SUMMARY OF COMMENTS / RECOMMENDATIONS

PROPONENT: **New Flyer Industries Limited**
PROPOSAL NAME: **Bus Manufacturing Facility**
CLASS OF DEVELOPMENT: **CLASS 1**
TYPE OF DEVELOPMENT: **Manufacturing and Industrial Plant**
CLIENT FILE NO: **4509.00**

OVERVIEW:

A proposal was filed by Mr. Bob Douglas of New Flyer Industries Limited for the continued operation of a plant to manufacture buses located at 711 Kernaghan Avenue in the City of Winnipeg. The Plant has been in operation since 1974. The current owners acquired control in 1987. As the plant was operational and unlicenced prior to 1988, there was no requirement to obtain an Environment Act Licence post 1988. There were 10 recorded complaints of noise and odour regarding the operation from 3 identified individuals between 1982 and 1987. The plant completed a major expansion in 1996/97. The owners apparently were not aware that they were required to notify the Department prior to making an alteration to the plant. The expansion came to the attention of the Environmental Approvals Branch in October, 1998. New Flyer was directed to submit an Environment Act Proposal on November 6, 1998.

Production processes involve bus frame manufacture and assembly, corrosion protection of components, undercoating, and bus assembly and finish coating. Engines are not installed in the units at this facility. There is a potential for emissions of particulate matter; primer and base/top coating vapours and particulates; solvent vapours; and noise. The particulate emissions are controlled by filter panels and baghouses. There is no effective emission control for volatile organic compounds. Normal operation is 24 hours per day Monday through Friday, 52 weeks per year.

The number of buses produced since 1990 is: 1990(456); 1991(500); 1992(500); 1993(500); 1994(545); 1995(661); 1996(832); 1997(1,143); 1998(1,350); 1999(1,377); 2000(1,478 est.).

The Department provided the Technical Advisory Committee with information on the Proposal and made public notification in the Winnipeg Free Press. The closing date for comments was May 1, 2000. The following and the commentated Draft Licence (attached) summarize the responses:

RELEVANT COMMENTS FROM THE PUBLIC

Seventy one citizens submitted comments opposing the Development. The comments were received as: 8 individual letters; 38 form letters; 1 petition with 27 names. There were several multiple submissions. Individuals were only credited once. The comments were:

	Individual/Form/Petition
Expansion without licence	6 / 38 / 27
Health	8 / 38 / 0
Property value	3 / 0 / 0
Quality of life	4 / 0 / 0
Air pollution – fumes; chemicals; dust	6 / 0 / 27
Noise	6 / 38 / 27

New Flyer Industries Limited
Summary of Comments

Bright lights at facility	1 / 0 / 0
Odour	8 / 38 / 27
White powder on ground	1 / 0 / 0
Independent consultant	2 / 0 / 0
Independent air quality evaluation	2 / 0 / 0
Participant funding	2 / 36 / 0
Meeting to discuss TAC etc	2 / 36 / 27
Joint committee established	1 / 38 / 0
NF position on decreased property values	1 / 0 / 0
Wastewater	2 / 0 / 0
Inappropriate location of New Flyer	1 / 0 / 0
Aesthetic appearance of building	1 / 0 / 0
Baghouse emissions	2 / 0 / 0
Questionable operation of APC equipment	1 / 0 / 0
Rainwater run-off	1 / 0 / 0
Litter on-site	1 / 0 / 0
Why is Public Health Act not enforced	1 / 0 / 0
How many times has New Flyer exceeded COW sewer emissions	1 / 0 / 0
How much more paint and materials are used since expansion	1 / 0 / 0
How much more emission since expansion	1 / 0 / 0
How much water (City and well) used	1 / 0 / 0
How will licence deal with water consumption	1 / 0 / 0
Should COW licence and Environment Act be linked	1 / 0 / 0
What are emissions from grit glass booth	1 / 0 / 0
How can overspray in frame priming booth be captured better	1 / 0 / 0
Want some comparison studies on industrial use of zinc and amount; impacts; is it emitted as a solvent	1 / 0 / 0
How is frame priming booth cleaned	1 / 0 / 0
How is general air in plant emitted	1 / 0 / 0
How are assembly areas cleaned	1 / 0 / 0
How will filter changes; gun cleaning; etc for paint booths be regulated	1 / 0 / 0
What are existing stack heights; what scrubbers are used on stacks; what air pressure is used to force emissions from stacks	1 / 0 / 0
WHIMIS requirements have not been completed	1 / 0 / 0
The stack for the off-line paint spray gun cleaning room is a problem	1 / 0 / 0
The maintenance and assembly areas utilizing welding must be improved	1 / 0 / 0
Does the air dispersion model deal with effects of wind; frequency of south and east wind; wind speed; direction of plume dispersment; effects of different heights of stacks and wind conditions	1 / 0 / 0
What are regulations for stack heights	1 / 0 / 0
What is the plant emergency response plan	1 / 0 / 0
What is the community emergency response plan	1 / 0 / 0
How will high zinc and BOD levels be brought into compliance with COW by-law	1 / 0 / 0
What is impact of zinc and BOD on end water source	1 / 0 / 0
How does COW treat for these chemcals	1 / 0 / 0
What is involved in over strength waste water discharge licence	1 / 0 / 0
If storm run-off from site is contaminated should it be directed elsewhere other than Pandora Is this a health concern	1 / 0 / 0
Need more detail on the 22 stacks, the heights, the diameter, the emissions, and the volume of emissions	1 / 0 / 0
What will be done to ensure the indoor area emissions do not exceed the recommended OEL for organic solvents	1 / 0 / 0
Does the model for emissions use data from the waste stream in assessing emissions; should the hazardous waste area outside the plant not be covered; should there not be containment of any spill of hazardous waste	1 / 0 / 0
There need to be developed a policy regarding changing of paint filters by number of applications and volume of paint; what are the filters for the sites which emit zinc, lead and aluminum; what else is available to reduce this emission	1 / 0 / 0
Are the stacks cleaned frequently enough	1 / 0 / 0
Need to develop a policy on specific types of paint allowed to be used; are there any international agreements	1 / 0 / 0
Problems with the SCREEN 3 model for the evaluation of mulitiple sources	1 / 0 / 0
Does the SCREEN 3 model look at emissions over a period of years	1 / 0 / 0
How will the department interpret the N-butyl Acetate emitted which exceeds the criteria	1 / 0 / 0

How will we address the additive effects of solvents exceeding the odour criteria	1 / 0 / 0
Will the odour be considered as nuisance and how will it be addressed; what technology exists and is available in other jurisdictions	1 / 0 / 0
A survey should be done of the impacts on the 3 streets north of the plant	1 / 38 / 0
Request a thorough community health assessment of the area	1 / 0 / 0
Does the SCREEN 3 model account for residential sesitivity; how does the model evaluate the accumulation of the different chemicals (additive effects)	1 / 0 / 0
How will New Flyer evaluate the mitigation measures taken for effectiveness; a survey of residents must be done; will the licence require the measures to be implemented; will the research information go to TAC for decisions	1 / 0 / 0
Will all noise mitigation measures be regulated and how will they be enforced	1 / 0 / 0
Why are improvements to the filter system not mentioned; this must be included	1 / 0 / 0
What is the approval process from now to licencing; TAC response time frame; issuance of licence time frame; etc	1 / 0 / 0
What stage is New Flyer at with ISO certification; explain to the communtity what this means	1 / 0 / 0
The proposal does not reflect the scale and magnitude of day to day operations and that the information in the proposal is not accurate	1 / 0 / 0
The plant was cleaned up and not at full operation during the open house	1 / 0 / 0
A forum must be held to inform residents of the mitigation matters planned, how the licence will be enforced, and what considerations have been made of the concerns expressed and the impact on health, property value and enjoyment	1 / 0 / 0
How much more work is being done at New Flyer since the expansion	1 / 0 / 0
What new types of work are being done since the expansion	1 / 0 / 0
How do other jurisdictions deal with emissions from similar facilities	1 / 0 / 0
Concerned that any requirements made of New Flyer will be based on a cost benefit formula	1 / 0 / 0
Use best air pollution control technology available	0 / 38 / 27
Mitigation measures reviewed by TAC and in licence	0 / 38 / 0
Enforcement of licence	0 / 38 / 0
Clear complaint process needed	0 / 38 / 0
Environmental guidelines be issued	1 / 2 / 0
Public Hearing be held	1 / 2 / 0
Participant assistance be provided (funds and expertise)	1 / 2 / 0
What is the volume of paint used in the air dispersion model	1 / 0 / 0

The appropriate comments were forwarded to Morrow Environmental Consultants for response or responded to by the Branch.

Disposition: Those items falling under the approvals process have been addressed.

RELEVANT COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

1. **Manitoba Culture, Heritage & Citizenship – Historical Resources Branch** – has no concerns.

   No response necessary.

   Disposition: No action needed.

2. **Manitoba Industry, Trade and Mines – Industry Development Division** – did not respond.

   No response necessary.

   Disposition: No action needed.

3. **Manitoba Conservation – Environmental Management Division – Water Quality Management Section** – did not respond.

   No response necessary.

Disposition: No action needed.

4. **Manitoba Conservation – Environmental Management Division – Air Quality Management Section** – has the following comments:

1) Section 3.3.6, page 12: Given that an estimated 90% of the paint mist is removed, 10% would be emitted from the facility. There does not seem to be any air dispersion modelling done of these particulate emissions.

The proponent replied that fugitive emissions of paint particulates were not seen as a significant factor. There are difficulties in determining the actual emissions as you must allow for adhesion on the walls, floor and ceiling. However, it can be calculated that the peak 24 hour will be 14 $\mu g/m^3$, not considering adherence.

The TAC member questioned how the 24 hour average was calculated from the 1 hour average of the model.

Disposition: EPA guideance document recommends using a factor of 0.4. No further action required.

2) Section 5.5.2, page 24: As a check, the emissions used for the air dispersion modelling should be compared to the NPRI data for the facility to verify that the two sets of emissions data are consistent.

The proponent replied that it is difficult to compare the air emission data to the NPRI because certain compounds are not considered in NPRI (eg. acetone).

Disposition: The MSDSs were reviewed and 7 additional compounds were selected for modelling and included in assessment. No further action required.

3) Section 6.2.2, Table 6:

Criteria with averaging times shorter than 24-hours are available from the Ontario Ministry of Environment. These could have been used for comparison to the 1-hour averages calculated by the air dispersion modelling instead of the 24-hour criteria listed. For some of the criteria, the 24-hour criteria are the same as the 1/2 hour Point of Impingement criteria (*i.e.,* acetone, ethyl acetate, ethyl alcohol, ethyl benzene, isopropyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, styrene, toluene, and xylenes).

The proponent replied that the use of the 24h standard resulted in the most conservative estimates.

The averaging period was not correctly noted for several of the substances (*i.e.*, ethyl acetate, ethyl alcohol, ethyl benzene, n-hexane, methyl alcohol, and naphthalene (health)).

The proponent replied that all substances were treated as 1 h averaging times. Again, this provided a more conservative estimate.

A source of peer-reviewed odour threshold data is the document: American Industrial Hygiene Association (AIHA), 1989. *Odor Thresholds for Chemicals with Established Occupational Health Standards.* For some of the substances, the AIHA reference provides lower odour thresholds than given in Table 6 (*i.e.,* n-butyl acetate, isopropyl alcohol, and styrene). The AIHA data are given as geometric means of the 50% panel responses from different studies.

The proponent replied that there is a wide range of reported values for odour thresholds. Mid-values were used when variation was encountered.

The TAC member replied that other odour criteria are peer reviewed and critiqued.

Disposition: No further action required.

4) Section 6.3, page 33: Given that the air dispersion modelling indicated that emissions could result in odours in the surrounding residential area, the use of the odour nuisance clause in the *Environment Act* licence for this facility is recommended. New Flyer Limited should be encouraged to continue to further reduce VOC emissions from the plant.

   No response necessary.

5) Table 14, Mitigation: What are the anticipated effects of the mitigation measures? Will they be sufficient to reduce the incidence of odour nuisance in the surrounding residential areas?

   The proponent replied that mitigation measures anticipated or implemented since the proposal was submitted are supplied in the updated Table 14.

   The TAC member questioned what the follow up to mitigation will be.

Disposition: No further action required.

Appendix II:

6) Section 1.2.2, Fugitive emissions, page 7: It is unusual that the peak exposure levels occurred so far (*i.e.*, 795 m) from the building, given that it was modelled as a non-buoyant volume source. I would have expected the maximum concentration to be at the building and to decrease with distance.

   The proponent replied that a more refined estimate of exposure levels from the fugitive emissions was conducted showing worst case conditions. This indicated the peak concentration was closer to the facility at 186 m, but that these levels were also reduced.

   The TAC member replied that no details of the refined analysis were provided.

Disposition: No further action required.

7) Section 4.0 Dispersion Model, page 16: Because of the large number of stacks emitting VOC's from the facility, it would have been preferable for the consultant to use the US EPA Industrial Source Complex (ISC3) rather than Screen3. This would have avoided the need to merge stacks and to make assumptions regarding the overlap between sources. ISC3 could have been used in the screening mode with the same meteorological data set as for Screen3.

   The proponent replied that the use of SCREEN 3 had been discussed with the Department. It overestimates peak emissions. If SCREEN 3 showed potential health effects, a more refined model would be used. As this was not the case, the use of a more complex model is not warranted.

   The TAC member replied that the calculations of combining stacks was not provided.

Disposition: This information was provided for a later modelling scenerio. No further action required.

8) Section 4.2.1 Frame Booth, page 19: The maximum concentration for the 1 g/s emission rate is 135 µg/m^3, not 97 µg/m^3 as stated in the 3rd paragraph. The 97 µg/m^3 is the maximum of the concentrations for the automated distances receptors. Figure 1 also incorrectly shows 97 µg/m^3 as the maximum concentration. In Table 6a, the peak concentration for n-butyl alcohol is incorrect; (5.829 g/s)(0.135 mg/m^3/g/s) = 0.79 mg/m^3.

   The proponent replied that 135 µg/m^3 should have been reported. It was used in all calculations. Figure 1 is correct. In Table 6a, the calculation would be for aromatic naptha and the correct calculation is 0.135.

Disposition: No further action required.

9) Section 4.2.2 Primer Booths, page 19: The maximum concentration (146 µg/m^3) is not shown on Figure 2. Since there are two Primer Booths, it would be possible to have two busses being painted at one time. It appears, however, that only the emissions for one bus were incorporated in the modelling so that the maximum concentrations should be higher by a factor of two. The overall conclusions from this section do not appear to change, however, when the additional factor of two is applied.

The proponent replied that Figure 2 is correct as presented. The model calculated the effect of one booth operating. However, the exercise assumed all booths at the facility were operating at the same time, all the time under worst case meteorlogical conditions. It also assumes that peak impact points will coincide which is not possible.

Disposition: No further action required.

10) Section 4.2.3 Paint Booths, page 20: As for Sections 4.2.1 and 4.2.2, the maximum concentration of 146 µg/m^3 is not shown on accompanying figure. As for the Primer Booths, the estimated concentrations should be multiplied by a factor of two to account for the possibility of two buses being painted at the same time.

The proponent replied that the previous response also applies to this item.

Disposition: No further action required.

5. **Environment Canada – Canadian Environment Review Agency** – state that the application of the *Canadian Environmental Assessment Act* with respect to this project will not be required.

No response necessary.

Disposition: No action needed.

6. **Manitoba Conservation – Policy Coordination Branch** – has no concerns:

No response necessary.

Disposition: No action needed.

7. **Manitoba Intergovernmental Affairs – Community Economic Development Services** – did not comment.

No response necessary.

Disposition: No action needed.

8. **Manitoba Conservation – Environmental Operations Division – Winnipeg Region** – recommend that the proponent be asked to rerun the dispersion model, this time using a suitable model (e.g. ISC) to model the 22 relevant stacks, and include specific data for this location (building dimensions, Winnipeg Meteorological data, etc.), and have the following comments:

1) Section 3.3.3 Corrosion Prevention. The panel filters in the Frame Priming Booth will capture only a portion of the PM. There is no VOC capture or control from this type of system. Another concern is fine metal (corrosion inhibitors, tinters, etc.) emissions.

The proponent replied that there are no corrosion inhibitors or tinters.

The TAC member questioned what is done for corrosion prevention.

Disposition: No action needed.

2) Section 3.3.5 Undercoat Booth. MECI note that booth filters are discharged as solid waste, but do not indicate what type (if any) of air emission controls are applied to the Undercoat Booths.

The proponent replied that filters are applied in the undercoat booth.

The TAC member replied that filters will not remove the fine particulate or vapours.

Disposition: No action needed.

3) Section 3.3.6 Paint Preparation. Are the stainless steel parts sanded using sand blasting? Are there any air emissions from this process?

The proponent replied that preparation is done by hand in front of the undercoat booths. There is no direct emission from this area.

Disposition: No action needed.

4) Section 3.3.6. Base Coat/Prime Booth. The panel filters in the spray booth will capture only a portion of the PM. There is no VOC capture or control from this type of system. Another concern is inorganic components of the paints. Has New Flyer considered the use of electrostatic HVLP spray guns, which can increase transfer efficiency to above 90%? Have water based (low VOC) formulations been considered?

The proponent replied that New Flyer is in the process of switching to HVLP guns as outlined in Table 14. New Flyer also implements CCME Guidelines for the reduction of VOCs for the automotive industry.

Disposition: No action needed.

5) Section 3.3.6. Topcoat Booth. Same comment as for Base Coat/Prime Booth.

See previous response.

Disposition: No action needed.

6) Section 3.3.10 Offline Processes. VOC emissions from the stack from the Spray Gun Cleaning Room and Solvent Recovery System, Touch-up Booth, Parts painting, Steel Parts Priming Area, and Mixing Rooms do not appear to have any emission controls and should be considered in any dispersion modelling.

The proponent replied that these sources were modelled and included in the 5 main booths.

Disposition: No action needed.

7) Section 5.4 Air Emissions. Only 18 of the 22 emission stacks are identified on Drawing W8133C-007. The presence/absence of air emission control devices is not noted in relation to these stacks.

The proponent replied that the drawing was in error and a corrected version is submitted. Air emission control devices are identified in Section 6.1.1 of the proposal.

Disposition: No action needed.

8) Section 6.0 Impact Assessment. Complaints from nearby residents should also have been part of the matrix evaluation system.

The proponent replied that a listing of complaints was requested from the Department and refused because of confidentiality.

Disposition: No action needed.

9) Section 6.0 Impact Assessment. The consultant reports that "under upset conditions, all potential impacts except for air emissions (VOCs, odour and noise) are mitigatable using in-house measures/prevention." Is New Flyer, or their consultant, in the process of devising a plan for such a contingency?

The proponent submitted an outline of contingency plans to deal with the above.

The TAC member felt the question had not really been answered.

Disposition: No action needed.

10) Section 6.1.1 Particulate Emissions. The statement that the "…potential for welding particulates to impact the surrounding community is low." Was based on an IAQ assessment for exposure to total particulate matter, not metal species, so the conclusion is questionable.

The proponent replied that data was not available for metal speciation. Total particulates indicate it is not likely a community exposure problem. However, the percentages of metals in fume were calculated and extrapolated into the dispersion model. Exposure standards are acceptable.

The TAC member queried how the new list of metals compare to the parameter list used by other jurisdictions.

Disposition: No action needed.

11) Section 6.1.1 Particulate Emissions. The data in Table 5 indicates that over 3 tonnes of Zinc is released to the atmosphere on an annual basis. Was a risk assessment conducted on this and other metals? If not, why not? What is the basis for the consultant's statement that "As a result of mitigation measures used (booth filters), particulate metal emissions off site to the surrounding environment are considered minimal."

The proponent replied that the total amount of zinc released will result in a peak ambient level less than the 24 hour standard. The filter attachment system was modified and improved to prevent bypass of particulates. Metals discharged during painting were also modelled as peak emissions and results indicated levels within exposure criteria.

The TAC member queried as previous comment.

Disposition: No action needed.

12) Section 6.1.1 Particulate Emissions. The manufacturers removal efficiencies of the panel filters are only one aspect in what the actual PM release will be. In our experience, some filters are often misaligned and not replaced when they have already achieved their maximum loading potential. A SOP is very useful in these situations. In addition, what size range does the manufacturers filter efficiency rating refer to? Is this the same size range as generated at New Flyer?

The proponent submitted information on filter replacement procedures and capture efficiencies.

Disposition: No action needed.

13) Section 6.1.2 Solvent Vapour Emissions. The consultant indicates in Table 14 that the residual environmental impact of solvent vapour emissions/odours *after mitigation is high*. A supplementary plan should be drafted to reduce this to acceptable levels for the community.

The proponent submitted a revised Table 14 containing additional mitigation measures.

Disposition: No action needed.

14) Section 6.2.1. Potential Substances of Concern. The list of substances of potential concern seems quite small for an operation of the size of New Flyer. I suggest that the inventory and MSDS's be reviewed again to ensure that all substances of potential concern have been identified and properly assessed. The list only includes VOCs (as OHG Consulting was only asked to review solvent vapour emissions). Metals should also be reviewed to determine if they are a potential concern. Are catalysts or activators used at New Flyer?

The proponent replied that the substances reviewed were based on ability to measure emission rates and the availability of exposure criteria. Catalysts and activators were not identified as risk drivers and therefore as not significant. Metals were reviewed.

The TAC member stated the response was unacceptable.

Disposition: The MSDS's were reviewed in-house and an additional list of compounds was modelled. No action needed.

15) Section 6.2.2. Air Quality Criteria. The 3M Respirator Selector Guide is not the type of guideline that should be used here (the consultant does not indicate how they used the 3M data). Respirator selector guides are designed around workplace TLV's, for healthy individuals employed for 40 hour work week. Ambient guidelines are far more restrictive as the general public has a much broader age and health status range, and their exposure can be much longer (hours) per work week.

The proponent replied that the use of 3M guide is appropriate.

Disposition: No action needed.

16) Section 6.2.3 Modelling/ Section 6.2.4 Modelling Results. The wrong dispersion model was used to predict the maximum ground level concentration of emission parameters. The Screen3 Model, used by the consultant, does not account for multiple stacks, and does not use actual onsite meteorological data (usually the closest airport). The consultant should have used the US EPA ISC Model, which has the ability to utilise actual onsite meteorological data and multiple source stacks.

The proponent replied that the use of SCREEN 3 had been discussed with the Department. It overestimates peak emissions. If SCREEN 3 showed potential health effects, a more refined model would be used. As this was not the case, the use of a more complex model is not warranted.

The TAC member found the response unacceptable but deferred to the judgement of the Air Quality management group.

Disposition: No action needed.

17) Section 6.2.4.1. Additive Effects. How were the additive effects calculated? What protocol was used?

The proponent replied that the additive effects were calculated according to protocol "the case when data is available only for mixture components" as described in Notices, Environmental Protection Agency (FRL-2984-2) Guidelines for the Health Risk Assessment of Chemical Mixtures.

Disposition: No action needed.

18) Section 6.3. Impact to Surrounding Environment. No conclusions should be relied upon until the dispersion modelling has been repeated using an acceptable model.

The proponent replied that this has been discussed and the methodology was appropriate.

The TAC member stated the original concern stands.

Disposition: No action needed.

19) Section 8.3.1. Impact Mitigation Measures Implimented – Odour Emissions. No details are provided on what percentage of the VOC based finishes have been replaced with water based finishes, and what type of change can be expected in potential offsite impact.

The proponent submitted a news letter sent to the residents outlining the mitigation measures which have been implemented.

20) Section 8.3.2. Impact Mitigation Measures Under Evaluation. Where possible VOC emissions should be reduced, not just dispersed in a more efficient manner.

The proponent replied that this section deals with noise not odour. The point raised of reduction vs. dispersion is well taken.

Disposition: No action needed.

General Disposition: Those relevant items still of contention are addressed in the Draft Licence.

9. **Manitoba Agriculture – Soils and Crops - Soil Resource Section** – did not respond.

   No response necessary.

   Disposition: No action needed.

10. **Manitoba Highways and Transportation - Highway Planning and Design** – did not respond.

    No response necessary.

    Disposition: No action needed.

11. **Manitoba Health - Public Health - Environmental Unit** – submitted relevant late comments as follows:

    1) Are exhaust air from the filter houses, wash bay, assembly and degreasing area vented to the work area acceptable for worker safety?

       The proponent replied that it is common for processes to exhaust into the workplace. An occupational hygene study was conducted for worker safety and in some areas additional personal protective equipment was recommended.

    2) Are the transfer efficiencies for the painting process with acceptable ranges?

       The proponent replied that the values given were taken from the literature and are typical for the operation.

    3) It would be prudent to have spill containment for the outdoor hazardous wastes.

       The proponent replied that a hazardous material storage shed was currently being installed at New Flyer. Spill drain covers are also available and staff are trained in the handling of hazardous waste.

    4) The report states that the air dispersion modelling indicates that the potential for adverse health effects to occur off site as a result of air emissions from the facility is low. I don't believe that this statement is supportable since health effects were not factored into the model.

       The proponent replied that health effects were part of the model. When the health effects for the chemicals were added, there was no overexposure even under worst case conditions with all booths in operation at the same time. The only predicted problem was with odours.

    Disposition: The TAC member replied that the proponents response addressed all specific concerns. The member also stated that New Flyer make a concerted effort to address the concerns of odour and noise within the community. The Draft Licence addresses these issues.

12. **Manitoba Labour - Workplace Safety and Health Division** – did not respond.

    No response necessary.

    Disposition: No action needed.

OPEN HOUSE:

New Flyer conducted an open house for the community in February, 2000, and in May, 2001.

PUBLIC HEARING:

Requests received for public hearings were:

a) 1 individual letter from an advocate;

b) 7 form letters from residents; and

c) 1 letter from the President of the New Manitoba Evironmental Council (NMEC).

Some of these responses also requested the establishment of guidelines for the EA, and participant assistance. Two letters from CEC/NMEC members also expressed the usefullness of a CEC Hearing.

RECOMMENDATIONS:

A Licence considering the above relevant concerns as well as those of the Approvals Branch be prepared and issued. It is a consideration for the licencing of this Development that some of the information which has been requested is not available. This Licence contains conditions which are intended to provide the means and time for the proponent to gather and submit additional information, and also provides the Department with the means to regulate the Development in an environmentally responsible fashion. Responsibility for enforcement of the Licence should be shared with the Region and may be transferred to the Region upon the completion of the final assessment of the emissions from the Development.

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