

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Louisiana Pacific Canada Ltd.  
**PROPOSAL NAME:** Louisiana Pacific Canada Ltd.  
**CLASS OF DEVELOPMENT:** 1  
**TYPE OF DEVELOPMENT:** Oriented Strand Board Plant  
**CLIENT FILE NO.:** 3741.10

### **OVERVIEW:**

On January 19, 2009, Manitoba Conservation received a Proposal dated January 13, 2009, from Mr. Kevin Betcher, on behalf of Louisiana Pacific Canada Ltd. for increased emission limits associated with pressing and drying operations at the Swan Valley OSB Plant located at E1/2 16-36-25 WPM in the RM of Minitonas. Approval of the proposal would allow elimination of the regenerative thermal oxidizers which were originally installed for the control of volatile organic compound (VOC) emissions from pressing and drying operations. VOC emissions generated from drying operations have since been reduced through operational changes. Dryer particulate matter emissions will continue to be controlled by wet electrostatic precipitators.

The Department, on January 23, 2009, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Winnipeg Public Library, the Manitoba Eco-Network, the Millennium Public Library, the North-West Regional Library and the RM of Minitonas municipal office. Copies of the Proposal were also provided to the Technical Advisory Committee (TAC) members. A notice of the Environment Act proposal was also placed in the Winnipeg Free Press on January 31, 2009 and the Swan River Star & Times and Dauphin Herald on February 3, 2009. The newspaper and TAC notifications invited responses until March 4, 2009. The deadline date was subsequently extended to March 16, 2009.

### **COMMENTS FROM THE PUBLIC:**

The following is a summary of the comments that were provided in support of the proposal. Further details on the public comments submitted in support of the proposal are available in Appendix A of this report.

- Decommissioning the Regenerative Thermal Oxidizers (RTOs) will not result in a negative impact on air quality, human health, or the environment and will save LP significant amounts of money.
- Continued operation of the RTOs is putting LP Swan Valley at a business disadvantage.
- No other Canadian jurisdiction requires RTOs at an OSB plant.
- The viability of LP is important to the local economy.
- Decommissioning the RTOs will reduce greenhouse gas emissions.

The following is a summary of the comments that were provided to oppose approval of the proposal. Further details on the public comments submitted in opposition to the proposal are available in Appendix B of this report:

- The government should not have allowed LP to temporarily suspend operation of their RTOs. The public should have been consulted prior to granting this authorization.
- The proposal should be referred to the Clean Environment Commission (CEC) for review and intervenor funding should be provided.
- Existing pollution control equipment should not be removed or decommissioned.
- Emissions of toxic chemicals should not be allowed to increase.
- Economic struggles are not a justified reason to discontinue operating pollution control equipment. The financial state of a company should not come before the health of a community.
- LP has benefited from various government subsidies and therefore is not a competitive disadvantage as claimed.
- LP should investigate other cost saving measures besides discontinuing RTO operation.
- Information and data provided by LP cannot be trusted. Information from independent sources is required.
- LP should abide by their original commitment to operate RTOs in response to concerns raised during the original CEC hearings.
- More information on environmental and human health effects study on the area around LP in Minitonas should be available to the public. What are the test results?
- National ambient air quality standards are required in Canada.
- All wood products mills in Manitoba should be shutdown to give Manitoba forests a break from clear cutting.
- The effects of VOC emissions throughout the Province need to be investigated.

### Disposition

- In order to ensure public participation in the review of this proposal, it was designated as major alteration, requiring the complete Environmental Assessment and Licensing (EAL) process. This included public notification, full disclosure of the proposal details, the opportunity for the public to submit questions and/or comments regarding the proposal, and possible referral to the CEC.
- Manitoba Conservation completed independent evaluation of the environmental and human health effects of the proposal and concluded them to be acceptable according to current guidelines.
- Manitoba Conservation has reviewed the air dispersion modelling report submitted as a component of the Environment Act Proposal and is confident that it reflects local

conditions. The modelling completed for LP included local meteorological data. This enhances the accuracy of model predictions.

- Our review of the proposal included air dispersion modelling based on projected full scale operation. This modelling incorporated local conditions and indicated that there are no significant health or environmental impacts expected due to the proposal. The predicted ambient air concentrations of the modelled parameters were below the applicable ambient air criteria, and health effects analysis indicated acceptable risk.
- Environment Act Licence No, 2861 was issued on January 8, 2009 to authorize an interim operating scenario during which RTO operation would not be required. This authorization was based on a scientific review that concluded no significant environmental or health risk would be created. This Licence was posted publicly on the Environmental Assessment and Licensing webpage and at the applicable public registries. The Licence is only intended to apply during the current interim operating scenario, and therefore included a clause requiring Director review prior to June 1, 2009. This review concluded no changes were required at that time.
- The Environment Act Licence in place for LP requires ongoing ambient air monitoring in the vicinity of the plant. The results of the ambient air monitoring program are summarized in quarterly reports which have been reviewed by Manitoba Conservation and indicate compliance with Manitoba ambient air quality criteria. The Licence also requires water sampling, which has indicated acceptable water quality.
- Based on the past involvement of the CEC with respect to the use of RTOs and the significant public interest in this proposal, the CEC was asked to review the proposal and provide recommendations to the Minister.
- The CEC provided its report to the Minister on September 10, 2010.
- Comments related to forestry and pipeline projects are beyond the purview of this proposal review.
- A province wide review of VOC emissions is beyond the purview of this EAL Process.
- The new Environment Act Licence includes clauses that address the recommendations of the CEC

#### **COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:**

##### **Canadian Environmental Assessment Agency**

No concerns.

##### **Disposition:**

No action needed.

## **Manitoba Conservation – Environmental Assessment and Licensing Branch**

Additional air dispersion modelling of PM2.5, PM10, acetaldehyde, acrolein, propionaldehyde, and methanol has been requested in order to provide further confidence that the environment and human health will not be significantly impacted.

### **Disposition**

Additional modeling activities were completed and concluded there are no significant environmental or human health effects expected.

## **Manitoba Conservation – Parks and Natural Areas**

No concerns.

### **Disposition**

No action required.

## **Manitoba Conservation – Pollution Prevention**

The following comments relevant to the proposal were received:

- Based on the submitted documents, the company is proposing: (1) amendment of the emission limits to the WESP stacks, (2) amendment to the emission limits of the press vents, and (3) demonstrate that the proposed changes (ex. Decommissioning of RTOs) will not result in significant impact to the surrounding environment and community health.
- To justify the proposed amendment of the emission limits for the dryer WESPs, the company undertook an air dispersion modelling which indicated that there will be no significant impact to the environment and health. However, on said model run, it assumed a stack height (common for all dryer sources) of 49.5 meters. Unless that proposed stack is constructed and in operation, the modelling results will not support the amendment request for the emission limits.
- The air quality guidelines have considered odour nuisance impacts (if any) of the specified parameters. Considering that the predicted concentrations and the results from ambient monitoring are below the prescribed guidelines, the potential for odour nuisance have been addressed.
- My main concern is that the model run was based on the assumption that the emission release was from a 49.5 metre high stack. In the absence of the 49.5 metre stack, it is reasonable to assume that concentrations will be much higher than the modeled results under normal circumstances.

- Frequency of sample collection for MDI, phenol and hydrogen cyanide should increase to the weekly schedule (one 24-hour integrated sample every sixth day) from the current quarterly schedule.
- Frequency of sample collection for formaldehyde should be increased to at least 24, 1 hour samples every sixth day or some type of random distribution for determination of the sampling times for the individual hourly samples (from the current one 1-hr sample every sixth day).

Disposition:

Environment Act Licence No. 2954 addresses the identified concerns.

**Manitoba Conservation – Sustainable Resource & Policy Management**

The Sustainable Resource & Policy Management Branch has reviewed the above EA proposal and recommends that Louisiana Pacific Canada LTD (LP) monitor the effects of the Swan Valley Oriented Strand Board (OSB) plant's ground level ambient concentrations of emissions on Cowan Bog Ecological Reserve, and mitigate any adverse effects that may occur from these emissions to ensure this ecologically valuable wetland remains intact.

For your information:

- The Cowan Bog Ecological Reserve was designated in 1983 and is a part of Manitoba's network of protected areas. Protected areas are legally designated areas that do not allow logging, mining, or hydro electric development, oil or gas development, or any other activities that may adversely affect habitat.
- The Cowan Bog Ecological Reserve lies approximately 16km east of LP's Swan Valley OSB plant. While its location lies outside the extent of ground level ambient concentrations of emissions indicated by the dispersion modeling supplied by LP, areas draining into the Ecological Reserve fall inside this extent. Any activity affecting the waters flowing into the bog may adversely affect it, compromising its ecological integrity and the reasons for which the Cowan Bog Ecological Reserve was created.
- The Wetland Protection and Restoration Initiative, announced in the 2008 Throne Speech, recognizes the enormous value of wetlands for biodiversity, for retaining nutrients, for regulating prairie water tables and for reducing greenhouse gas emissions. Recent studies value the services provided by these wetlands as high as \$24,330 per hectare per year.

Disposition

Environment Act Licence No. 2954 addresses the identified concerns.

## **Manitoba Culture, Heritage and Tourism – Heritage**

The Historic Resources Branch has no concerns with regard to this project's potential to impact heritage resources.

If at any time however, significant heritage resources are recorded in association with these lands during development, the Historic Resources Branch may require that an acceptable heritage resource management strategy be implemented by the developer to mitigate the affects of development on the heritage resources.

### **Disposition:**

No action needed.

## **Manitoba Health**

The following is a summary of the comments provided:

The above Proposal indicates that it “clearly demonstrate(s) that the proposed changed in emission limits will not result in significant impact to the surrounding environment and community health”. The Proposal outlines the results of dispersion modeling of total facility emissions and an assessment of ambient air quality parameters to demonstrate that there will be no significant impact on human health or the environment.

In general, it seems to make sense that the LP Canada Ltd Swan Valley OSB Plant be held to the same emission limit standards as that of other similar industries throughout the province/country.

Regardless of the decision re the proposed amendments to the emission limits, I agree with the continuation of the existing ambient air quality monitoring program.

### **Disposition:**

Environment Act Licence No. 2954 addresses the identified concerns.

## **Manitoba Infrastructure and Transportation (MIT)**

No concerns.

### **Disposition:**

No action needed.

## **Manitoba Science, Technology, Energy and Mines – Mines Branch**

No concerns

Disposition:

No action needed.

**Manitoba Water Stewardship**

The following comments were provided:

- *The Water Rights Act* indicates that no person shall control water or construct, establish or maintain any “water control works” unless he or she holds a valid licence to do so. “Water control works” are defined as any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert borehole or contrivance for carrying or conducting water, that temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, OR changes or may change the location or direction of flow of water, including but not limited to water in a water body, by any means, including drainage. If a proposal advocates any of the aforementioned activities, an application for a Water Rights Licence to Construct Water Control Works is required. Application forms are available from any office of Manitoba Water Stewardship.
- The proponent needs to be informed that if the proposal in question advocates any construction activities, erosion and sediment control measures should be implemented until all of the sites have stabilized.

Disposition:

No action required.

**PUBLIC HEARING:**

The proposal provided technical information indicating that the proposed increased emission limits would not create a significant negative environmental or human health effect. The comments submitted in opposition to the proposal were based on a principle of opposition to increasing emissions and did not identify any shortcomings in the scientific method followed in the proposal.

However, based on the past involvement of the CEC, particularly with respect to the operation of RTOs, as well as the significant public interest in the proposal, the CEC has been asked to review the proposal and provide recommendations to the Minister. The CEC investigation will include a public meeting in the community.

**RECOMMENDATION:**

Issue Environment Ace Licence 2954 which includes terms and conditions necessary for environmental protection and was prepared in accordance with the CEC recommendation.

Enforcement of the Licence should be assigned to the Western Region of Manitoba Conservation.

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May 14, 2009, Updated March 16, 2011

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# **Appendix A**

## **Comments Submitted in Support of the Louisiana Pacific Environment Act Proposal**

## **Letters of Support – edited for spelling and format**

Michael Anderson, Guy Bardwell, Dennis Bartko, Bartley Beals, Myles Beals, Chad Behrmann, Michael Bender, Dave Bertram, Tyler Boychuk, Sheldon Braneonwier, Stacey Brunce, Darren Chmelowski, Chris Chmelowski, S. Chmelowski, Janelle Delaurier, Jess Cords, Taryn Cords, Don Currie, Jason Delaurier, Justin Delaurier, Leon Delaurier, Lois Delaurier, Scott Finlay, Jay Gorchynski, Randy Gulka, Harley Haas, Gary Hominuk, Gerry How, Scott Mariciak, Scott Martin, David Mullin, Ian Mullin, Trent Parker, Darryl J. Sabiston, Lyle Sagert, Barrie Sorrell, Shane Spencer, Brent Stephen, K Sutherland, Gordon Terry, David Wowk, Laurie Young, and others with illegible signatures (total of 60 letters received) submitted the following:

Please accept this as a letter of support for the above noted request. First of all, thank you for granting LP Canada a temporary shut down of the R.T.O. Units while the appeal is being considered.

The employees understand that this request will not have a negative impact on the quality of the air in our area. The removal of the RTOs will save Swan Valley O.S.B. plant significant amounts of money, therefore providing the opportunity to continue the operation of the local plant, while meeting environmental and social compliance responsibilities. We are all aware of the economic struggles and that a reduction in operating costs could help this plant stay open and operating in the future. There is no other OSB mill in Canada that operates an RTO to control volatile organic compounds, which puts our mill at a significant cost disadvantage. The local economy relies on the income of workers, either directly or indirectly and some may not be able to stay in business should the costs become too high for LP Canada to continue operating in the Swan River Valley. The consequences of this mill having to shut down in the area would be devastating. Approval of this proposal will be positive for the local economy and the environment. I urge you to approve the proposal.

Kim LaCarte: I am a resident of Swan River now for 3.5 years. The value of Louisiana Pacific is evident in so many facets of this community. LP supports a multitude of events/activities/charities etc, all to benefit the people of the valley. Employment for direct and indirect is in the neighbourhood of a 1000+ jobs from loggers to skating coaches and retailers - all have gainful employment as a result of having this industry in the valley.

As for the impact of the RTOs, this requirement placed on the business is crippling in this economy. The OSB industry for MB is at a total disadvantage with respect to other Canadian OSB facilities. No other OSB business in Canada is required to operate and maintain this multi million dollar expense. The research and data support that the human impact is extremely limited. Other provinces in our country have figured out that based on facts and data it is not necessary to maintain the burden of RTOs why can't we?

I have lived in a small community and worked for the OSB industry in Ontario, they did not have RTOs but had stacks as is now suggested for LP as the alternative. This OSB plant was located less than 1 km from a town of 2000. There were no health impacts on that community, and I still have family there 25 years after they began production. That industry is what is keeping the community alive, after the closing of a local mine, the railroad shops, ministry of natural

resources base.....manufacturing OSB is an industry that has longevity and prosperity for our community and province.

LP is working in partnership with CTT to provide training and employment opportunities to this community and we believe that the impact of a negative impact decision on the RTOs may influence this

I urge our government to make the decisions that will enable LP to continue operation during this economic crisis and long into the future with a sustainable renewable wood supply. Markets will rebound as they always do, we want to see that success in our valley and our province. We have what it takes to compete with the rest.

Town of Minitonas: The Minitonas Town Council would like to offer their support for the above noted request. It is understood that this request will not have a negative impact on the quality of the air in our area. The removal of the RTO Unit will save LP Canada's Swan Valley OSB Plant a significant amount of money, thus providing the opportunity to continue the operation of the local plant. During this time of economic struggles it is imperative that the Minitonas Town Council offers their support for a reduction in operating costs that could help this plant stay open and operating in the future. There are many residents in our Town and the local area who rely on their income, either directly or indirectly, from the Minitonas Plant and could not continue to live here, should the costs become too high for LP Canada to continue operating in the Swan River Valley.

The package sent to our office, which provides details on the proposal for increased emission limits, has been placed on display at our municipal office. This will allow the public an opportunity to review the report.

Thank you for granting LP Canada a temporary shut down of the RTO Unit while the appeal is being considered. This will offer temporary financial relief for the local plant, and will be an opportunity for them to test air qualities while the RTO Units are not in operation.

RM of Minitonas: The Council of the Rural Municipality of Minitonas wishes to offer their support for the above noted request. It is understood that this request will not have a negative impact on the quality of the air in our area. The removal of the RTO Unit will save LP Canada's Swan Valley OSB Plant a significant amount of money, thus providing the opportunity to continue the operation of the local plant. During this time of economic struggles it is imperative that the Minitonas Council offers their support for a reduction in operating costs that could help this plant stay open and operating in the future. There are many residents in our local area who rely on their income, either directly or indirectly, from the Minitonas Plant and could not continue to live here, should the costs become too high for LP Canada to continue operating in the Swan River Valley.

The package sent to our office, which provides details on the proposal for increased emission limits, has been placed on display at our municipal office. This will allow the public an opportunity to review the report.

Thank you for granting LP Canada a temporary shut down of the RTO Unit while the appeal is being considered. This will offer temporary financial relief for the local plant, and will be an opportunity for them to test air qualities while the RTO Units are not in operation.

Town of Swan River: This letter is to indicate that the Town of Swan River supports Louisiana-Pacific's application to amend the emission limits from the pressing and drying operations at its Minitonas oriented strand board plant.

It seems unfair in a competitive market that the Louisiana-Pacific plant is required to operate Regenerative Thermal Oxidizers when no other OSB plant in Canada is required to do so. Scientific information indicates that decommissioning of the RTOs will have no significant impact on human health or the environment.

Also, with the reduction of natural gas consumption there will be reductions in greenhouse gas emissions which will benefit the environment. This is viewed as a "win-win" situation with the continued operation of the plant contributing significantly to the local economy through continuation of the 150 jobs associated with the plant, plus a reduction in the production of greenhouse gases which contribute significantly to global warming.

Swan Valley Enterprise Centre Inc.: As the economic development office for the Swan Valley region, the Swan Valley Enterprise Centre (SVEC) supports the removal of the RTO units at the Louisiana-Pacific facility located in the RM of Minitonas.

Prior to providing our support, careful consideration was given to how the removal of the RTOs could impact the environment and regional economic health, two key elements of holistic economic development.

The Swan Valley LP facility has consistently illustrated its commitment to a healthy environment. To our understanding, it is the first and only facility in Canada that has RTOs installed and since the facility was constructed, a significant investment has been made in equipment to reduce emissions at the source which therefore further reduced any perceived value of an RTO system.

The research and information available indicates that the removal of the RTOs will still result in air quality that is well below the applicable criteria. In addition, the Federal Government does not promote the use of RTOs due to the negative environmental impact. In fact, under GHG regulations, the facility could potentially be monetarily penalized for operating RTO technology. Health Risk Assessment and modeling has shown there to be no significant impact on either human health or the environment with the elimination of the RTO units.

In regards to the local economy, the facility directly employs 150 people and indirectly supports the jobs of an additional 550 individuals; payroll from these jobs further supports our local product and service providers. This makes LP vitally important to our region of 11,000 people. LP has always been a very positive and socially responsible member of our corporate community and supports several local events, activities, and organizations each year.

During these challenging economic times, LP is employing several strategies to continue operations and to not follow the path of several North American facilities which have temporarily or permanently ceased operations. The elimination of these units will be of tremendous assistance in ensuring the facility and its jobs continue to provide economic support to our region.

In closing, the Swan Valley Louisiana Pacific facility has a demonstrated history of taking actions to protect the environment. The decommissioning of the RTO units is consistent with this history of responsible environmental stewardship and will not have a negative impact on the environment. The decommissioning will, however, provide significant cost savings to the facility both now and in the future, resulting in the company being in a much better position to continue operations and be a positive contributor to the rural Manitoban landscape.

United Steelworkers Local 1-324: On behalf of Local 1-324 of the United Steelworkers we wish to send this letter outlining our support for Louisiana Pacific's request for an amendment to its environmental requirements.

Currently there is a temporary shut down of the R.T.O units while the appeal is being considered which we wish to express our thanks.

In concert with responsibilities which have exceeded environmental requirements compared to other wood products plants in Canada this company has fulfilled its obligations to date which were mandated.

“No other OSB manufacturer in Canada has to comply with such environmental standards which in order to be in compliance with amount to over three (3) million dollars annually. Within the next three years it will require a capital expenditure replacement cost of over ten (10) million dollars to comply with Manitoba's environmental standards, which exceed every jurisdiction where OSB is manufactured in Canada”.

We understand as workers the importance of protecting our environment in ways that are necessary to prevent harmful exposure. However if we can do it via a less costly, and effective way as per a 49.5 meter stack which satisfies the requirements for air quality we know that now more than ever we need it to happen.

The Forest Industry is facing hardship unlike ever before seen. Hundreds of jobs are at risk. This employer is asking for relief to aid it in surviving. We as workers again encourage you and your department to grant the relief in the form of amending the emission limit requirements to assist the operation in surviving during these most dire of times, while still complying with environmental standards.

## **Appendix B**

# **Comments Submitted Opposing Approval of the Louisiana Pacific Environment Act Proposal**

## **Letters of Opposition – edited for spelling and format**

Evan Anderson: Taking pollution controls offline is not the answer!

Willow Aster: I vociferously object to the province even considering Louisiana-Pacific's request to take their pollution controls offline. If their business isn't viable given modern pollution-control laws, their business should not be operating. What they said in the press today regarding "trees growing all the time" showed a scandalous disregard for a contemporary understanding of modern forestry practice: trees are not considered a renewable resource, nor is natural gas. I vote for even stricter pollution controls. This may force them to do the burden of care and research into better methods instead of unfunded citizen groups.

Anne Barr: am writing to express my concern for the Government of Manitoba granting a request from Louisiana Pacific Canada to reduce its use of Regenerative Thermal Oxidizers which reduce its volatile organic compound emissions. Volatile organic compounds are known to be toxic and every effort should be made to reduce their release into the atmosphere.

I urge that you hold Clean Environment Commission hearings on this issue, in order that the citizens of Manitoba be aware of it and have an opportunity to have input into the decision.

In the mean time I would ask that the government revoke the decision of January 29th to allow this regressive step.

Jen Belhumeur, Melody Bell, Norman Boymook, Darlene Brown, Rob Buchanan, Michelle Buck, Tammy Chief, K. Clarkson, Erin Clouson, Tammy Connelly, Marv Copeland, Jill Eggie, Gary Fiks, Bernice Gordon, Myrtle Hart, Dorothy Harvey, Bill Hildebrand, Marilyn Johnston, Iris Jonsson, Maria Kent, Brian Key, Barbara L'Ablé, Barbara Lewis, Suzanne May, Jo McKnight, Clara Lausman, Dennis Lynes, Alice McKim, Sherry Mellor, Ed Miller, K Miller, Mary Nemecheck, M. Nemechek, Sharon Oman, Melba Parker, Fay Perrin, Janel Sagert, Jordan Sagert, Vivian Sagert, Lorraine Seib, Diana Taylor, Lew Taylor, Judy Woytikiw, Candace Wozmiuk, Jen Zamzow and others with illegible signatures (90 total) signed the following petition: RTOs serve to control the emission of toxic contaminants in the atmosphere, which can include benzenes, volatile organic compounds, phenols, formaldehyde, hydrogen cyanide, and methylene diphenyl isocyanate. These toxic chemicals are carcinogenic, and cause serious and persistent health problems for embers of our community.

We, the undersigned, are community members whose health is negatively impacted by the decision to have RTOs shut down. We are requesting that the Minister of Conservation deny LP's request to permanently shut down RTOs. We would also request the Ministry review the processes which are already in place, that have allowed, even temporarily, the financial state of a company to come before the heath of a community.

Jon Benson: I am writing to you today to express my outrage about the possibility of Louisiana Pacific being granted permanent discontinuation of the RTO pollution control system. The fact that they were previously granted a temporary discontinuation is an outrage in itself!

Louisiana Pacific has even come out and admitted they anticipate increased emissions at the mill, to allow something like this to go through would be favouring dollars over the health of Manitobans.

I hope to hear in the near future that this request has been denied and that more strict controls will be placed on Louisiana Pacific's emissions.

Boreal Forest Network: As the Executive Director of the Boreal Forest Network, I am writing to you to strongly oppose the request made by Louisiana Pacific Corporation (LP) to seek approval under the Environment Act to permanently decommission its three Regenerative Thermal Oxidizers (RTOs) and increase toxic emissions at its Oriented Strandboard (OSB) facility in Minitonas, Manitoba.

Also, the Boreal Forest Network was deeply disappointed to learn that LP has already received approval from Manitoba Conservation to temporarily suspend operation of its RTOs at its OSB facility in Minitonas until June 2009 without any prior public notification.

The rationale given by LP to request that Manitoba Conservation amend Manitoba Environment Licence 1900 S4 to allow its OSB facility in Minitonas to permanently decommission its RTOs and seek an increase in emissions of Formaldehyde, Benzene, Volatile Organic Compounds (VOCs), and Methylene Diphenyl Isocyanate (MDI), all highly toxic chemical compounds, is based purely on economic factors and are weak at best.

In LP's submission, dated November 18, 2008, to Manitoba Conservation (page 4) states that the RTOs were installed to "alleviate concerns raised by a small group of citizens opposed to its OSB facility in the Swan Valley."

I can attest, having been one of those concerned citizens in 1994, that legitimate human health concerns were raised by not only local citizens living near the proposed plant in Minitonas, but by national and regional organizations, by the Manitoba Lung Association, the MFL Occupational Health Centre, from the United States Environmental Protection Agency (EPA) and numerous other expert witnesses that provided testimony at the Clean Environment Commission hearings that were held on LP's original Environmental Licence application for the construction of its OSB facility in Minitonas in 1994.

In fact, LP only capitulated to install the RTOs in 1994 when the Federal government threatened to intervene and call for a full panel review of the plant under the Canadian Environmental Assessment Act and when numerous concerns were raised in the Manitoba Legislature by the New Democratic Party, the Official Opposition at the time.

LP does note in its November 18, 2008 submission to Manitoba Conservation that in 1994 "all applicable ambient air quality criteria would be met without the RTOs." (pg. 4)

While I agree that LP is somewhat correct in its statement, it is only true because there was and still is no national ambient air quality standards for Canada and hence no legislative mechanism to require that the best available pollution abatement technology be installed to effectively deal with the Canadian Environmental Protection Act (CEPA) list of toxic substances such as those that are emitted on a daily basis at the LP OSB facility in Minitonas.

Hence, the lack of political will on the part of the provinces and the federal government to institute any national ambient air quality standards is hardly a legitimate argument for not meeting standards that LP must meet in all of its facilities in the United States.

In my view, as a precautionary measure and until such a time that there are national ambient air quality standards in place in Canada, the Manitoba government should adopt the EPA standards as an interim measure. To do otherwise and possibly jeopardize the health of our citizens would be morally and ethically repugnant.

While I can empathize somewhat with the dismal economic state in which the Oriented Strandboard industry find itself currently, finding ways and means to reduce the industries input cost should not come at the expense of protecting human health and the environment.

The LP facility in Minitonas has already received a number of subsidies that reduces their costs of operation, for example;

- Various levels of governments fully subsidized the cost of constructing a natural gas pipeline to the region for the primary purpose of insuring the operations of the RTOs.
- A by-pass was constructed around the Town of Swan River by the government so that logging truck traffic going to the LP facility in Minitonas would not disrupt the lives of the citizens of Swan River.
- The stumpage fees paid by LP and set in its Forest Management Licence Agreement are well below the stumpage fees paid by other similar facilities producing OSB in other Canadian jurisdictions.

I suspect, upon further investigation, there are more and many more subsidizes are likely forthcoming from various levels of governments in the very near future to alleviate the economic slump in the OSB industry that the LPs facility in Minitonas will be able to take full advantage of.

LP states in its submission of November 18, 2008 to Manitoba Conservation that because the LP OSB facility in Minitonas is the only OSB facility in Canada to have RTOs that this puts them at a comparative cost disadvantage with other OSB facilities in Canada. (pg. 4)

LP further states that the costs (according to LP \$3.2 m) they must absorb by operating these RTOs at the Minitonas facility are prohibitive. Costs such as electricity, natural gas and maintenance were the three primary ones cited.

LP knew full well what the costs, (based on the costs of operating RTOs in its OSB facilities in the US) were of running RTOs when they initially agreed to install them at its OSB facility in Minitonas in 1994.

It was for this precise reason that they strongly resisted installing the RTOs in the first place. All of LP's OSB facilities in the United States still require the operation of the RTOs or an EPA approved equivalent technology, this despite an even worse economic down turn in the US.

In fact, most of the OSB facilities currently operating in Canada, most are US based companies, saw an opportunity in 1990s to build new OSB facilities in Canada precisely because of Canada's lack of national ambient air quality standards, our low stumpage fees and far inferior environmental assessment process when compared to operating parameters OSB facilities have to abide by in the US.

While I agree that LP OSB facility in Minitonas is the only such facility in Canada to require RTOs. However, it is absolutely ludicrous for LP to state that it should no longer be required to operate them at its Minitonas facility for this reason.

I would like to think that as Manitobans we have set a standard for pollution abatement equipment to control ambient air pollution that other provincial jurisdiction should aspire to meet, rather than be forced into a race to the bottom because one company has requested we do so.

If other provinces choose not to require the OSB industry to install the best available pollution abatement technology available in their provincial jurisdiction to control the toxic and potentially harmful emissions associated with the production of OSB, so be it. But, this line of argument should certainly not be used as a justification for the government of Manitoba to give LP a pass to do so at its Minitonas facility.

Surely, I would think, with the assistance of the government of Manitoba, that LP could very easily renegotiate a more favourable rate (over the short term) for the purchase of natural gas and hydroelectricity from Manitoba Hydro without having to resort to putting human health at risk.

Should people become ill as a result of the highly toxic emissions associated with LP's OSB facility in Minitonas, the government will ultimately have to absorb these costs through our government funded universal health care system.

I suspect the real reason, identified on page 4 of its submission, for LP's request to decommission its RTOs permanently at its facilities in Minitonas is because they face the prospect of having to replace the RTOs at the Minitonas facility in the near future at a cost of \$10 million dollars. A cost I might add that LP is more than willing and must bear in the US. But because RTOs are not a legal or a regulatory requirement here, or for that matter anywhere in Canada, LP wants to be absolved of bearing those costs here by the government of Manitoba.

In fact, the RTOs at the LPs OSB facility in Houlton, Maine were replaced recently with new RTOs because "Louisiana Pacific's decision to upgrade its RTO technology hinged in large part on improving operating costs."

**See link for more details:** <http://www.pollutiononline.com/article.mvc/Louisiana-Pacific-Chooses-MEGTEC-To-Upgrade-R-0001>)

In short, the new RTOs at this LP facility in Maine require less maintenance, less energy to run and little or no down time – more cost efficient in other words.

LP has stated that it has installed new Wet Electrostatic Precipitators (WESP), the only pollution abatement equipment to control particulate matter should the RTOs be decommissioned, that will be more than sufficient, in LP's opinion, to control emissions.

In the US LP has installed WESP at two of its OSB plants but they are in conjunction with RTO technology at these plants to control particulate emissions.

**See link for more details:** <http://www.chem.info/ShowPR.aspx?13764&CommonCount=0>

Rather than giving LP approval to decommission its RTOs permanently at its facility in Minitonas, maybe LP should be instructed by your Department to replace its dated RTOs with those new RTOs now installed in its facility in Houlton, Maine, so as to alleviate the costs of running its old and inefficient RTOs in the Minitonas facility.

While I would like to be in a position to comment extensively on LP's ambient air quality modeling assumptions based in its submission of November 18, 2008, I, along with others who have concerns, do not have the financial resources to hire outside independent experts to assess neither the data nor the modelling assumptions provided by LP.

It should be noted that LP conducted all of the dispersion modelling assessment data itself and no independent third party expertise, and not paid for by LP, was asked to assess the assumptions made by LP in its dispersion modelling assessment.

I would note, however, LP has a past track record of under reporting its emissions that is well documented. I am highly suspicious of any data that this company presents given that LP has been caught in the past in violation of EPA's emission standards. In fact, LP was most recently cited for violation infractions by the EPA in 2006.

In conclusion, I expect that the health and welfare of our citizens is no less important than the health and welfare of those citizens who reside just south of the border from us.

If the citizens to the south of us can be accorded, by its government, measures that ensure that their health and safety is securely protected, then why can we not expect to be accorded the same protection by our own government?

Why must citizens in Manitoba be writing to you to advocate for something that already exists and should be maintained?

Why should we in Manitoba absorb the potential health care cost that may result by LP receiving approval to decommission permanently a proven technology that is known to effectively mitigate

highly toxic emissions, effecting human health, that are emitted daily at the LP facility in Minitonas?

Why should citizens of Manitoba accept the lowest possible standards in order to attract industry to our province?

Why is it that LP made a number of commitments to Manitoba in 1994 and is now backing away from those commitments? Are we to expect that corporate commitments to protect human health and the environment to governments are only good when the economy is healthy!

Should the cost of doing business in Manitoba compromise the health and welfare of the citizens of Manitoba and should human health be diminished simply because one cannot afford those costs any longer?

I think that LP has been given an inch, let us not now allow them to take a mile in the process.

Therefore, I humbly implore you as the Minister responsible under the Environment Act that you use your discretionary powers under the Act and deny LPs request to decommission its RTOs permanently at its facility in Minitonas.

Paloma Corrin: I am writing to voice my concern that Louisiana Pacific should not be able to alter the Environment Act so as to allow the discontinuing of their use of Regenerative Thermal Oxidizers (RTOs) for the control of Volatile Organic Compound (VOC) emissions and other toxic substances.

It is important that the Manitoba government acts transparently in regard to this issue and fully investigates the effects of VOC emissions across the province through a Clean Environment Commission hearing on the matter. This must be done in order to protect the health and safety of the public.

At minimal we need an immediate revocation of the interim approval unilaterally granted by Minister Stan Struthers (January 8, 2009) to Louisiana Pacific to cease the use of RTOs.

Lindy Clubb: I was one of the presenters during the original licensing Hearings held by the Clean Environment Commission when Louisiana Pacific was invited to log in Swan River. I have been a frequent visitor to the area in the many years since then. In addition, our group owns and operates a field station due south of the plant on Wellman Lake and we have voiced concerns about the combination of agricultural, cosmetic and industrial forestry chemical use and its effects on our surrounding air, water and land.

I have additional concerns about LP's proposal for eliminating RTO technology, to save the cost of controlling air emissions with technology. Part of the rationale for adopting RTO technology came from the cancer statistics in the Dawson Creek valley area of B.C. where LP had a plant. Swan is a valley also. I haven't heard a voice from Minitonas, the closest population to the plant. It is those people that will be suffering the risks of exposure to chemicals. Without proper, informed public consultation with this community I don't think LP should be allowed to proceed.

I did read the attachments forwarded by LP about comparing the expected emissions to EPA standards and Manitoba air quality standards. What I didn't see was local, reliable, recent statistics on the chemical amounts on or in the soil, the water in the nearby Favel River, or in the air during the hours they refer to in the report. Models are a good tool for prediction as long as they fit the scenarios, and they apply to local conditions. I do not see local conditions as a factor in these reports.

Where are the test results from LP or their consultants that would allow me to NOT have concerns about air quality and soil contamination from eliminating the technology that was put in place for safeguarding human and environmental health? Furthermore, what changes have been made at the plant so that Mr. Betcher can make the claim that emissions have been reduced to safe levels? I prefer a lot of information to little information and assurances that are based on the need to save costs. I've been in the plant and can appreciate the efficiency that employees brought about to reduce the need for wood, but the emission reductions weren't mentioned until the profits began to dwindle.

What assurance do I have that the people of Swan Valley won't be paying the costs in the long run? Jobs are important, but LP made a commitment for their operations to be sustainable, not just sustained.

Dauphin Fish & Wildlife Association: Before LP could set up a plant, the government of Manitoba issued LP an emissions license. Even though there have been improvements within LP plant operations, with these increases in emission the effect will be felt right through the food chain, from the insects, to marine life, the domestic animals and also the wildlife in our forests, we (Dauphin Fish & Wildlife Association) feel there is no justifiable reason that LP should be allowed to increase the amount of harmful emissions released. The economic downturn, has affected everyone, and this should not be used as an excuse to increase emissions. The license that was granted to LP, at the start, was part of the package to do business in Manitoba. We value our clean air. Once the toxins are released into the air there is no way to recapture them.

As conservationists we value clean air. Clean air is synonymous with country living. As a society we cannot allow unnecessary increases in air pollutants which lead directly or indirectly to increases in cancers, smog, and greatly reduce life spans.

One of the VOCs is formaldehyde which is water soluble. As such it is trapped as a pollutant in snow, run off and rain fall. This will affect all sorts of insects and marine life. Low concentrations of chemicals such as formaldehyde, benzene, and MDI will harm insects, aquatic life and wildlife.

The VOCs end up in plants and forests and may very well be contributing to a decline in bird populations across North America, as well as the declining reptiles such as the leopard frog.

It is frightening to think we could allow an increase in benzene and MDI, which will end up in our drinking water and lakes. Benzene is a well known carcinogen. If we allow the increase in emissions, undeniably the remnants will show up in our lakes, streams, local drinking water and aquifers 1000's of kilometres away. Can we justify doing this to our future generations. After

all, safe, clean, unpolluted drinking water is one of Canada's most valuable assets. There is a fast increasing shortage of safe drinking water around the world. To allow this increase in VOCs would have a direct impact upon people who have respiratory problems (asthma, emphysema). The long term effects on people and domestic animals will take years to determine. How can we take the risk? After all if we do not take care of our planet we live on, where are we going to live?

As many of our members who have homes around LP in Minitonas, cottages at the lakes in the Duck Mountains, we cannot justify or accept any added pollution to our waters, clean air, our lands where we grow our food and crops, filter our drinking water, nurture our domestic animals, fish and wild life.

We must preserve what we have, love, and enjoy in Manitoba. We cannot accept adding more pollutants to such a pristine area for the sake of a few dollars (during the recession).

Drew Fenwick: It has come to my attention that a request from Louisiana Pacific Canada Limited has been made to the Ministry citing tough economic times, on January 29, 2009, to alter the Environment Act so as to allow the discontinuing of their use of Regenerative Thermal Oxidizers (RTOs) for the control of Volatile Organic Compound (VOC) emissions and other toxic substances.

It is imperative that the environment and the health of Manitobans not be sacrificed in view of operational difficulties and costs in a short term view. These regulations, provisions and requirements of the act exist for a reason. To fail in diligence now is a false argument and irresponsible on the part of the company and by granting of interim approval of relief from the provisions of the act.

I will be writing shortly to the papers and the media to alert them to this and to Minister Struthers unilateral granting of interim approval of relief from these provisions to cease use of RTO.

This decision needs to be revisited.

Stephanie Fulford: I am the representative of Nature Manitoba (formerly Manitoba Naturalists Society) on the Louisiana Pacific Stakeholders Advisory Committee. I have represented Nature Manitoba in this capacity for the past five years, and try to follow closely the forestry and mill activities in this region. I have strong ties to the Swan Valley region, with family members living in the area, and a family cabin in Duck Mountain Provincial Park. As such, I was deeply concerned to hear of the shutting down of the Regenerative Thermal Oxidizers, and the application to permanently decommission this technology.

I find it extremely troubling that requirements put in place as a result of the Clean Environment Commission hearings which involved significant public consultation and input were so quickly set aside by Manitoba Conservation. A decision that potentially carries such serious environmental and human health impacts needs to be made using as much information as possible. Certainly some of this information should be from independent sources, and should be fully available to concerned parties and citizens. So far, this has not been the case.

I am not convinced that decommissioning the RTOs at the Minitonas plant is the right thing to do for the environment and for the citizens of Manitoba. Furthermore, to justify this decision using a temporary economic situation is a dangerous precedent to set for the environment in Manitoba.

I trust that these concerns will be taken into consideration when reviewing the licence amendment request.

The Green Party of Manitoba: The Green Party of Manitoba (GPM), on behalf of all Manitobans, is contesting Louisiana Pacific Canada Limited's request of January 29, 2009, to alter the Environment Act so as to allow the discontinuing of their use of Regenerative Thermal Oxidizers (RTOs) for the control of Volatile Organic Compound (VOC) emissions and other toxic substances. Louisiana Pacific is also seeking an increase in their allowable emissions limits, in the processing of oriented strand board (OSB) at their plant located in Rural Municipality of Minitonas, Manitoba.

The GPM is calling for the Government of Manitoba to act in a transparent manner on this issue, by ensuring that public Clean Environment Commission (CEC) hearings take place across Manitoba regarding the use of RTOs in the manufacturing of OSB products at Louisiana Pacific Canada's Swan River plant. Furthermore, the Government of Manitoba needs to grant intervenor funding to all interested parties, to ensure first and foremost that the public is able to protect its interest. We are also calling for an independent overview of the efficacy of RTOs as well as an exhaustive account of the public health and ecological risks associated with VOC emissions.

Until these hearings are concluded, the GPM is also calling for an immediate revocation of the interim approval unilaterally granted by Minister Stan Struthers (January 8, 2009) to Louisiana Pacific to cease the use of RTOs.

Morgan Hoogstraten: Economic Troubles are not an excuse to abuse the land that we live off of! My name is Morgan Hoogstraten, and I am emailing you on behalf of the permanent shut down of Louisiana Pacific's RTO pollution control systems! I object!

If we cannot care for our world, it will not care for us!  
The earth will live on forever, but how long can we sustain ourselves upon it?!

I know you will do the right thing!

Al Hunter: Do not allow the permanent shutdown of Louisiana Pacific's RTO pollution control systems. Do not allow the province to compromise human health in this way.

The permanent shutdown of the pollution control systems of an industry giant would not only be ridiculous, it would be unspeakably negligent. It would open a libellous flank of the governments' and of the company that would, in the end, not only potentially be more costly to the government and company, but ostensibly to the very taxpayers and citizens the government purports to protect and serve.

Iris Jonsson: I was a member of the Concerned Citizens of Swan River in the 1990,s when we worked with the CEC and were responsible for the establishment of RTOs in the LP plant near Swan River.

I am shocked, angry and disappointed that the MB government would change LPs license without consulting the citizens of this area (the stakeholders were notified after the fact) and risk our health and lives to save LP money. We have spent enough money on them by bringing in natural gas.

Yes I agree, people do need jobs but at what and whose expense?

Mr. Coulter, please do something to correct this bad decision!

Jonathan Kornelsen: It is in my understanding that Louisiana Pacific has called for an increase in emission limits by the province. As a citizen of Manitoba, I am emailing to say that these emission limits should not be changed and LP should continue limiting their emissions.

Anne Lindsey: I have concerns regarding the proposal by Louisiana Pacific (LP) to permanently discontinue use of the Regenerative Thermal Oxidizer (RTO) technology, thereby increasing air emissions of a number of highly toxic and carcinogenic volatile organic compounds.

RTO technology seems to have served the purpose for which it was installed in the first place: to control emissions of formaldehyde, benzene, MDI and other VOCs, in response to citizens' appropriate concerns about the health of local residents. The company has been congratulated for its emissions control by the Canadian Centre for Pollution Prevention. This is not the time to reverse those steps, even though it might be economically expedient to do so.

At minimum, this proposal should be subject to a review by the Clean Environment Commission, and by independent experts on the health impacts of the relevant air emissions.

Susanne McCrea: It is unacceptable for the government of Manitoba to allow the Louisiana Pacific' Swan Valley OBS mill to take the RTO pollution controls offline. Those controls were put in place only after significant outcry from the Concerned Citizens of the Valley, the Manitoba Future Forest Alliance and others raised the alarm in the early 90s, when LP wanted to build that mill. They had to hire a lawyer and fight hard to get the Clean Environment Commission hearing in place that recommended the RTOs. These chemicals are equally dangerous today.

I was shocked to learn that the RTOs were offline on even a temporary basis, with the permission of this government.

The company sites economic downturn, which we know to be true, but to compromise human health in favour of the profits of a multinational corporation is not acceptable. Another solution must be found.

Various subsidies have been granted to LP over the years. For OSB, earlier on the company was paying perhaps 60 cents a cubic meter while OSB mills in Alberta were paying perhaps \$10.00 or more. Where LP in Swan were paying perhaps <\$350,000 per year stumpage, for the same kinds of volumes a mill in Alberta might have been paying perhaps \$3.6 million. Numbers very approximate but there have been many millions of dollars granted in subsidy. Three levels of government, including NDP, put out about \$5 million to bring natural gas to the Valley, primarily for LP. I suggest that you look at how many OSB mills are operational now. Swan Valley likely one of the last across the country. So its cost position is pretty good. Worker safety compromised more in this province? No need for press room to be self-contained (e.g., like in the US in at least some mills)?

It is deplorable that we have no national ambient air quality standards in Canada. The responsibility falls on the Province of Manitoba to do the right thing and deny the request from LP to take the RTOs offline. The pollution controls they put in place in 2004 are designed to work with the RTOs, not by themselves. I've been doing some research on this. I suggest you do the same.

Independent review of this situation is required. We cannot accept data and other information from LP, without impartial analysis. Undoubtedly, this will mean funding must be made available for independent review to find another method of addressing these economic issues.

No one wants to see 175 workers laid off in another mill closure. Nor, is it condonable for a multinational who has received such subsidies to harvest our resources to use the threat of such closure to scare workers into keeping quiet about their concerns for the health of their families and community.

Do not allow this application's approval, for the sake of those Manitobans who will suffer if you do.

Leah Moffatt: I strenuously object to the permanent shut down of Louisiana Pacific's RTO pollution control systems.

Economic hardtimes are affecting every one of us in today's society, but this doesn't mean that we should allow any company or person to forgo their social and environmental responsibility.

Allowing any company to stop protecting the health of the forests, streams, creatures and humans in the area it is located in for economic reasons is not only foolish it's ludicrous. Furthermore to protect the profits of an American company over the health and bio-diversity of the region it's located in is ridiculous the profits you are willing to protect leave Canada and do not benefit the region in any way.

Please do not allow this company to shut down its pollution controls in fact immediate steps should be taken to ensure the controls are not only immediately reinstated but that they are reviewed and regularly checked to ensure the company is complying with the strictest standards

Do not allow our province to compromise human health in this way.

David Nickarz: How dare you allow Louisiana-Pacific's mill near Swan River, Manitoba to pollute the air and turn off its pollution control equipment. It's bad enough that they exist and are raping our forests in the first place--and now you want to grant them permanent pollution exemption?

I don't care if that company goes out of business due to the operating costs of the pollution control equipment. If they can't operate the most basic safeguards for our environment and our health then they should shut down that mill.

You literally make me and all other Manitobans sick.

While you're at it, shut down that mill, and the Tembec mill in Pine Falls, and the Tolko mill in the Pas. Give our forests a break from clear cutting. It would be better for carbon sequestration, clean water, clean air and animal habitat.

Cheryl Penner: I will keep this brief, I am writing you to contest Louisiana Pacific Canada Limited's request of January 29, 2009, to alter the Environment Act so as to allow the discontinuing of their use of Regenerative Thermal Oxidizers (RTOs) for the control of Volatile Organic Compound (VOC) emissions and other toxic substances. As people enjoying relatively unpolluted air and water in Manitoba, we cannot take this for granted and allow this to go on in any part of the world. Thanks for taking the time to read this.

Larry Powell: I learned with some surprise and concern about the attempt by Louisiana Pacific to do away with pollution control equipment at its OSB plant in Manitoba.

In this era of mounting global concern about the state of our health and environment, is this really the time to be considering such a move?

I was doubly concerned to learn that your government had, in January, already given the corporation quiet permission to shut such equipment down on a temporary basis.

While I'm not a resident of the immediate area, I am a citizen of this province and have already contributed to the success of the plant in question with my tax dollars through such publicly-funded projects as the natural gas line which services it.

So I feel I have the right to urgently request that you at least hold some sort of public consultation before permanently allowing such a questionable move.

Ericka Reis: I am writing to you to contest Louisiana Pacific Canada Limited's request of January 19, 2009, to alter the Environment Act so as to allow the discontinuing of their use of Regenerative Thermal Oxidizers (RTOs) for the control of Volatile Organic Compound (VOC) emissions and other toxic substances.

We need the government of Manitoba to be transparent on these issues. We are, after all, a democracy. We have the right to know when something will affect our health.

We need to fully investigate the effects of VOC emissions across the Province. To do this we must push for a CEC hearing on the matter. Furthermore, the Government of Manitoba needs to grant intervenor funding to all interested parties, to ensure first and foremost that the public is able to protect its interest.

At minimal we need an immediate revocation of the interim approval unilaterally granted by Minister Stan Struthers (January 8, 2009) to Louisiana Pacific to cease the use of RTO

Thank you very much for your time and I hope that you will take this and other related emails seriously. The consequences are will affect us all if we do not take this matter seriously.

Shaun Rempel: I demand Louisiana Pacific owned Swan Valley OSB mill application to take RTO pollution controls permanently offline be denied.

The mill claims that they need to shut down the controls due to economic hard times. This is a forest industry giant. Profits may be down in this industry, but taking pollution controls offline is not the answer. I am opposed to allow our province to compromise human health in this way.

Margaret Romak: It is with great dismay and disbelief that I am writing this letter to you. For LP to even think that we Canadians should not be given the same protection from toxic chemicals that Americans are, is a sterling example of why multinational corporations ought not to be allowed to set up shop here unless they meet our standards of operations and accountability.

We deserve the same level of health protection that Americans do.

We deserve to have enough time to debate this fully.

We deserve the chance for this to be done publicly.

Anything that our Canadian government does to deny us any of the three things that I have listed here, makes them complicit in the matter.

Dan Soprovich: I am very concerned relative to the Louisiana Pacific Canada Ltd. proposal to eliminate its RTOs and to have an increase in its emission limits. The various reasons for this are indicated below.

On the basis of these reasons, I am asking you to

- (a) immediately revoke interim approval as granted on January 8 of this year,
- (b) ensure that a CEC hearing takes place respecting LP's proposal to permanently eliminate its RTOs, and
- (c) ensure that intervenor funding is available so that the public is able to protect its interest by being able to hire independent expertise.

1. The RTOs (Regenerative Thermal Oxidizers) were originally installed in this OSB plant as the result of a number of very dedicated people concerned about the environment and human health. People like Don Sullivan and other Winnipeg folks, and Ken Sigurdson and others from the Swan Valley.

This was a significant environmental battle in the mid-90's and a huge victory by those working (almost all or all volunteering) on behalf of their fellow man and the environment. At the time,

LP was not proposing to install this kind of technology, nor was the government suggesting that the Company do so.

The Clean Environment Commission conducted hearings on the LP plant, and due to the stellar work of the concerned citizens, the CEC recommended that LP install pollution control equipment (Thermal Oxidizers RTO) to burn off the Volatile Organic Compounds. The glues and resins (MDI-isocyanates and phenol formaldehyde) produced numerous VOCs when heated during pressing of the OSB board. The wafer dryers also produced VOCs. These VOCs are hazardous to human health, and both MDI and Formaldehyde are classified as hazardous substances (even more hazardous when heated and volatilized by the presses). The CEC hearings lasted several weeks and included testimony from the US Environmental Protection Agency (EPA). The EPA had reached a consent agreement with LP to install RTOs at all its US plants.

While our government of the day would have been quite happy to go along without the technology, Don and Ken and all the other folks did not believe that Manitoba should be treated as a third-world branch plant by this American company. They prevailed and LP was required to install the technology.

Given LP's application respecting the Swan Valley plant, it would be worthwhile to investigate whether or not the EPA continues to require LP to use RTOs or similar technology in its United States operations, and the current role of this kind of technology.

2. LP has indicated that VOC emissions from drying operations have been reduced though operational changes, in relation to when the RTOs were originally installed. However, despite the indicated reduction, the Company is applying for "increased emission limits". This naturally makes one wonder about just how real and significant these reductions really are (e.g., perhaps, in whatever data are available, these reductions relate at least in part to the fact that LP has been processing less board in recent times due to reduced demand for its product).

Information from this Company should be treated with significant caution as, for example, LP does not have a trustworthy track record respecting its 1995 Forest Management Plan and Environmental Impact Assessment on the forest. For example,

a. In the 'Environmental Impact Statement' for the Duck Mountain, Louisiana-Pacific's consultants stated that "... the hardwood timber supply contemplated by the FMP is sustainable over the next 100 years ..." (Page 2, letter from TetrES Consultants Inc. Mike McKernan). That 'sustainable over the next 100 years' hardwood timber supply was approximately 71% too high against a new 'sustainable' Annual Allowable Cut calculated during a timber supply analysis by Manitoba Conservation some 8 or 9 years later (Manitoba Forestry Branch. 2004).

b. In its Forest Management Plan for the Duck Mountain, LP assumed that aspen forests and mixed deciduous forests (black poplar and white birch forests, and mixes of the three species) would yield 328 cubic meters per ha at age 60 (Site Index 21, see Pages 7-16 and 7-17 of Louisiana-Pacific Canada Ltd. 1995. Forest Management License #3 Ten-Year Forest Management Plan 1996-2005. Volume 1). Comparison of LP's yield assumptions to those in the Forestry Branch (2004) report demonstrate that Louisiana-Pacific assumed aspen forests to yield

approximately 2.07 times the true yield, and mixed deciduous forests to yield approximately 2.53 times the true yield (Soprovich. 2006. Trembling aspen and hardwood yield assumptions for the Duck Mountain, Manitoba. Environmental Impact Assessment Information Note Number 5).

3. The OSB industry is in a financial mess right now, with many mills across Canada shut down. The great majority of LP's production goes to the USA, where the housing industry is in terrible shape. Per information from the LP Stakeholder Committee, the Company told Committee members that this action would save the Company some \$3 million. It is reasonable to assume that it is highly likely that it is this cost saving that is driving the decision, as opposed to any concern about health (or an interest in reducing greenhouse gases, which is one of the spins being put forward by the Company). In an article in the February 3, 2009 issue of The Swan Valley Star & Times, LP Manager Kevin Betcher is quoted as saying "We will pursue every avenue to improve our cost position while meeting our environmental and social compliance responsibilities." The operational word here is "compliance", meaning exactly what our provincial government will let them get away with.

This very much appears to be a rush to change the operating parameters of the mill in response to economic drivers, as opposed to environmental drivers ... not unlike the apparent recent federal government move to soften environmental assessment to speed up infrastructure projects. Perhaps noteworthy is the fact that Premier Doer has a long-standing position that environmental assessment of large hydro development is too slow.

4. In a report a year or two ago, as referenced in the Winnipeg Free Press, LP was one of the worst industrial polluters by volume in Manitoba (in fourth or fifth place per my recollection). The prime pollutant was volatile organic compounds.

5. In the article in The Swan Valley Star & Times, Mr. Betcher was indicated to note that the Company "had shown that shutting down the RTO has no significant impact on human health and the environment". I wonder how LP could possibly show this given that the RTO technology has been operational (i.e., has not been shut down for any significant length of time ... unless operating in violation of its Environmental License?) ... there is a logical problem with this statement if it is accurately reported. Further to this, I have been told that at least one of the local rumours circulating is that two people have been diagnosed with rare diseases in the area, including at least one where the physician a priori asked if the person had been exposed to some kind of industrial pollutant. Also, a source once told me that when LP initiated its study to look at emissions soon after the plant became operational, Dr. Kay Wotton, a local Health official out of Dauphin at the time, quit the advisory board on the study because it was so poorly designed. It is my view that any information submitted by LP must be scrutinized very carefully by independent people with the appropriate expertise.

Further to Mr. Betcher's statement, those of you with basic science training will recognize that it is a reasonable scientific proposition to demonstrate differences between, for example, groups (i.e., per statistics, low alpha or Type I error), but that it is entirely another proposition to demonstrate no effect. So, for example, looking at BC's RISC standards, the general indication in these standards is that one can demonstrate either presence or not detected given a sample for a given species. Suggesting that one can demonstrate no impact on health is questionable on a

number of fronts, including factors like the amount of time required for chemicals to manifest themselves.

Further to the above, there is a need to determine the meaning of "significant" impacts.

Soon after the mill started up, a person who does soil testing told me that sulphur was no longer required as a micro-nutrient input by farmers in the local area. Obviously because it was coming out of LP's stacks. Clearly, people in the area are also taking in VOCs.

6. In the same article, Mr. Betcher is quoted as follows. "We recently received interim approval to shut down our Regenerative Thermal Oxidizers (RTO) until such time that the government can consult with constituents." and "And we have been working with ministers Rosann Wowchuk and Stan Struthers and Andrew Swan on this and many other cost saving initiatives. We are very pleased that they are supporting us."

My understanding is that this interim approval was granted on January 8 of this year by virtue of a new Environment Act License. I further understand that the Environment Act allows for alteration to an Environment Act License if deemed a 'minor' alteration at the discretion of the Minister (in this case Minister Struthers).

This certainly should raise concerns among any of us concerned about environmental matters in Manitoba. Should the conditions of an Environmental License be changed in a substantive manner, as certainly has occurred here, without the opportunity for prior public examination? And particularly so given the massive public volunteer investment that led to the conditions of this License? What was the purpose of the CEC hearings, public involvement, and recommendations if they are so easily circumvented? What was the role of Ministers Wowchuk, Struthers, and Swan respecting this interim approval? For example, was this a top-down politically-driven decision without the support of the appropriate bureaucracy and information? Certainly, as reported, there appears to be very serious process issues here, to the point of making a mockery of the CEC and licensing processes, and the Environmental License itself.

It is also perhaps noteworthy that the 'Notice of Environmental Act Proposal' advertisements that were placed in the Winnipeg Free Press and Swan Valley Star & Times did not note that interim approval had already been granted by Minister Struthers. This information should have been provided to the public. That would have been honest and transparent.

It is interesting to note that LP made a commitment to the community to install RTOs at the CEC hearing, and that then opposition MLA Wowchuk took some credit for this achievement.

7. In the same article, Mr. Betcher is quoted as saying "In fact, there is no other OSB mill in Canada that operates an RTO to control volatile organic compounds, putting our mill at a significant cost disadvantage."

Two matters are important to note here. I am told that the LP mill at Swan River, at least initially, used glue with chemicals that were not used in at least some other mills. Perhaps those other mills that Mr. Betcher referred to use different glues.

Secondly, it should be noted that LP has received wood from the residents of this province, you and me, at an extremely low cost in comparison to many other provinces. Alberta, for example, charged companies much higher rates than did Manitoba when the market for OSB led to very high prices for OSB mills (and profit margins). I was also told that major components in the LP mill were salvaged from a mill in South America (cost implications). Furthermore, when the Swan Valley mill was built, unlike at least some of the mills in the US, the pressroom was not self-contained (i.e., to contain the movement of contaminants within the mill). So there are many other areas where the Swan Valley mill has been, or is, at a significant cost advantage. Given that many or most OSB mills are shut down across Canada, I would argue that their cost position is likely to be among the best in Canada.

8. Some 8 years or so ago, natural gas came to Swan River, primarily as an aid to LP because this would be cheaper than the propane that the Company was using to power its RTOs. My recollection is that LP were to use about 88% of the gas initially, per figures provided to the Public Utilities Board. My recollection is that LP put in a bit of money, I think \$300,000 or something. The feds were in for about \$1.7 million, the province for \$1.7 million, and local ratepayers for about \$1.7 million. At the time, my calculation was that the three local ratepayers who were not on gas would subsidize the one ratepayer who signed up to the tune of about \$1000 each, or \$3000. Some absurd estimate of ultimate signup by local ratepayers was presented to the Board, perhaps 8 of 10; it never happened.

Bottom line on this issue, if the province allows LP to shut down its RTOs (justifiably or otherwise), this will represent an approximate \$5 million subsidy to LP that will be mostly lost. This subsidy occurred under the present NDP government. If the RTOs are shut down, perhaps LP should be made to pay back the subsidy, or the great majority of it.

As indicated above, there are a number of reasons why this application by LP should receive significant scrutiny. Of particular concern are (1) this is almost certainly cost-driven as opposed to environmentally-driven or human health-driven (2) there are significant questions respecting process, including how it can be that an Environmental License can be significantly altered by a Minister without public consultation (and especially when these conditions came to be due to the involvement of the public) and (3) the Company lacks credibility respecting long-term forest management and therefore should receive very close public scrutiny.

Jenny Sandilands: I am writing this on behalf of myself and my family, we are concerned about LP increasing its emissions. I have just heard about what is going on and am not fully understanding what will be happening. I have heard that the emissions can cause birth defects and living about 1 mile away how will that affect the children that I plan to have? How do I know that those emissions aren't the cause of what happened with my first child? What are they doing to me and my husband? I would appreciate a meeting then I would be able to fully understand what is happening and what will happen.

Kenneth Sigurdson: On behalf of the Concerned Citizens of the Valley we would like to state our objections to the removal of the RTO (Regenerative Thermal Oxidizers) at the Louisiana Pacific Plant in Minitonas, Manitoba. The Concerned Citizens of the Valley is a group of local residents

that formed to point out the environmental impacts of industrial forestry and the Louisiana Pacific operation.

We oppose the removal of the RTOs for the following reasons:

1. RTOs a CEC recommendation to control pollution

The Clean Environment Commission conducted extensive hearings on the LP plant. It was a CEC recommendation that LP install pollution control equipment (Thermal Oxidizers RTO) to burn off the (VOCs) Volatile Organic Compounds. The CEC hearings lasted several weeks and included testimony from the US Environmental Protection Agency (EPA). The EPA had reached a consent agreement with LP to install RTOs at all of its US plants. Louisiana Pacific had received the largest fine ever levied by the EPA under the US Clean Air Act

2. VOCs from OSB plants are a hazard to human health

The VOCs emitted are numerous and include noxious emissions such as benzene, toluene, and hydrogen cyanide. The glues and resins (MDI-isocyanides, and phenol formaldehyde) when heated in pressing OSB board produce numerous VOCs. The wafer dryers also produce hazardous VOCs. These VOCs are a hazardous to human health and both MDI and Formaldehyde are classified as hazardous substances (even more hazardous when heated and volatilized by the presses).

3. The company's commitment to the residents of the Swan River Valley.

At the CEC hearing process in the summer of 1993 the company Louisiana Pacific made a commitment to install RTOs at the Minitonas LP plant. The LP web site brags about the use of RTOs, at the Swan River plant. The site has a picture of LP's Derek Boychuk and the caption states, "To most of us, that's an RTO towering over Environmental Lead-Hand Derek Boychuk at LP's Swan Valley mill. But Derek has a different name for the mill's Regenerative Thermal Oxidizers. "They're kind of my babies," he said. RTOs burn volatile organic chemicals, an important part of the mill's air quality system." Boychuk further states "Usually, the only time they shut down is if I shut them down," he says with pride."

4. RTOs are recognized as the best available control of VOCs.

The US Environmental Protection Agency requires ALL oriented strand board plants to install Thermal Oxidizers in ALL United States OSB plants. It should also be noted that the Suncor ethanol plant in Sarnie, Ontario has RTOs to burn off the noxious gases from this operation.

**Conclusion:** RTOs are required to remove VOCs and protect the health of the citizens, LP web site states "they burn off volatile organic chemicals and are important to air quality." The CEC process of 1993 and subsequent recommendations should not be disregarded. The license and requirements of that license need to be enforced not circumvented.

Kenneth Sigurdson – Follow up submission: On behalf of the Concerned Citizens of the Valley please add to our March 3, 2009 presentation the entire transcript of the Clean Environment Commission Hearings on Louisiana Pacific held in Swan River in the summer of 1994. Please also review the recommendations of those same CEC hearings. I do not have the transcripts but I am requesting that you include this in any review.

There is no need to reinvent the wheel here again. The company and the CEC and the government all made a commitment to RTO's in 1994. Nothing has changed only LP's desire to off load pollution onto the community. The reasons for control of VOCs are all documented in the transcripts and the recommendations of the Clean Environment Commission. The United States requires RTO's at OSB plants to control VOCs, this has not changed either. We will not allow LP to treat us as third world country in the Swan River Valley.

Ben Stewart: I'd like the government to make it a requirement that the environmental controls at Louisiana Pacific's strandboard plant be in use in our Province.

RM of Swan River: The Council of the R.M. of Swan River do not have a submission at this time. But their request is that a Public Hearing be held in the Swan Valley area so that the concerns of the public could be heard.

Council is hopeful that a Public Hearing will be held, and look forward to your favourable reply.

David Sweatman: Hi, my name's Dave and I am a recovering human being.

I guess it may cost you your job or reputation to get in the way of this one, better to step aside and let 'nature take it's course'. That's funny in a way.

Why do humans find it so difficult to be good to the natural world??

It's baffling really, considering the current state of the environment, to think that there's yet more pollution to come, that we're not done yet! The very natural world that without, what would human beings exploit?

It doesn't take a ph. D. to see it around us, the constant trashing of nature.

For profit. (I make \$300 a month by the way and survive. when a job comes around that I morally feel is ok to work, I work it. I'm not proud. can those in power say the same?)

I ride my bike everyday, that's how I get around. How nice it would be to be able to ride without fear of being killed by a car and driver, without having to breathe in toxic fumes, without feeling like an outcast.

I would like to voice my opinion on volatile organic compounds, and their release into the 'environment' by Louisiana Pacific. My opinion is that the physical and spiritual world is, well, there's no difference. Therefore, we should consider taking care of the physical world, or suffer the spiritual consequences. And we all suffer them. Especially those that are aware enough to know there is a spiritual world. This one.

Why we don't take care of the survival of life itself, is beyond me. All we seem interested

in is 'our' (not mine) profits.

if this company gets away with dumping toxic materials into nature, and is permitted to do so by Stan Struthers and yourself, who are representing the public (why are we making counterproductive changes to the Environmental Act anyway) I sincerely wish upon the government of Manitoba and Louisiana Pacific, a lightning bolt from the sky, directly to the hearts of those responsible, so that they never commit another crime against nature again.

I have a hard time living in MB with a government that doesn't care about the things I care about, maybe one day it will no longer be profitable to commit these heinous acts of violence towards nature.

Johanna Teichrieb: Please do not release any VOCs or other toxins into our atmosphere!!! We do not want this ridiculous pollution to take place in our environment! Please think about it and be considerate. If more people knew about this, they wouldn't stand for it either. Thank you for your time.

Adrina Turenne: I am a deeply concerned Manitoban regarding the Louisiana Pacific owned Swan Valley OSB mill application to take RTO pollution controls permanently offline. Please deny this application.

Our natural resources are some of the best in the world.  
As minister of conservation, I'm sure you understand how valuable our natural heritage is.

We need to protect our land, not destroy it.  
Please help us in doing so. We are counting on you.

Cathie Turner: I contest Louisiana Pacific Canada Limited's request of January 29, 2009, to alter the Environment Act so as to allow the discontinuing of their use of Regenerative Thermal Oxidizers (RTOs) for the control of Volatile Organic Compound (VOC) emissions and other toxic substances.  
Remember - we are trying to get rid of toxins in our environment - not increase them!!!!

Lynwood Walker: As a resident of Western Manitoba, I must state that I am categorically and unequivocally opposed to the Commission granting Louisiana Pacific (LP) permission to shut down any portion of the pollution controls currently in place in its Swan Valley OSB plant in Swan River, MB.

My basic reasoning is simple – it is a violation of LP's own policies, its own vision, and the fundamental principles by which it has claimed to be a good corporate citizen for these last many years. LP has publicly proclaimed itself to hold certain values and standards and ethical principles paramount. Yet when faced with its first real challenge, it would seek to abandon almost every principle but one: preserve the shareholder value.

Let us begin by looking at LP's own "Corporate Policy on the Protection of the Environment" as approved by Rick Frost (CEO) and the LP Board of Directors on May 4, 2002:

“Louisiana Pacific Corporations strives to:

- Meet or surpass the requirements of environmental laws and regulations and to improve the environment.
- Manage natural resources in a responsible and sustainable manner.
- Be environmentally conscious stewards of the land.
- Meet, as verified by third-party audits, the principles recommended to foster multiple-use and the sustainability of world forest resources.
- Conserve non-renewable resources through efficient use and careful planning.
- Properly manage and minimize waste through pollution prevention programs.
- Fully account for environmental considerations in corporate planning, policies and decision-making.
- Continuously improve environmental programs.”

\*Quoted in the LP Wilmington Sustainability Report on Local Operations 2005.

How can anyone possibly say that the LP application to shut down pollution controls in Swan River complies with its own stated policies? How does shutting down pollution control “properly manage and minimize waste” or “improve the environment”? How does this application “continuously improve environmental programs”? Or “fully account for environmental considerations in Corporate Planning”? The answer, of course, is that it does not, in any way, shape or form conform to the stated environmental policies of LP as declared by its own Board.

Let us jump ahead a few years to 2006. Times are getting tougher in the OSB business. In his letter to readers of LP’s 2006 Interim Sustainability Report, Rick Frost (still the CEO) says in part:

“The achievements outlined in this report stem from LP’s stewardship values and the commitment of our employees to put those values to work every day. Whether it’s our mandate to use sustainably harvested timber in our products, our environmentally responsible corporate policies, our pursuit of the safest work environment possible or our many community outreach programs, I believe you’ll see how these 2006 accomplishments resonate with LP’s values and vision.”

A few paragraphs later, Mr. Frost concludes:

“Our vision remains simple. It’s stated in just a few words, yet reminds us daily of who we are, what we do and why we do it. All of us at LP look to this vision to steer us toward being a better company and to improve our stewardship of our resources, our people and our communities.”

Just what is that vision that Mr. Frost is so gallantly proclaiming? According to that self-same document, LP’s Vision is that:

“LP will be a respected, profitable and growing manufacturer of building products...”

That is the supplier of choice because of our quality products and reliable services,  
and...

The employer of choice because we are a safe, ethical, fun, challenging and rewarding  
place to work.”

On page 6 of that same 2006 Interim Sustainability Report, it states:

“Responsibility for protecting the environment is built into the job of every LP  
manufacturing employee. LP has built an exceptional environmental management system  
(EMS), unique in our industry, implemented by one hundred percent of all operating  
North American manufacturing sites. LP’s EMS taps into the know-how of LP’s  
employees, who take personal responsibility for their actions. Employees work in teams  
to develop and continuously improve procedures that meet and often surpass  
environmental compliance requirements.

Each LP facility fits its situation into the EMS customizing elements as needed for its  
unique situation and requirements. As a result, LP has experienced an 80 percent  
reduction in environmental citations since 1996. In fact, about half of our facilities have  
had zero environmental notices of violation in more than five years.

EMS is more than just a program to guide LP employees toward regulatory compliance.  
It also provides opportunities to become leaders in environmental stewardship. LP sites continue  
to be recognized for their environmental leadership.”

It would appear from this application that LP has elected to emphasize the word  
“profitable” to the utter abandonment of “respected”, “safe” and “ethical” – qualities that  
I believe we as Manitobans hold equally dear. Where in this application is LP’s self-stated  
sense of “environmental leadership”? Where is their commitment to “Stewardship of resources,  
people, and communities”? Is their new idea of an “Environmental Management System”  
to simply turn off anything that manages their impact on the environment?

I am not totally unfeeling to the plight of LP or the many jobs at stake in Swan River.  
I realize that LP has gone through some major debt re-structuring, plant closures, and  
other measures just to stay afloat in these turbulent times. While the numbers sound  
huge, I do not believe that they are a significant portion of the costs of running the  
Swan Valley OSB plant. In fact I believe that much of this is just a ploy.. asking the  
government for what it will not give so that they will look more favourably upon the  
next request (which may be almost as bad).

I believe that is MB Conservation’s responsibility to help LP stay true to its stated  
environmental commitments while at the same time helping it preserve or improve the  
economic viability of the Swan River plant.

To that end, I would offer a few alternatives for MB Conservation and LP to consider  
(in no particular order):

- If the current pollution control devices are nearing the end of their useful life, perhaps it is an opportune time to provide some sort of regulatory incentive to research and adopt newer, better, and more efficient pollution control and waste recovery technology.
- Are there fundamental changes needed to the process of producing OSB that would result in more efficient plant operation, higher yields, and lower production of toxic byproducts? Again, can regulatory incentives be applied to encourage R&D in these areas?
- If it is no longer feasible to operate the mill for production of OSB, are there other less toxic products that can be produced at that facility?

I do not pretend to have the answers to these questions – but I wholeheartedly believe that they are worth asking. While they are being asked and debated, however, I believe that the responsibility of MB Conservation (especially the Licensing Branch) is to ensure that the environmental protection commitments made by LP are not allowed to become pawns in the corporate game of increasing profit and shareholder value. Neither should the MB government get into the business of subsidizing or underwriting some portion of the costs of an environmental systems overhaul.

To allow such an action, even in the short term, is to set a dangerous precedent and risk turning back the environmental clock to that era where corporate greed ruled – and clouds of smoke and noxious chemicals filled our skies and our water because the pursuit of profit made it expedient to do so. The time has come to stand our ground as a community of people concerned for the greater long-term good of all – and to declare that our values include clean air and clean water and that is the responsibility of all industries large and small to support those values in their daily corporate and personal decision-making.

May you choose wisely.

Stephen Weedon: Manitobans need to fully investigate the effects of VOC emissions across the Province. At the very least, Manitoba needs an immediate halt of the interim approval unilaterally granted by Minister Stan Struthers (January 8, 2009) to Louisiana Pacific to cease the use of RTO. Even in times of recession, the environment and public health should continue to be priority over narrow economic interests.

Glenda Whiteman: On behalf of the rapidly increasing population of chemically sensitive individuals in Manitoba (of which I am one), I am submitting this STRENUOUS OBJECTION to this current and any future efforts by industry to reduce de-pollution initiatives. It's nice to read that VOC emissions have been reduced. Until you can tell us that they have been eliminated, I look forward to your response that you will NOT consider any requests to decommission RTOs and increase toxic emissions.