

Environment Act Licence Loi sur l'environnement Licence

Manitoba
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Licence No./Licence n° 2561

Issue Date/Date de délivrance October 15, 2003

**IN ACCORDANCE WITH THE MANITOBA ENVIRONMENT ACT (C.C.S.M. c. E125)
THIS LICENCE IS ISSUED PURSUANT TO SECTION 10(1) TO:**

MOTOR COACH INDUSTRIES LIMITED; "the Licencee"

for the operation of the Development being a coach and coach shell manufacturing facility, located as described in Attachment 'A' to this Licence, in the City of Winnipeg, in accordance with the Proposal filed May 27, 2002, and subsequent information filed December 24, 2002, subject to the following specifications, limits, terms and conditions:

DEFINITIONS

In this Licence,

"**accredited laboratory**" means facilities accredited by the Standard Council of Canada (SCC), or facilities accredited by another accrediting agency recognized by Manitoba Conservation to be equivalent to the SCC, or facilities which can demonstrate to Manitoba Conservation, upon request, that quality assurance/quality control (QA/QC) procedures are in place equivalent to accreditation based on the Canadian Standard Can/CSA-Z753, extension of the international standard ISO 9000, Guide 25;

"**affected area**" means a geographical area, excluding the property of the Development;

"**approved**" means approved by the Director in writing;

"**as-constructed drawings**" means engineering drawings complete with all dimensions which indicate all features of the Development as it has actually been built;

"**coach shell unit** " means each coach which is manufactured at and shipped from the Development without the application of finish coating;

"**coach unit** " means each coach manufactured at the Development to completion including all coating operations and mechanical components;

****A COPY OF THE LICENCE MUST BE KEPT ON SITE AT THE DEVELOPMENT AT ALL TIMES****

"coating materials" means rust inhibitors, undercoatings, primers, base coats, top coats, clear coats or other materials containing VOCs or PAHs and used to put a protective, decorative or coloured finish on coaches;

"dangerous good" means any product, substance or organism designated in the regulations, or conforming with the criteria set out in the regulations, or in any regulation adopted in accordance with The Dangerous Goods Handling and Transportation Act, and includes hazardous wastes;

"Director" means an employee so designated pursuant to The Environment Act;

"Environment Officer" means an employee so designated pursuant to The Environment Act;

"manufacturing facility" means those buildings at the Development where coaches and coach shells are fabricated, assembled and finished;

"noise nuisance" means a continuous or repeated noise in an affected area, which is offensive, obnoxious, troublesome, annoying, unpleasant or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or
- c) present at a location in an affected area which is normally open to the members of the public;

if the noise

- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director, and within a 90 day period, from 5 different persons falling within clauses a), b), or c), who do not live in the same household;

"odour nuisance" means a continuous or repeated odour, smell or aroma, in an affected area, which is offensive, obnoxious, troublesome, annoying, unpleasant, or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or
- c) present at a location in an affected area which is normally open to the members of the public;

if the odour, smell or aroma

- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director, and within a 90 day period, from 5 different persons falling within clauses a), b), or c), who do not live in the same household;

"opacity" means the degree to which emissions reduce the transmission of light and obscure the view of an object in the background;

"PAH" means polycyclic aromatic hydrocarbons containing several fused (joined) rings of aromatic molecules made up only of carbon and hydrogen, and including but not limited to compounds such as:

- | | |
|-------------------------|-----------------------------|
| a) Benzo(a)anthracene | i) Dibenzo(a,j)acridine |
| b) Benzo(a)phenanthrene | j) Dibenzo(a,h)anthracene |
| c) Benzo(a)pyrene | k) Dibenzo(a,i)pyrene |
| d) Benzo(b)fluoranthene | l) 7H-Dibenzo(c,g)carbazole |
| e) Benzo(e)pyrene | m) Perylene |
| f) Benzo(g,h,i)perylene | n) Fluoranthene |
| g) Benzo(b)fluoranthene | o) Phenanthrene |
| h) Benzo(k)fluoranthene | p) Pyrene |

"particulate matter" means any finely divided liquid or solid matter other than water droplets;

"particulate residue" means that part or portion of an atmospheric emission which is deposited onto a surface;

"PM₁₀" means particulate matter with a mean aerodynamic diameter equal to or less than 10 micrometres (μm);

"PM_{2.5}" means particulate matter with a mean aerodynamic diameter equal to or less than 2.5 micrometres (μm);

"point source" means any point of emission from the Development where pollutants are emitted to the atmosphere by means of a stack;

"QA/QC" means quality assurance/quality control;

"significant" means of important negative consequence as determined by an individual with demonstrated expertise who is qualified to make such judgements;

"stack" means a duct, pipe, chimney, vent, or similar opening through which pollutants are emitted to the atmosphere;

"Standard Methods for the Examination of Water and Wastewater" means the most recent edition of Standard Methods for the Examination of Water and Wastewater published jointly by the American Public Health Association, the American Waterworks Association and the Water Environment Federation;

"VOC" means volatile organic compound; and

"volatile organic compound" means any organic substance, mixture of organic substances, or the organic components of any mixture of organic and inorganic substances which may evaporate and become airborne during storage, handling or use. Methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides and carbonates, and ammonium carbonate are exempt from this definition as well as other substances so designated by the Director. For surface coating formulations, volatile

organic compound also means, excluding the previously identified substances, any coalescing or other agent which is an organic substance and evaporates from the coating during the application and drying phase.

GENERAL TERMS AND CONDITIONS

This Section of the Licence contains requirements intended to provide guidance to the Licencee in implementing practices to ensure that the environment is maintained in such a manner as to sustain a high quality of life, including social and economic development, recreation and leisure for present and future Manitobans.

1. The Licencee shall implement a high standard of equipment maintenance and good housekeeping and operational practices with respect to the Development, at all times.
2. The Licencee shall reduce the production and dissemination of wastes by initiating and maintaining waste reduction and waste recycling programs.
3. The Licencee shall, upon the request of the Director and in addition to any of the limits, terms or conditions specified in this Licence:
 - a) sample, monitor, analyze and/or investigate specific areas of concern regarding any segment, component or aspect of pollutant storage, containment, treatment, handling, disposal or emission systems, for such pollutants or ambient quality, aquatic toxicity, leachate characteristics and discharge or emission rates, for such duration and at such frequencies as may be specified;
 - b) determine the environmental impact associated with the release of any pollutants from the said Development; or
 - c) provide the Director, within such time as may be specified, with such reports, drawings, specifications, analytical data, descriptions of sampling and analytical procedures being used, bioassay data, flow rate measurements and such other information as may from time to time be requested.
4. The Licencee shall, unless otherwise specified in this Licence:
 - a) carry out all preservations and analyses on liquid samples in accordance with the methods prescribed in the most current edition of Standard Methods for the Examination of Water and Wastewater or in accordance with equivalent preservation and analytical methodologies approved by the Director;
 - b) carry out all sampling of, and preservation and analyses on, soil and air samples in accordance with methodologies approved by the Director;
 - c) ensure that all analytical determinations are undertaken by an accredited laboratory; and
 - d) report the results to the Director within 60 days of the samples being taken.
5. The Licencee shall carry out any remedial measures, modifications, or alterations, as deemed necessary by the Director, in respect to matters authorized under this Licence.
6. The Licencee shall provide to the Director, upon request, all information required under this Licence, in writing and in such form and content (including number of copies), as may be specified by the Director.

7. The Licencee shall designate an Environmental Manager within 60 days of the issuance of this Licence, who shall have the responsibility to seek compliance with all the limits, terms and conditions in this Licence, and to assist the Senior Management of Motor Coach Industries Limited to manage environmental issues at the Development. The name of the Environmental Manager shall be submitted in writing to the Director within 14 days of designation.

LIMITS, TERMS AND CONDITIONS

Respecting Site Plans and Building Plans

8. The Licencee, within 60 days of the issuance of this Licence, shall submit to the Director:
 - a) engineered and scaled as-constructed drawings of the site of the completed Development sealed by a professional engineer registered with the Association of Professional Engineers and Geoscientists of the Province of Manitoba, showing and identifying by means of a legend: property boundaries, all existing buildings, roadways, storage areas, parking areas, sewer drains, off-site surface drainage discharge locations and other man made structures;
 - b) engineered and scaled as-constructed drawings of the new and altered plant layout described in the Proposal filed May 27, 2003, sealed by a professional engineer registered with the Association of Professional Engineers and Geoscientists of the Province of Manitoba, showing and identifying by means of a legend: all work stations and process areas, all equipment, all ductwork and all air emission control systems; and
 - c) upon written request by the Director, engineered and scaled as-constructed drawings of the plant layout existing prior to May 27, 2003, sealed by a professional engineer registered with the Association of Professional Engineers and Geoscientists of the Province of Manitoba, showing and identifying by means of a legend: all work stations and process areas, all equipment, all ductwork and all air emission control systems.

All drawings shall be of sufficient size, but no smaller than 11" by 17", so as to clearly identify all features including textual descriptions.

Respecting Air Emissions – Limits

9. The Licencee shall not emit from the Development:
 - a) particulate matter in any air emission that:
 - i) exceeds 0.23 grams per dry standard cubic metre calculated at 25 degrees Celsius and 760 millimetres of mercury, corrected to 12 percent carbon dioxide for processes involving combustion, from any point source of the Development;

- ii) exhibits a visible plume with an opacity of greater than 5 percent at any point beyond the property line of the Development; or
 - iii) results in the deposition of visible particulate residue at any time beyond the property line of the Development; or
 - b) particulate matter from any point source with an opacity that equals or exceeds:
 - i) 20 percent as the average of any 24 consecutive opacity observations taken at 15 second intervals;
 - ii) 20 percent for more than 16 individual opacity observations within any 1 hour period; or
 - iii) 40 percent for any individual opacity observation.
- 10. The Licencee shall not cause or permit a noise nuisance to be created as a result of the construction, operation, or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate a noise nuisance.
- 11. The Licencee shall not cause or permit an odour nuisance to be created as a result of the construction, operation, or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate an odour nuisance.

Respecting Air Pollution Control Equipment

- 12. The Licencee shall direct any air emission at the Development, identified in writing by the Director and which contains pollutants of concern to the Director, which if not reduced or altered would, in the opinion of the Director, result in a significant impact beyond the property boundaries of the Development, to a pollution control device which has been designed for and demonstrated to be capable of reducing, altering, or otherwise abating the pollutants, to the satisfaction of the Director.
- 13. The Licencee, within 60 days of the issuance of this Licence, shall submit for the approval of the Director:
 - a) an itemized list of all existing and, when applicable, future air pollution control devices at the Development, identifying for each device:
 - i) the process(es) and/or area served;
 - ii) the pollutants to be abated; and
 - iii) on a plan, the location of the discharge stack(s);
 - b) a standard operating procedural manual and a maintenance procedure and timetable for each air emission pollution control device including cyclones, baghouses, fabric filters, paint booth filters, etc., based on the manufacturers specifications; and
 - c) a copy of the manufacturers operational and maintenance manual.
- 14. The Licencee, upon receiving the Directors approval as required in Clause 13 of this Licence, shall not operate any process directing an emission to an air pollution control device at the Development unless:
 - a) the operating and maintenance measures and status of the device are in full compliance with the approved procedures and timetables;

- b) all emissions from the process served by an air pollution control device are directed to the fully operational device;
 - c) all discharges of treated emissions from the air pollution control devices are immediately directed to a stack; and
 - d) the emissions do not contain concentrations of pollutants which:
 - i) are in violation of any other applicable legal instrument including an Act, Regulation or by-law; or
 - ii) otherwise create a significant health or environmental impact beyond the boundaries of the Development.
15. The Licencee shall maintain a log book of the most recent 24 month period to record any downtime of an air pollution control device due to either the breakdown or maintenance of that air pollution control device. The log book shall be kept at the Development and shall be available upon request for inspection by an Environment Officer. The log book shall record, at minimum, the following information:
- a) identification of the unit and the process(s) it serves;
 - b) time/date of log entry;
 - c) nature of event;
 - d) duration of event;
 - e) the accumulated downtime of this equipment for the events for each calendar year; and
 - f) signature of the environmental manager.
16. The Licencee, in the event of any occurrence of breakdown or other non-scheduled stoppage of any air pollution control device, bypass of any emission required to be directed to such device, or process upset resulting in a situation where an air pollution control device is not able to satisfactorily remove contaminants from the process air received, shall notify the Director:
- a) immediately by phone, facsimile or electronic mail of the event; and
 - b) by submission of a written report within 5 working days of the event:
 - i) explaining and detailing the process upset event;
 - ii) identifying the air pollution control device serving the process;
 - iii) stating the time/date of the event;
 - iv) stating the duration of the event; and
 - v) detailing the nature of all remedial and proposed future abatement actions regarding the event.
17. The Licencee shall handle, store and dispose of all pollutants collected by the air pollution control equipment in a manner suitable to their characterization as type of waste or dangerous good.

Respecting Air Emissions – Sampling, Analysis, Reporting

18. The Licencee, upon written request from the Director, shall provide a stack or stacks including all necessary sampling facilities for the sampling of air emissions at the Development. The stack or stacks shall be provided:

- a) at a location(s) and within a time frame satisfactory to the Director; and
 - b) to the specifications and in accordance with the most recent version of Manitoba Conservation Guideline, *Guideline for Stack Sampling Facilities*, unless otherwise approved by the Director.
19. The Licencee, upon a written request from the Director, shall submit a detailed plan which is acceptable to and approved by the Director, for the sampling and analysis of potential air pollutants, released as stationary point and fugitive emissions, including any compounds determined by the Director. The plan shall identify the rationale for the sampling, the ways and means by which the sampling program will be implemented including any special measures or methods which would be necessitated by influencing factors such as unfavourable weather conditions, the need for large or additional sample volumes, the need for multiple sampling runs, the methods used for the sampling and the analysis for each compound, the detection level to be attained, a comprehensive QA/QC program, and other items as may be identified by the Director.
 20. The Licencee shall perform all stack sampling in accordance with the most recent version of Manitoba Conservation Report No. 96-07, *Interim Stack Sampling Performance Protocol*, unless otherwise approved by the Director.
 21. The Licencee shall arrange the scheduling of the sampling program, submitted and approved pursuant to Clause 19 of this Licence, such that a representative of Manitoba Conservation is available to monitor and audit the implementation of the sampling program.
 22. The Licencee, within a timeframe to be determined by the Director, shall complete the sampling of emissions according to the approved plan submitted pursuant to Clause 19 of this Licence.
 23. The Licencee, within 60 days of the receipt of the analytical results of the sampling plan pursuant to Clause 19 of this Licence, shall submit a report for the approval of the Director containing at minimum:
 - a) the raw data collected;
 - b) a discussion of the sampling and analytical portions of the program including any anomalies of sampling and analysis; and
 - c) a discussion of the significance of the data gathered with specific attention to:
 - i) the significance for potential acute and chronic impacts to health or environment from exposure to concentrations of the compounds detected;
 - ii) the need for risk assessment of the impact of emissions;
 - iii) the need for the establishment of ambient air monitoring stations;
 - iv) the need for dispersion modeling of emissions;
 - v) results and conclusions of the QA/QC program; and
 - vi) other issues as may be determined by the Director.
 24. The Licencee, upon the written request of and in a timeframe stipulated by the Director, shall comply with any air emission or ambient air quality criteria specified by the Director for any pollutant of concern to the Director which has been identified pursuant to Clauses 3, 19, 23, 25, 26 or 27 of this Licence.

Respecting Chromium and Hexavalent Chromium Emissions to the Environment

25. The Licencee, within 120 days of the issuance of this Licence, shall submit a report on the study of chromium and hexavalent chromium use, generation and release from the Development, for the approval of the Director. This report shall consider:
- a) materials used at the Development which contain chromium or hexavalent chromium and are used in processes which could release chromium or hexavalent chromium;
 - b) the mass of chromium or hexavalent chromium per unit mass of each material;
 - c) all processes at the Development which have a potential to generate or release chromium or hexavalent chromium beyond the property boundaries of the Development, and the specific materials of concern used in the process(es);
 - d) an assessment of demonstrable significant health and environmental impacts beyond the property boundaries of the Development;
 - e) an assessment of abatement measures which could be implemented if needed; and
 - f) a timeframe for implementation of abatement measures.

Respecting VOC Abatement

26. The Licencee, within 180 days of the issuance of this Licence, shall submit a plan, for the approval of the Director, identifying ways and means by which emissions of those VOCs listed in Attachment 'B' to this Licence may be reduced from the Development. The plan shall be prepared by a professional engineer registered with the Association of Professional Engineers and Geoscientists of the Province of Manitoba, or other qualified person acceptable to the Director, who is knowledgeable and experienced in the field of VOC abatement. The plan shall be developed and presented in such a manner that any one or combination of actions or measures may be implemented at the written request of the Director. The plan shall:
- a) identify all processes emitting VOCs;
 - b) describe the physical characteristics of the emission pathway i.e. ducting, flow characteristics, etc.;
 - c) identify the specific compounds emitted and their mass and percentage of the total usage;
 - d) identify and discuss effective and feasible operational and equipment modifications to reduce the VOC air emissions and the resulting estimated amount of reduction;
 - e) identify and discuss the implementation of effective and feasible pollutant control equipment to remove the VOCs from the air emissions and the resulting estimated amount of reduction; and
 - f) identify a timeline for the implementation of any or all actions and measures of the plan, should such implementation be requested in writing by the Director.

Respecting Ambient Air Quality Monitoring

27. The Licencee, upon the written request of the Director, shall submit a proposal, for the approval of the Director, to:

- a) sample, analyse and report ambient air concentrations of metals (including zinc, aluminum, manganese, cobalt, nickel and hexavalent chromium), particulates (TSP, PM₁₀, PM_{2.5}), and those VOCs listed in Attachment 'B' to this Licence, at a selected location(s) beyond the property boundaries of the Development; and
- b) locate, install and operate a meteorological monitoring station.

The proposal shall be prepared by a professional engineer registered with the Association of Professional Engineers and Geoscientists of the Province of Manitoba, or other qualified person acceptable to the Director, who is knowledgeable and experienced in the field of ambient air monitoring.

28. The Licencee, upon the written request of the Director, shall implement the approved plan submitted pursuant to Clause 27 of this Licence, within a time frame to be determined by the Director.

Respecting Record Keeping

29. The Licencee shall on an annual basis, record the following information:
 - a) the number of coach shell units manufactured;
 - b) the number of coach units manufactured;
 - c) the number of calendar days operating; and
 - d) the mass balance for those compounds listed in Attachment 'B' to this Licence on the form in Attachments 'C', 'D', and 'E' to this Licence.
 - e) the mass balance for VOCs not listed in Attachment 'B' to this Licence on the form in Attachment 'F' to this Licence.
30. The Licencee, on or before July 31 of each year, shall submit to the Director a report of the information recorded in Clause 29 of this Licence.

Respecting Chemical Storage and Spill Containment

31. The Licencee shall comply with all the applicable requirements of:
 - a) Manitoba Regulation 188/2001, or any future amendment thereof, respecting the *Storage and Handling of Petroleum Products and Allied Products*;
 - b) The Dangerous Goods Handling and Transportation Act, and regulations issued thereunder, respecting the handling, transport, storage and disposal of any dangerous goods brought onto or generated at the Development; and
 - c) the Office of the Fire Commissioner – Province of Manitoba.
32. The Licencee shall provide containment for all vessels containing chemicals and in each area of the development where chemicals are stored, loaded, transferred, used or otherwise handled, in compliance with the National Fire Code of Canada (1995), or any future amendment thereof, such that any product leakage or spillage and any contaminated liquid generated is contained within the Development and contamination of groundwater is prevented.
33. The Licencee shall in a manner approved by the Director, remove and dispose of all spilled dangerous goods.

Respecting Solid Waste

34. The Licencee shall dispose of all solid waste generated from any activity at the Development, which is not recycled, only to a waste disposal ground operating under the authority of a permit issued pursuant to Manitoba Regulation 150/91 or any future amendment thereof, or a Licence issued pursuant to The Environment Act.

Respecting Financial Assurance

35. The Licencee, within 90 days of the issuance of this Licence, shall establish an interest bearing bank account jointly with the Manitoba Department of Conservation in the amount of \$100,000 Cdn. This bank account shall remain in place for the duration of the operation and decommissioning of the facility. Such Account is established to provide funds to either the Licencee or the Director to pay for the direct costs of remediating damage to the environment caused by the discharge or release of hazardous materials in excess of levels allowed by law which are directly caused by the operation of the facility and which are required by law to be remediated. Withdrawal of funds shall require signatures of both the Licencee and Manitoba Conservation. The Director may only utilize funds for reimbursement of the costs or expenses incurred by Manitoba Conservation in remediating the environmental damage described above, and then only in the event that the Licencee is required by law, but does not act, to remediate such damage.
36. The Licencee shall, within 90 days of the issuance of this Licence, provide to the Director evidence of Environmental Liability insurance providing coverage subject to a limit of \$1,000,000 Cdn per occurrence or claim, including coverage for gradual, and sudden and accidental pollution. Coverage to include only off-site clean up costs, and be placed with insurers satisfactory to the Province of Manitoba. The Province of Manitoba is to be added as an Additional Insured on the policy, but only to the extent that such policy will pay for the Province of Manitoba's legal expenses incurred as a result of a third party claim against the Province arising out of a covered occurrence under the insurance policy. The policy shall contain a clause stating that the Insurer will give Manitoba 30 days prior written notice in case of a reduction in coverage or policy cancellation.

Respecting Decommissioning

37. The Licencee shall at such future time as the Development is contemplated to be decommissioned and permanently closed:
- a) submit a Closure Plan to the Director, for approval, respecting the measures proposed to be undertaken to address any potential environmental issues as may arise from the decommissioning of the site; and
 - b) implement the approved Closure Plan to the satisfaction of the Director.

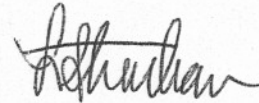
Respecting Emergency Response Planning

38. The Licencee, within 90 days of the issuance of this Licence, shall submit for approval of the Director, a contingency plan in accordance with the Manitoba Industrial Accidents Council (MIAC) *Industrial Emergency Response Planning*

Guide, outlining procedures to be used in the event of a leak, spill, fire, or other hazardous condition at the Development.

REVIEW AND REVOCATION

- A. If, in the opinion of the Director, the Licencee has exceeded or is exceeding or has or is failing to meet the specifications, limits, terms, or conditions set out in this Licence, the Director may, temporarily or permanently, revoke this Licence.
- B. If, in the opinion of the Director, new evidence warrants a change in the specifications, limits, terms or conditions of this Licence, the Director may require the filing of a new Proposal pursuant to Section 10 of The Environment Act.
- C. The Director shall review the specifications, limits, terms and conditions of this Licence no later than three years from the date of issuance.



Larry Strachan, P. Eng.
Director
Environment Act

Client File No.: 4777.00

**Attachment 'A' to
Environment Act Licence No. 2561 – Motor Coach Industries Limited**

Legal Description of Development

Lot twenty-two in Block lettered "A" which Lot is shown on a plan of survey of part of Lots one and two of the Parish of Saint Boniface, and part of Lots thirty-one to thirty-five of the Parish of Saint Vital, in Manitoba registered in the WLTO as No. 944;

Lots twenty-three, twenty-four and twenty-five, excepting out of said Lot twenty-three the most southerly six hundred and fifty feet in depth of the most easterly one hundred feet in width thereof, in Block Lettered "A" which lots are shown on a plan of survey of part of Lots thirty-one to thirty-five of the Parish of Saint Vital, and of part of Lots one and two of the Parish of Saint Boniface in Manitoba registered in the WLTO as No. 944;

The most southerly six hundred and fifty feet in depth of the most easterly one hundred feet in width of Lot twenty-three in Block lettered "A" which lot is shown on a plan of survey of part of Lots one and two of the Parish of Saint Boniface and of part of Lots thirty-one to thirty-five of the Parish of Saint Vital, in Manitoba registered in the WLTO as No. 944;

Lot twenty-six, in Block lettered "A" which lot is shown on a plan of survey of part of Lots thirty-one to thirty-five in the Parish of Saint Vital, and of part of Lots one and two of the Parish of Saint Boniface in Manitoba, registered in the WLTO as No. 944;

First, ELY 30 feet perp. Lot D Plan 9122 WLTO in rural lot 1 to 5 Parish of St. Boniface and rural lot 34 and 35 Parish of St. Vital, and, secondly, SP Lot 10 Plan 22672 WLTO in rural lot A, 2, 3 Parish of St. Boniface and in rural lot 34 and 35 parish of St. Vital.

**Attachment 'B' to
Environment Act Licence No. 2561**

Compound Listing – Motor Coach Industries Limited¹

Common Name	CAS No.	Carcinogen ² (Y/N)
1,2,4-trimethyl benzene	95-63-6	- ³
1,6 hexamethylene diisocyanate	822-06-0	-
2-butoxyethanol	111-76-2	Y ⁴
acetone	67-64-1	N ⁵
aluminum oxide	1344-28-1	-
chorodifluoromethane	75-45-6	N
chromium; hexavalent chromium	7440-47-3	Y
cyclohexane	110-82-7	-
dibutyltin dilaurate	77-58-7	-
diphenylmethane diisocyanate	101-68-8	N
ethylbenzene	100-41-4	N
ethylene glycol monobutyl ether acetate	112-07-2	-
heptane	142-85-5	-
hexyl acetate isomers	88230-35-7	-
hydrofluoric acid	766-39-3	-
isobutyl alcohol	78-83-1	N
magnesium oxide	1309-48-4	-
manganese	7439-96-5	N
methanol	67-56-1	N
methyl amyl ketone	110-43-0	-
methyl ethyl ketone (MEK)	78-93-3	N
methyl pyrrolidone	872-50-4	-
methylene chloride	75-09-2	Y
n-hexane	110-54-3	N
nickel	7440-02-0	-
petroleum naptha	64742-88-7	-
phosphoric acid	7664-38-2	N
polychloroprene	25267-15-6	-
primary amyl acetate	628-63-7	-
propylene glycol	57-55-6	N
propylene oxide	75-56-9	Y
styrene	100-42-5	N
sulphuric acid	7664-93-9	-
toluene	108-88-3	N
xylene	1330-20-7	N

Notes:

1. The above compound listing is based on information provided in the EIA and is to be reviewed and updated on an as needed basis by the Licencee. Any additions are to be brought to the attention of the Director.
2. Carcinogenicity based on United States Environment Protection Agency Integrated Risk Information System (IRIS) database. Possible, probable and known carcinogens are to be identified.
3. Not identified in IRIS database shown as '-'.³
4. An identified possible, probable or known human carcinogen related to inhalation shown as 'Y'.⁴
5. Not assessed in IRIS database for carcinogenicity related to inhalation, or weight of evidence not conclusive shown as 'N'.⁵

Attachment 'C' to Environment Act Licence No. 2561

Materials Used Containing Listed VOCs/Particulates – Motor Coach Industries Limited

Materials Used	Process Where Material Used	Total Mass	Total Volume	VOC/Particulate Component ^{1,2}	CAS Number	VOC / Particulate Content ³	Disposal ⁴ – Recover	Disposal ⁴ – Air	Disposal ⁴ – Sewer	Disposal ⁴ – Solid Waste	Disposal ⁴ – Other

Notes:

1. Record all VOCs used in the Development in quantities greater than 100 kg per year.
2. Record usage of any compound classified as a probable or known carcinogen and identify with 'C'.
3. Expressed as mass in kilograms
4. Expressed as mass in kilograms

Total Use and Disposal by Compound - Motor Coach Industries Limited

Compound ^{1,2}	CAS Number	Processes Involved	Total Mass Used ³	Total Mass Disposed/ Released ³	Disposal ³ - Recover	Disposal ³ - Air	Disposal ³ - Sewer	Disposal ³ - Solid Waste	Disposal ³ - Other

Notes:

1. Record all Compounds used in the Development from Attachment 'C'.
2. Record usage of any compound classified as a probable or known carcinogen and identify with 'C'.
3. Expressed as mass in kilograms

Attachment 'E' to Environment Act Licence No. 2561

Total Use and Disposal by Process - Motor Coach Industries Limited

Process	Compound ^{1,2}	CAS Number	Total Mass Used ³	Total Mass Disposed/Released ³	Disposal ³ - Recover	Disposal ³ - Air	Disposal ³ - Sewer	Disposal ³ - Solid Waste	Disposal ³ - Other

- Notes:
1. Record all Compounds used in the Development from Attachment 'C'.
 2. Record usage of any compound classified as a probable or known carcinogen and identify with 'C'.
 3. Expressed as mass in kilograms

Attachment 'F' to Environment Act Licence No. 2561

Non-Listed VOC Use – Motor Coach Industries Limited

VOC Component ^{1,2}	CAS Number	Total Mass	Total Volume	Disposal ³ – Recover	Disposal ³ – Air	Disposal ³ – Sewer	Disposal ³ – Solid Waste	Disposal ³ – Other

- Notes:
- 1. Record all VOCs used in the Development in quantities greater than 100 kg per year.
 - 2. Record usage of any compound classified as a probable or known carcinogen and identify with 'C'.
 - 3. Expressed as mass in kilograms