgusting st. I live near the bedford plant and it STINKS, its awful and ruins the area. This shit belongs in whoever is pushing this ideas house. Name: Email: Address: Municipality: email_message: Privacy-Statement: agree x: 60 y: 23

From: [Environment Assessment Web Account](#)
To: [Higgins, Jeremy W](#)
Subject: FW: Proposed Project Comments
Date: June 1, 2020 2:20:40 PM

From: @hotmail.com
Sent: June 1, 2020 1:46 PM
To: Environment Assessment Web Account <EA@novascotia.ca>
Subject: Proposed Project Comments

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: liquid-asphalt-storage-facility-project Comments: I disagree with MLA Adams May 8 request for 90 day delay for public response for liquid asphalt storage facility project and approve this development which fits great with Cherubini Metal Works, Autoport and oil storage tanks already in area while keeping property taxes minimal. The Nova Scotia Dept Environment and the developer went through the correct procedures and timelines and there is no valid reason for the project to held back because of covid 19 restrictions. The tragic deaths from HMCS Fredericton and of the RCMP officer\civilians from the Nova Scotia shooting should not be used here for political purposes.

Name: Email: [@hotmail.com](#) Address:
: Dartmouth email_message: Privacy-Statement: agree x: 61 y: 17



56300

Correspondence

Subject: Asphalt Facility

ENV ID: 56300

Priority: Normal

Premier's ID:

Date Written: 29-May-20

Date Received: 2020-06-01

From:

To Min/DM: Gordon Wilson, Minister of Environment

To Other:

Copied Min/DM:

Copied other:

Action Required:



Assigned To: Policy

Date Assigned: June 5, 2020

Due Date: June 12, 2020

Notes:

Approved by Deputy Minister: _____

Date _____

Reviewed by Executive Assistant: _____

Date _____

Approved by Minister: _____

Date _____

Reviewed by Communications: _____

Date _____

Date Close

JUN 01 2020

56300

NOVA SCOTIA ENVIRONMENT

May 29th 2020

Dear Mr. G. Wilson,

I am writing this hand written letter to you on behalf of my neighbours and myself on the notice I just received on this day May 28th 2020 that states as of Aug. 2020 operations will begin on a liquid asphalt storage facility project on 750 Pleasant St. Due to the Covid virus it has only become to our attention just days before knowing. We had no time to give our opinion which is negative to what I spoke with on our street.

MLA Barbara Adams is against this project and only notice was on May 1st in The Chronicle Herald I didn't know about it as I don't get the paper and there was too much more important news taking place at that time. Most neighbours in our area have lived here for many years and raised their families. We were happy to see the Draper Oil taken down and now you want to put up another problem. There will be far too much traffic on the 111 and it is already a problem without adding to it.

Please think very carefully on this decision. This is not acceptable or fair to your voters.

Thank you