

DATE: June 17, 2014

TO: Tania Steele

FROM: Eshetu Beshada, Ph.D., P.Eng.
Environmental Engineer
Mines and Wastewater Section
123 Main Street
Ste. 160 Union Station
Winnipeg, Mb R3C 1A5
Ph:204 945-7023

SUBJECT: **Structural Composite Technologies Ltd. – Information for Public Registries**

Tania,

Please find attached the public and TAC correspondence related to the Structural Composite Technologies file (5594.00) for distribution to the public registries. The documents included are:

Public Comment

- June 9, 2014 letter from C. F. Green, 1 page
- June 8, 2014 letter with attachment from Elizabeth Evans, 10 pages
- May 27, 2014 letter with attachment from Susan Zaikow, 3 pages

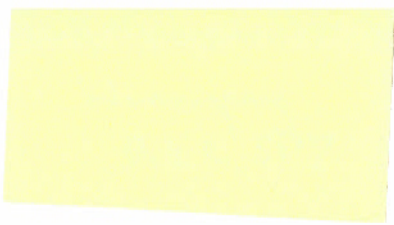
TAC Comments:

- June 10, 2014 email from Jason Kelly, 1 page
- June 9, 2014 email from Adara Kaita, 1 page
- June 9, 2014 memo from Muntaseer Ibn Azkar, 1 page
- June 6, 2014 email from James Stibbard, 1 page
- May 23, 2014 email from Kevin Jacobs, 1 page
- May 23, 2014 memo from Environmental Compliance and Enforcement, 1 page
- May 20, 2014 e-mail from Caroline Boissonneault, 1 page
- May 12, 2014 e-mail from Dan Roberts, 1 page
- May 9, 2014 e-mail from Dale Sobkowich, 1 page
- May 9, 2014 letter from Ryan Coulter, 1 page

24 pages total

Thank you.

Eshetu Beshada, Ph.D., P. Eng.



June 5th 2014

Ref. # File 5594.00

Dear Sir,

While I am not against licensing this plant, I would ask that every effort is made to minimize emissions.

This area has been subject to VOC emissions from New Flyer Industries for many years.

It has taken much consultation and change of ownership and management to reach the relatively low levels that we now enjoy.

Yours Sincerely,

C.P. Green

June 8, 2014

Eshetu Beshada
Environmental Engineer
Environmental Approvals
Manitoba Conservation
160 – 123 Main Street
Winnipeg, MB R3C 1A5

Dear Mr. Beshada:

Re: Structural Composite Technologies Ltd. (SCT)
Environment Act Proposal - File #5594.00

In response to the Notice of Environment Act Proposal appearing in the May 10th, 2014 Winnipeg Free Press, I wish to respond with my concerns regarding this proposal. I would ask that my street and email address not be made public in any form. My submission may be placed on the public files and may be made available to the affected parties.

I understand that SCT was previously located at 20 Burnett St. I also understand that while at that location there were numerous odour complaints made to Manitoba Conservation regarding noxious fumes coming from this area. I myself had driven through the stifling odours coming from this plant. Since SCT moved from that area, the air quality has substantially improved in that location.

The area where SCT is now located (100 Hoka Street) is in an area that has and continues to have issues with emissions from manufacturing facilities. New Flyer Bus Manufacturing facility is located next to the SCT plant. We have had ongoing issues with emissions from New Flyer for more than a decade. I am attaching a Odour Log Sheet from Eric St.Pierre of New Flyer Industries documenting the occurrences of odours in our neighbourhood. I am submitting this documentation to become part of the review of the Environmental Assessment Proposal. This email was first sent in March 2013 and lists odour events from 2010 to 2013. While New Flyer has made strides in reducing their emissions, there still are issues with air quality. The last thing this residential

neighbourhood needs is another source of air pollution. You will notice in the Odour Log that there are occurrences of emissions from SCT. As this Odour Monitoring by New Flyer is ongoing, there is more recent data available from Eric St.Pierre of New Flyer Industries.

In 2005 the City of Winnipeg began a study of the area known as the Transcona Yards Industrial Neighbourhood Area Redevelopment Plan. I was a participant in that study. The outcome of the committee was that in recognition of the expanding residential development and the resulting conflicts between residents and businesses that future developments be of a compatible nature such as light industrial and commercial etc. This Area Redevelopment Plan was accepted and passed by City of Winnipeg Council in 2008. SCT is located within this area redevelopment plan.

I am very much concerned that in the Environment Proposal the surrounding area was classified as "Rural" for the dispersion factor. The area is definitely an "Urban" setting with a high density two story condo residential neighbourhood directly north of SCT. This residential area will be and currently is greatly impacted by the fumes being emitted from this facility. Has anyone from Conservation physically inspected the site to take note of the residential component directly to the north, northeast and northwest of the building? The drawings submitted are outdated and in the case of Figure No 2 of the Site Plan Dated October 2007 does not show any residential development whatsoever. The Aerial Photos of the site are Circa 1988 and earlier. How can decisions be made on inaccurate outdated information? I am appalled at this. Why was this accepted? Why was this classification not challenged?

I also take issue with the fact that the meteorological data used was from the Bismark, North Dakota weather station. The predominant wind direction in Winnipeg is south especially in the summer months and this is when we have the greatest impact of emissions from this plant. Using Winnipeg meteorological data would provide true local wind speeds and direction. Why was the Bismark data not rejected and the Winnipeg data requested?

In the report, the process description states that Acetone is used for cleaning purposes but I do not see it listed in the dispersion modeling. Acetone is 100% volatile and is a loss from the process. It should form part of the dispersion modeling and though it may occur over a very short time period, it should not be averaged over a longer time period. What is the composition of the Acetone being used and does it contain Benzene which is known to be hazardous to humans? The Province of Manitoba requires reporting of this chemical. Why was this not questioned?

The chemicals being used in the SCT facility are of a concern to the residents with Styrene and Duranap Cobalt 6 being listed as possible human carcinogens. Many of the other chemicals have chronic health hazard labels attached to them. I find the Dispersion Modeling to be insufficient; it appears to be done using the 24 hour criteria. I believe the industry standard is to use a ½ hour POI criteria and in the case of many odour causing chemicals, the modeling is done on 10 minute and 2 minute time periods. Why was the ½ hour POI limit not modeled? I also find it troubling that the highest modeling results were excluded from the report to account for extreme, rare and transient meteorological conditions. Although dispersion modeling regulations allow for the exclusion of the 8 highest readings, many consultants include them to reflect true real world conditions. I think given the close proximity to residential housing, this would be an automatic inclusion.

The report states that emissions from the plant are vented through 4 exhaust stacks equipped with filters. It also states that the filter efficiency is estimated to be 20 to 30% of the emissions. That means that 70 to 80% of the emissions are landing in our yards and coming through our windows. No wonder the air is thick with fumes coming from this plant. The Styrene levels are closely monitored inside the plant but what about outside? The modeling does not provide the concentration isopleths for each of the chemicals to tell us how much we are being exposed to on a constant basis with a south wind.

While we residents appreciate the opportunity to comment on this Proposal, we find the technical information not to be user friendly. We residents must go to great lengths to have this information deciphered for our consumption.

Your Mission Statement states: **“The Environmental Approvals Branch will ensure that developments are regulated in a manner that protects the environment and public health, and sustains a high quality of life for present and future Manitobans”**. I hope these are not just words on a piece of paper. We residents are only asking that we be able to walk in our neighbourhood and enjoy our yards without fearing what we are being exposed to.

I would ask that your department request from SCT the additional information that I have addressed in this letter. Decisions can not and should not be made on outdated and inaccurate information. The chemicals being used at SCT are of a nature that has been recognized as possible human carcinogens and chronic health hazards. We need actual ambient air testing and not modeling to truly assess these emissions.

It is my understanding that SCT was asked to submit an Environmental Assessment Proposal to Manitoba Conservation as a result of complaints received from area residents.

As the area becomes more populated, the complaints will only intensify if proper remedial measures are not required prior to the license being issued. One would have thought SCT would have addressed these issues upon moving into a new location.

I have put considerable time and effort into this submission and I truly hope my observations and requests will be taken seriously.

Thank you for the opportunity to put forth my views.

Yours truly,

Elizabeth Evans

5/20/2010	1403	solvent	630 Melrose Ave. W.	S	190	22	28	25	zinc
5/21/2010	1342	solvent	630 Melrose Ave. W.	SSW	220	20	26	30	zinc
5/25/2010	1830	solvent	630 Melrose Ave. W.	SSW	220	37	19	51	zinc
2/25/2010	1028	odour	708 Melrose Ave. W.	S	180	39	-13	67	zinc
3/8/2010	1349	odour	708 Melrose Ave. W.	S	180	26	1	100	zinc
3/29/2010	1010	odour	708 Melrose Ave. W.	S	180	39	8	69	zinc
4/19/2010	1414	odour	708 Melrose Ave. W.	SSE	140	9	22	17	finish paint
4/23/2010	1014	odour	708 Melrose Ave. W.	SSW	220	15	19	28	zinc
4/27/2010	1014	odour	708 Melrose Ave. W.	S	190	13	15	35	zinc
4/28/2010	1111	odour	708 Melrose Ave. W.	SSE	150	39	19	30	zinc
5/12/2010	939	odour	708 Melrose Ave. W.	SSE	160	13	12	54	zinc
5/14/2010	914	odour	708 Melrose Ave. W.	S	190	15	13	68	zinc
5/20/2010	941	odour	708 Melrose Ave. W.	S	190	11	25	34	zinc
5/25/2010	927	odour	708 Melrose Ave. W.	S	180	44	19	58	zinc
3/1/2010	1630	chemical smell	711 Brewster Street	S	180	17	-5	67	zinc
6/4/2010	1457	solvent	630 Melrose Ave. W.	W	280	17	20	65	?
6/7/2010	1035	solvent	630 Melrose Ave. W.	SSW	210	11	21	56	zinc
6/16/2010	1338	solvent	630 Melrose Ave. W.	S	190	15	26	45	zinc
6/18/2010	1236	solvent	630 Melrose Ave. W.	SW	230	22	15	98	zinc
7/7/2010	1335	solvent	630 Melrose Ave. W.	SSW	220	19	23	57	zinc
7/7/2010	1843	solvent	630 Melrose Ave. W.	W	280	17	22	61	?
7/21/2010	1421	solvent	630 Melrose Ave. W.	S	190	17	26	47	zinc
7/21/2010	1828	solvent	630 Melrose Ave. W.	S	170	13	26	48	zinc
7/30/2010	1600	solvent	630 Melrose Ave. W.	NNE	30	6	24	73	?
6/3/2010	929	odour	708 Melrose Ave. W.	S	170	9	20	58	zinc
6/3/2010	1910	odour	708 Melrose Ave. W.	S	170	11	19	55	zinc
6/7/2010	1005	odour	708 Melrose Ave. W.	SSW	210	11	21	56	zinc
6/22/2010	1425	odour	708 Melrose Ave. W.	S	190	17	24	73	zinc
6/25/2010	1930	odour	708 Melrose Ave. W.	SSW	210	7	24	66	zinc
7/5/2010	1048	odour	708 Melrose Ave. W.	SSW	200	28	25	54	zinc
7/5/2010	1430	odour	708 Melrose Ave. W.	S	180	30	27	45	zinc
7/12/2010	930	odour	708 Melrose Ave. W.	S	190	9	20	58	zinc
7/12/2010	1820	odour	708 Melrose Ave. W.	S	180	19	24	42	zinc
9/28/2010	1310	odour	708 Melrose Ave. W.	S	180	30	18	71	zinc
6/15/2010	1800	chemical smell	711 Brewster Street	S	170	15	22	68	zinc
7/16/2010	1845	chemical smell	711 Brewster Street	N	350	13	22	66	?
10/5/2010	1500	solvent	630 Melrose Ave. W.	SSW	200	24	21	51	zinc

10/7/2010	1240	solvent	630 Melrose Ave. W.	SSW	210	20	23	41	zinc
10/15/2010	2123	solvent	630 Melrose Ave. W.	S	190	30	13	57	zinc
10/19/2010	1225	solvent	630 Melrose Ave. W.	SW	240	22	15	41	zinc
11/7/2010	1352	solvent (Sunday)	630 Melrose Ave. W.	S	170	22	14	67	zinc
11/24/2010	1255	smell	630 Melrose Ave. W.	SSE	140	26	-5	90	finish paint
10/7/2010	1800	chemical smell	711 Brewster Street	S	180	11	19	50	zinc
1/23/2011	1256	odour	630 Melrose Ave. W.	S	180	43	-17	84	zinc
1/26/2011	1400	solvent	630 Melrose Ave. W.	S	190	20	-7	86	zinc
1/26/2011	1420	very strong solvent	630 Melrose Ave. W.	S	190	20	-7	86	zinc
2/15/2011	1323	solvent	630 Melrose Ave. W.	S	190	32	2	85	zinc
2/15/2011	1010	odour	708 Melrose Ave. W.	S	190	33	0	88	zinc
2/15/2011	918	odour	535 Pandora Ave. W.	S	190	33	0	88	zinc
3/11/2011	825	solvent	630 Melrose Ave. W.	SSW	210	11	-14	82	zinc
3/16/2011	1039	solvent	630 Melrose Ave. W.	ESE	120	22	1	87	finish paint
4/6/2011	1427	solvent	630 Melrose Ave. W.	ESE	120	20	4	75	finish paint
4/6/2011	1825	solvent	630 Melrose Ave. W.	ESE	130	19	3	90	finish paint
4/19/2011	1835	solvent	630 Melrose Ave. W.	W	270	9	6	40	zinc
4/29/2011	1550	solvent	630 Melrose Ave. W.	SE	160	37	22	29	finish paint
5/6/2011	1230	solvent	630 Melrose Ave. W.	SE	140	18	18	35	finish paint
5/19/2011	1447	solvent	630 Melrose Ave. W.	SSW	210	6	22	44	zinc
4/29/2011	925	odour	708 Melrose Ave. W.	S	180	37	16	46	zinc
5/3/2011	730	odour	708 Melrose Ave. W.	S	190	28	5	61	zinc
5/16/2011	1430-1530	odour	708 Melrose Ave. W.	SE	150	30	22	26	finish paint
5/26/2011	1430	strong solvent	630 Melrose Ave. W.	SE	150	11	16	29	finish paint
5/31/2011	1035	solvent	630 Melrose Ave. W.	SSW	200	40	15	80	zinc
6/16/2011	1435	solvent	630 Melrose Ave. W.	SE	140	7	24	53	finish paint
6/17/2011	1437	solvent	630 Melrose Ave. W.	SE	150	30	24	55	finish paint
7/14/2011	1311	solvent	630 Melrose Ave. W.	S	170	24	26	57	zinc
7/18/2011	1920	solvent	700 Block of Melrose	SSW	200	7	31	41	zinc
7/19/2011	950	solvent	630 Melrose Ave. W.	S	170	15	30	62	zinc
7/20/2011	1420	solvent	630 Melrose Ave. W.	SSW	200	19	30	65	zinc
7/20/2011	1450	much stronger solvent	630 Melrose Ave. W.	WSW	250	20	31	63	zinc
8/3/2011	1403	solvent	630 Melrose Ave. W.	SSW	210	33	29	44	zinc
8/3/2011	1412	strong solvent	630 Melrose Ave. W.	SSW	210	33	29	44	zinc
8/18/2011	959	solvent	630 Melrose Ave. W.	SE	140	11	27	36	finish paint
8/22/2011	1022	solvent	630 Melrose Ave. W.	SSW	200	26	26	56	zinc
8/22/2011	1355	solvent	630 Melrose Ave. W.	SSW	200	37	33	35	zinc

9/2/2011	1450	solvent	630 Melrose Ave. W.	WSW	240	13	23	36	zinc
9/14/2011	1045	solvent	630 Melrose Ave. W.	NNW	340	24	9	61	?
9/19/2011	1445	solvent	630 Melrose Ave. W.	WSW	230	7	23	31	zinc
9/22/2011	1354	solvent	630 Melrose Ave. W.	SSW	200	13	13	55	zinc
9/27/2011	1015	solvent	630 Melrose Ave. W.						
7/26/2011	930-950	odour	708 Melrose Ave. W.	S	190	19	24	52	zinc
8/15/2011	930	odour	708 Melrose Ave. W.	ESE	130	16	24	65	finish paint
9/15/2011	935	odour	708 Melrose Ave. W.	S	190	11	12	48	zinc
9/22/2011	1440	odour	708 Melrose Ave. W.	SSW	210	11	13	51	zinc
6/28/2011	1040	chemical smell	Brewster & Plessis	S	180	15	18	50	finish paint
8/25/2011	815	fiberglass smell	400 Block Yale Ave.	SSW	200	12	18	68	? Not NF
9/7/2011	815	acrid smell - fiberglass?	Yale & Hoka	S	180	4	18	85	? Not NF
9/8/2011	1030	heavy manure odour	711 Brewster Street	W	280	15	27	42	? Not NF
9/15/2011	835	acrid odour - fiberglass?	Hoka & Ravelstone	SSW	210	10	8	65	? Not NF
9/15/2011	900	acrid odour - fiberglass?	Hoka & Kildare	SSW	210	7	8	65	? Not NF
10/4/2011	1723	solvent	630 Melrose Ave. W.	ESE	140	20	24.4	40	finish paint
10/7/2011	1832	solvent	630 Melrose Ave. W.	SSW	200	63	19.4	37	zinc
10/24/2011	1500	solvent	630 Melrose Ave. W.	S	170	56	10.7	54	finish paint
11/23/2011	1420	solvent - strong	630 Melrose Ave. W.	SSW	210	15	6.6	70	zinc
11/28/2011	1912	solvent - very strong	630 Melrose Ave. W.	WNW	300	15	-4.2	72	? Not NF
10/31/2011	1000	odour	708 Melrose Ave. W.	S	170	24	3.4	81	zinc
10/31/2011	910	fiberglass smell	Hoka & Ravelstone	S	170	19	1.9	87	? Not NF
11/4/2011	920	acrid chemical odour	Hoka & Ravelstone	S	180	41	4.4	44	? Not NF
11/21/2011	910	fiberglass smell	Hoka & Ravelstone	S	180	11	-16.3	98	? Not NF
11/23/2011	900	fiberglass smell	Regent & Moroz	S	180	11	-16.3	98	? Not NF
11/29/2011	1410	solvent odour	Regent & Moroz	S	190	33	-0.2	69	finish paint
12/5/2011	1457	solvent	630 Melrose Ave. W.	S	180	7	-8.6	67	zinc
2/3/2012	1035	solvent	630 Melrose Ave. W.	S	180	7	-14.5	92	zinc
2/28/2012	1400	odour	708 Melrose Ave. W.	NNW	10	9	-6.6	70	? Not NF
12/13/2011	1025	fiberglass smell	Hoka & Rosseau	S	180	13	-7.7	95	? Not NF
12/14/2011	1015	pungent chemical smell	Regent & Bismark	SSW	200	15	-2.4	96	finish paint
1/24/2012	1135	fiberglass smell	Regent & Hoka	S	180	26	-11.1	76	? Not NF
1/25/2012	1150	fiberglass smell	400 block Rousseau	S	180	50	-3	91	? Not NF
2/13/2012	1430	pungent chemical smell	Regent & Moroz	S	170	19	-2.5	65	finish paint
3/15/2012	1445	chemical smell	Regent & Moroz	S	180	32	13.9	48	finish paint
4/5/2012	1045	fiberglass smell	400 bloc Rousseau	SSE	160	24	13.7	33	? Not NF
4/26/2012	1315	unknown unpleasant odour	711 Brewster Street	ENE	60	17	7.8	39	? Not NF

4/27/2012	1230	fiberglass smell	Regent & Plessis	ESE	120	22	11.4	32	? Not Nf
4/12/2012	1800	very strong solvent	630 Melrose Ave. W.	SSE	150	26	16.1	20	finish paint
4/23/2012	1650	fiberglass smell	630 Melrose Ave. W.	SSE	140	30	20.3	29	? Not Nf
5/4/2012	1210	solvent	630 Melrose Ave. W.	ESE	120	20	11.8	63	finish paint
5/9/2012	935	solvent	630 Melrose Ave. W.	SSW	220	19	15.6	50	zinc
5/9/2012	1100	solvent	630 Melrose Ave. W.	SSW	220	22	17.4	41	zinc
5/10/2012	1035	solvent	630 Melrose Ave. W.	S	190	39	20.8	46	zinc
5/14/2012	1115	solvent	630 Melrose Ave. W.	SSW	200	22	24.1	32	zinc
5/16/2012	1820	solvent	630 Melrose Ave. W.	SE	140	26	19.2	35	finish paint
4/4/2012	1030	odour	708 Melrose Ave. W.	S	170	13	11.1	27	zinc
4/5/2012	1000	odour	708 Melrose Ave. W.	S	170	24	11.8	36	zinc
5/9/2012	855	odour	708 Melrose Ave. W.	SW	220	19	15.6	50	zinc
6/14/2012	1015	solvent odour	Regent & Moroz	SSW	200	22	22.1	68	zinc
8/10/2012	945	paint odour	Regent & Moroz	S	170	19	19.8	68	finish paint
9/10/2012	830	fiberglass odour	Yale b/w Brewster/Hoka	S	180	30	15.7	55	? Not Nf
9/14/2012	900	heavy fiberglass odour	Kildare & Hoka	S	170	9	12	60	? Not Nf
6/26/2012	930	odour	708 Melrose Ave. W.	S	170	26	21	70	zinc
7/10/2012	1400	odour	708 Melrose Ave. W.	S	190	6	30.1	37	zinc
7/28/2012	802	odour	708 Melrose Ave. W.	SSW	210	17	20.5	66	zinc
8/20/2012	620	odour	708 Melrose Ave. W.	STILL	0	0	6.7	93	zinc
8/24/2012	844	odour	708 Melrose Ave. W.	SSW	200	13	20.9	90	zinc
5/29/2012	1400	solvent	630 Melrose Ave. W.	NW	310	4	10	78	? Not Nf
5/30/2012	1025	solvent	630 Melrose Ave. W.	N	350	4	11.5	57	? Not Nf
5/30/2012	1345	solvent	630 Melrose Ave. W.	NNW	340	6	15	52	? Not Nf
6/1/2012	1355	very strong solvent	630 Melrose Ave. W.	SW	230	19	19	62	zinc
7/10/2012	1837	very strong solvent	630 Melrose Ave. W.	S	190	6	30.1	37	zinc
8/10/2012	1418	solvent	630 Melrose Ave. W.	S	190	28	25.8	44	zinc
8/14/2012	1310	solvent	630 Melrose Ave. W.	S	170	9	23.8	46	finish paint
8/14/2012	1800	solvent	630 Melrose Ave. W.	S	170	11	23.7	46	finish paint
8/31/2012	1258	strong solvent	630 Melrose Ave. W.	WSW	250	20	30.3	25	zinc
8/31/2012	1828	solvent	630 Melrose Ave. W.	WSW	240	6	29.1	25	zinc
9/14/2012	1600	solvent	630 Melrose Ave. W.	S	190	22	21.2	28	zinc
9/14/2012	1632	very strong solvent	630 Melrose Ave. W.	S	190	22	20.5	29	zinc
9/14/2012	1650	solvent	630 Melrose Ave. W.	S	190	22	20.5	29	zinc
9/28/2012	1035	solvent	630 Melrose Ave. W.	S	170	20	18.5	42	finish paint
10/23/2012	1045	solvent	630 Melrose Ave. W.	ESE	110	26	7	100	finish paint
10/15/2012	940	odour	708 Melrose Ave. W.	S	170	28	8	78	zinc

9/26/2012	915	acrid fiberglass odour	Revelstone & rewster	SSW	210	6	6.7	88	? Not NF
11/5/2012	830	fiberglass odour	Yale & Hoka	WNW	300	9	-12.8	87	? Not NF
11/16/2012	845	fiberglass odour	Hoka	S	180	39	-4.5	78	? Not NF
11/16/2012	900	chemical odour	529 Regent Ave. W.	S	180	39	-4.5	78	? Not NF
11/20/2012	815	fiberglass odour	Rousseau & Hoka	S	170	32	-0.3	81	? Not NF
11/27/2012	930	fiberglass odour	Winona & Harvard	WNW	300	7	-17.4	93	? Not NF
11/27/2012	945	chemical odour (paint)	Brewster & Hoka	WNW	300	7	-17.4	93	? Not NF
12/20/2012	1000	undefinable foul stench	Moroz & Brewster	W	270	6	-12.2	92	? Not NF
1/3/2013	1035	faint chemical odour	Extra foods on Brewster	S	190	28	-13.2	84	finish paint
1/10/2013	1000	chemical odour	Regent & Bismakr	S	180	19	-1.6	86	finish paint
1/10/2013	1025	chemical odour	711 Brewster Street	S	180	33	-0.6	84	finish paint
1/28/2013	1200	fiberglass odour	Regent & Hoka						? Not NF
2/8/2013	1030	fiberglass odour	Westview School South						? Not NF
2/25/2013	1010	pungent chemical smell	Victoria & Hoka						
2/25/2013	1025	chemical odour	Regent (Moroz to Plesis)						
2/26/2013	1045	Strong fiberglass odour	Victoria & Hoka						? Not NF

New Flyer Winnipeg
Odour Episode Monitoring

717
Rosseau Ave W

Ravelston Ave W

Brewster St.

Moroz St.

Plessis Rd.

Hoka St.

Regent Ave W

Bismark St.

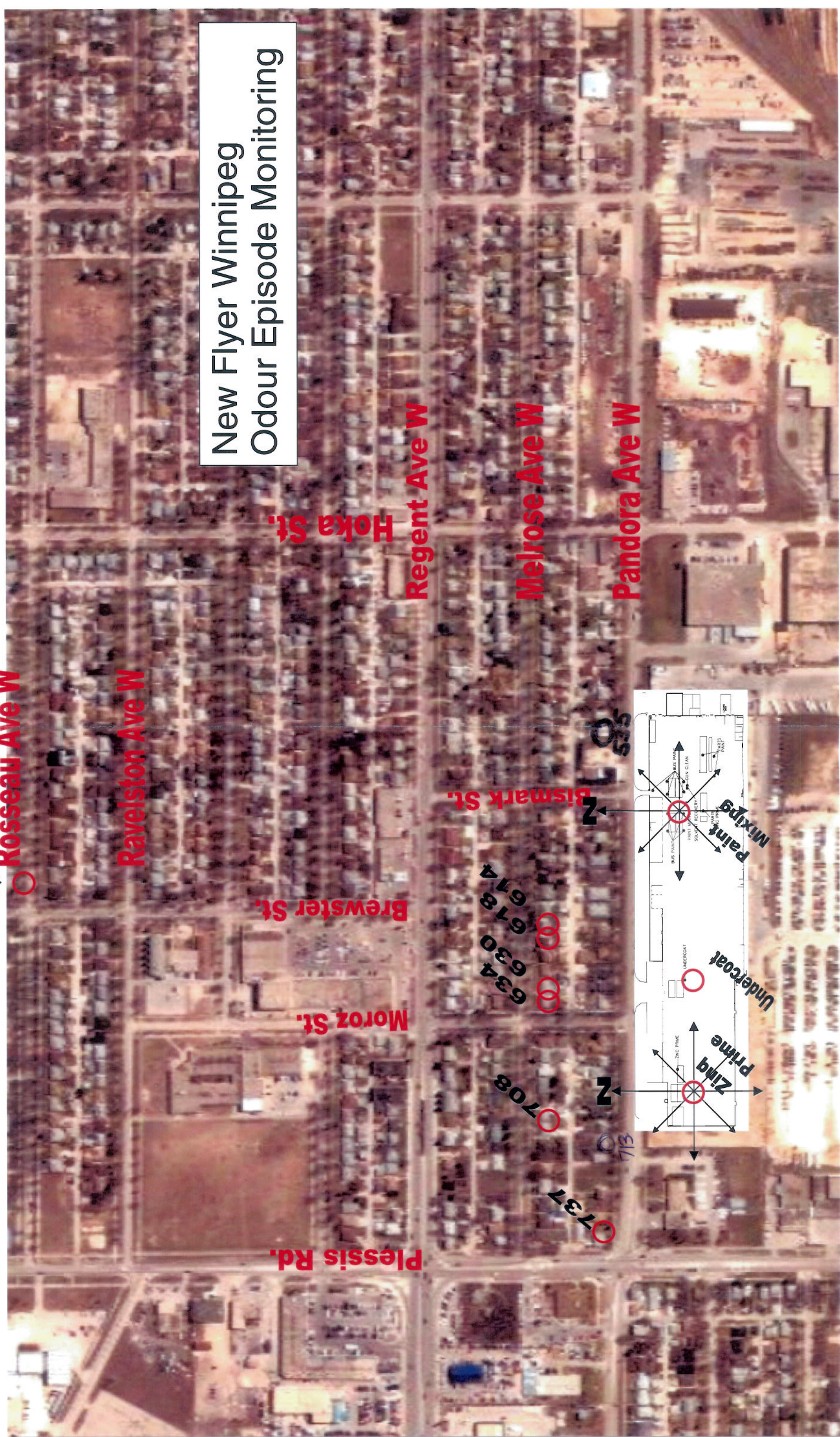
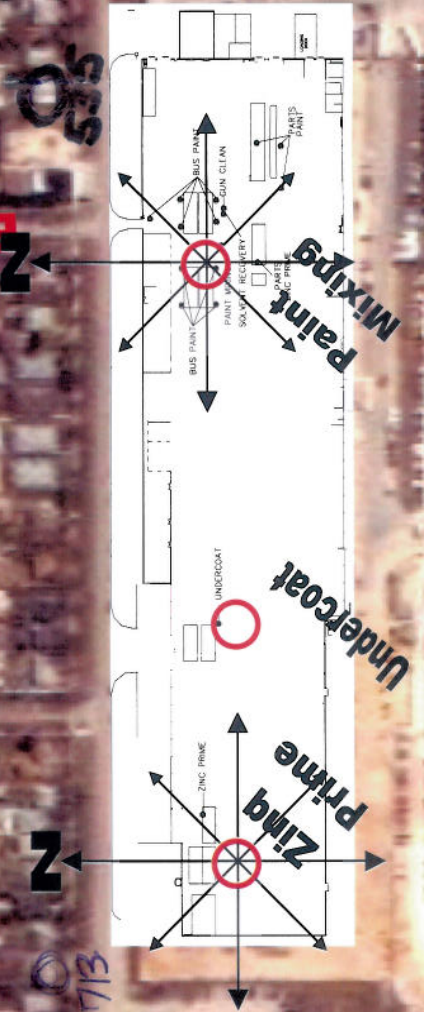
634
630
618
614

708

737

Melrose Ave W

Pandora Ave W



Eshetu Beshada
Environmental Engineer
Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
160 - 123 Main Street,
Winnipeg, MB R3C 1A5

Dear Sir:

**RE: Environmental Assessment – File no. 5594.00
Structural Composite Technologies Ltd. Proposal**

Please accept this letter and related attachment as my response to the Structural Composite Technologies Ltd. (SCT) proposal, notice of which was published May 10, 2014. My submission may be made available to the proponent and placed on the public registry, but I request that specific details (i.e. my name, address and email address) not be available to the public, either at a physical location or on the website (electronically).

In respect to the air dispersion modelling and point of impingement compliance assessment report prepared by Pinchin Environmental Ltd.:

- The table for Worst-Case MSDS Material Blend for various contaminants states that the maximum emission is deemed insignificant or a number is stated. How does this reconcile with the fibreglass odour events log (see attachment 1) I have maintained since 2011? Are these events merely nuisance odours which the community is expected to endure or are there also related adverse health effects from this exposure?
- The report notes that “the surrounding area is predominately rural; therefore the ‘RURAL’ dispersion factor was chosen”. The setting is actually urban, with industry located to the east and west of SCT on the south side of Pandora Avenue, with substantial residential/business development on the north side Pandora Avenue, extending to the east and west as well. Why was this factor chosen?
- Why was meteorological data used from the Bismark, North Dakota weather station? Weather patterns in Bismark, though not a long distance away, can vary significantly from those in Winnipeg and environs.
- The report notes, on several occasions, that resulting emission rates were multiplied by 12/24 to convert to a 24h averaging period, since the plant only operates for 12 hours. Doesn't this conversion dilute the resulting average?
- Emissions from resin spraying are vented through 1 of 4 general production exhausts, which are equipped with filters. Filter efficiency is estimated to be 20 – 30%. What happens to the rest of the 70 to 80% of emissions?
- Styrene levels are monitored in the plant (section 5.2 – Monitoring and Reporting). What about the levels emitted to the outside?
- The modelling includes anticipated emission levels for styrene, methanol, hydrogen peroxide, methyl ethyl ketone and particulate matter. How much of each is being released and what are the health risks associated with these emissions? What are the

exposure limits to humans, especially in view of the fact that styrene is a possible human carcinogen?

- It states that polyvinyl alcohol (PVA) is used as a mold release agent that causes odours, and acetone is used for testing and clean up. Why were these not included in the dispersion model? Does the acetone used by SCT contain benzene, which is known to cause birth defects or other reproductive harm?
- Sanding and cutting parts cause dust particles, which can become airborne. How this particulate filtered and what is the total quantity emitted to the outside air?
- Table A3 – Emission Summary Table provides an overview of specific emissions from the plant, the details of which are too difficult for a non-technical person to understand. Specifically, what are the levels of emissions and what are the adverse health effects of each of these contaminants?

It is my expectation that, if Manitoba Conservation grants an environmental Licence to Structural Composite Technologies Ltd., the following factors will be considered and/or included in the license:

- ambient air testing (not merely modelling) be performed for particulate matter and odours in any air emission and the significance for potential acute and chronic impacts to health or environment from exposure to concentrations of the compounds detected;
- specific limits be established for any and all air emissions and will include required sampling, analysis and reporting as required;
- set out standards for air pollution control equipment regarding operating and maintenance measures, air pollution control devices and that any emissions do not create a significant health or environmental impact; and
- implementation of any odour abatement modifications required within a specific period of time.

In conclusion, note that as an individual resident of this community, I am disadvantaged in my knowledge of the technical information presented in this proposal. However, I am familiar with the environmental impact that the operation of this facility has had to date (as noted in my fibreglass odour events log). I am hopeful that Manitoba Conservation will work with Structural Composite Technologies Ltd. to set out provisions in the licence to mitigate any health and environmental impact on our community. I also expect that the applicable regulations of the licence respecting dangerous goods, noise pollution, odour nuisance, particulate matter, particulate residue, pollutants, volatile organic compounds (VOCs), and wastewater are appropriate, that they will be implemented in a timely manner, that the licence is reviewed regularly, and that reporting requirements to Manitoba Conservation are included.

Thank you for the opportunity to provide my comments.

Yours truly,


Susan Zaikow

Attachment 1

Attachment 1

Date	Time	Fibreglass Odour Events Log
May 18, 2011	10:30 a.m.	605 Pandora Ave. (confirmed by MB Conservation)
October 31, 2011	9:10 a.m.	Ravelstone and Hoka
November 21, 2011	9:10 a.m.	Ravelstone and Hoka
November 23, 2011	9:00 a.m.	Regent and Madeline
December 13, 2011	10:25 a.m.	Hoka and Rousseau
January 24, 2012	11:35 a.m.	Regent and Hoka
January 25, 2012	11:50 a.m.	400 block of Rousseau Ave.
April 5, 2012	10:45 a.m.	400 block of Rousseau opposite Westview School
April 27, 2012	12:30 p.m.	Regent Ave. between Brewster and Plessis
September 10, 2012	8:30 a.m.	500 block of Yale Ave., between Brewster and Hoka
September 14, 2012	9:00 a.m.	Heavy fibreglass odour on Kildare Ave. between Cloverdale Cr. and Hoka St.
September 26, 2012	9:15 a.m.	Particularly acrid fibreglass odour along 500 block of Ravelstone, between Brewster and Hoka
November 5, 2012	8:30 a.m.	Along 400 block of Yale Ave. between Hoka and Madeline
November 16, 2012	8:45 a.m.	Along Hoka St. between Regent and Kildare
November 20, 2012	between 8:00 & 8:30 a.m.	Along Ravelstone and Rousseau Avenues, in the 500 block, mostly east toward Hoka St.
November 27, 2012	9:30 a.m.	NW corner of Winona and Harvard
January 28, 2013	12:00 p.m.	400 block of Regent between Hoka and Madeline
February 8, 2013	10:30 a.m.	Along the length of Westview School (south side)
February 26, 2013	10:45 a.m.	Particularly strong odour on south side of Victoria Ave. for the first 4 or 5 houses, east of Hoka
April 29, 2013	between 10:40 & 10:45 a.m.	Regent and Hoka
May 27, 2013	10:00 a.m.	Hoka and Rousseau
July 29, 2013	8:45 a.m.	Regent between Madeline and Hoka
August 15, 2013	8:15 a.m.	vicinity of Westview School
August 26, 2013	8:10 - 8:15 a.m.	first few houses on Yale Ave. off Brewster and first few houses on Victoria Ave. off Hoka, going west
September 5, 2013	8:10 a.m.	Regent and Hoka
September 10, 2013	8:15 a.m.	mid-block on Ravelstone, between Brewster and Hoka
October 8, 2013	7:45 – 8:00 a.m.	along Madeline between Kildare and Regent
October 16, 2013	7:50 a.m.	along Westview School between Hoka & Madeline
November 12, 2013	7:45 a.m.	Madeline & Ravelstone
November 27, 2013	8:00 a.m.	Regent and Hoka

(May 27, 2014)

Beshada, Eshetu (CWS)

From: Kelly, Jason (CWS)

Sent: June-10-14 2:18 PM

To: Beshada, Eshetu (CWS)

Subject: RE: Request for review/comment - File 5594.00 - Structural Composite Technologies EAP

Parks and Protected Spaces Branch has reviewed the proposal submitted pursuant of the *Environment Act* the Request for review/comment - File 5594.00 - Structural Composite Technologies EAP. The Branch has no comments or concerns to offer as it does not affect any provincial parks, park reserves, ecological reserves, areas of special interest, or proposed protected areas.

Jason Kelly, M.N.R.M.

Ecological Reserves and Protected Areas Specialist

Parks and Protected Spaces Branch

Conservation and Water Stewardship

Box 53, 200 Saulteaux Cres

Winnipeg, MB R3J 3W3

Phone: 204-945-4148

Cell:

Fax: 204-945-0012

Email: Jason.Kelly@gov.mb.ca

Beshada, Eshetu (CWS)

From: Kaita, Adara (CWS) on behalf of +WPG1212 - Conservation_Circulars (CWS)
Sent: June-09-14 11:27 AM
To: Beshada, Eshetu (CWS)
Subject: EA Proposal - Structural Composite Technologies - Fibreglass Reinforced Plastic Products Manufacturing Facility - File 5594.00

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Eshetu,

The Lands Branch has no concerns as no Crown lands are impacted by the proposal.

Thank you for the opportunity to review.

Adara Kaita
Crown Land Programs and Policy Manager
Lands Branch | Conservation and Water Stewardship
Box 25, 200 Saulteaux Crescent | Winnipeg, MB R3J 3W3
Cell: (204) 945-6301 | F: (204) 948-2197

DATE: 09 June 2014

TO: Eshetu Beshada
Environmental Approvals
Conservation and Water
Stewardship
160-123 Main Street, Winnipeg

FROM: Muntaseer Ibn Azkar
Air Quality–Environmental Programs
& Strategies
Conservation and Water Stewardship
1007 Century Street, Winnipeg

**SUBJECT: Structural Composite Technologies Ltd. – Fiberglass Reinforced Plastic
Products Manufacturing Facility (File 5594.00)**

Air Quality Section has reviewed the above proposal and provides the following comments:

- There was no mention of size fraction of particulate matter used in the modeling work. There are three size fractions of particulate matter (PM_{2.5}, PM₁₀, and SPM) listed in the Manitoba Ambient Air Quality Criteria (MAAQC).
- Modeling results submitted is in tabular format and no contour plot is provided. It is suggested that contour plots be included as it is an effective assessment tool regarding emission dispersion in the plant's area of influence.
- Multi-Chemical Utility of AERMOD model may give more authentic concentration of each pollutant rather than using base emission rate of 1 g/s. Multi-Chemical Utility allow to specify multiple pollutant emissions from different sources with varied emission rates.
- There was no mention in the submitted proposal on the year of meteorological data used in the modeling work.

Beshada, Eshetu (CWS)

From: Stibbard, James (CWS)
Sent: June-06-14 9:33 AM
To: Beshada, Eshetu (CWS)
Subject: Re: 5594.00 Structural Components Fiberglass EAP

Follow Up Flag: Follow up
Flag Status: Flagged

Dr. Beshada,

I reviewed the above noted EAP. Office of Drinking Water has no concerns respecting drinking water quality or safety with this EAP.

If you have any questions, please call.

Regards,

James Stibbard P. Eng.

Approvals Engineer
Office of Drinking Water
1007 Century Street
Winnipeg MB R3H 0W4
phone: (204) 945-5949
fax: (204) 945-1365
email: James.Stibbard@gov.mb.ca
website: www.manitoba.ca/drinkingwater

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Beshada, Eshetu (CWS)

From: Jacobs, Kevin (CWS)

Sent: May-23-14 12:07 PM

To: Beshada, Eshetu (CWS)

Subject: RE: Request for review/comment - File 5594.00 - Structural Composite Technologies EAP

Hello Eshetu,

On behalf of the water quality management section of Manitoba Conservation and Water Stewardship I reviewed the proposal submitted by Structural Composite Technologies for a license pursuant to the Environment Act for a manufacturing plant. Given that no discharge to surface waters are expected with the proposal, I have no comments at this time.

Thank you for the opportunity to provide comments on this proposal.

Kevin Jacobs, M.Sc.

Senior Water Protection Officer

Water Science and Management Branch

Manitoba Conservation and Water Stewardship

123 Main Street Winnipeg, Manitoba R3C 1A5

Phone: 204 945 4304

Fax: 204 948 2357

DATE: May 23, 2014

TO: Eshetu Beshada
Environmental Approvals
Conservation and Water Stewardship
123 Main St Suite 160 (Box 80)
Winnipeg MB R3C 1A5

FROM: Environmental Compliance and Enforcement
Conservation and Water Stewardship
123 Main St Suite 160 (Box 60)
Winnipeg MB R3C 1A5

**SUBJECT: Environment Act Proposal – Structural Composite Technologies Ltd (Client File:
5594.00)**

Environmental Compliance and Enforcement (Central Region) has reviewed the above noted Environment Act Proposal (EAP). Please find the following comments regarding the proposal.

1) Regarding Odour Emissions and Control:

This facility operates in close proximity to a residential neighbourhood. We request further information regarding how the proponent proposes to reduce the odour emissions in the neighbouring community.

Beshada, Eshetu (CWS)

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

From: Boissonneault, Caroline (CWS)

Sent: May-20-14 10:16 AM

To: Beshada, Eshetu (CWS)

Subject: Emailing: Request for reviewcomment - File 5594.00 - Structural Composite Technologies EAP

Hello,

Wildlife Branch has reviewed the proposal and has no comments.

Thank you.

Caroline Boissonneault

Conservation and Water Stewardship

Wildlife Branch

Tel.: 204-945-6810

Caroline.boissonneault@gov.mb.ca

Your message is ready to be sent with the following file or link attachments:

Request for reviewcomment - File 5594.00 - Structural Composite Technologies EAP

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Beshada, Eshetu (CWS)

From: Roberts, Dan (CWS)
Sent: May-12-14 9:18 AM
To: Beshada, Eshetu (CWS)
Subject: Request for review/comment - File 5594.00 - Structural Composite Technologies EAP

Follow Up Flag: Follow up
Flag Status: Flagged

On behalf of the *Water Control Works and Drainage Licensing Section*, there are no concerns.

Dan Roberts

Water Resource Officer
Water Control Works and Drainage Licensing Section
Conservation and Water Stewardship
Box 640, 201 Fourth Ave. S., Swan River, MB R0L 1Z0
Cell: (204) 281-2122, Fax: 734-3733

Beshada, Eshetu (CWS)

From: Sobkowich, Dale (CWS)

Sent: May-09-14 2:28 PM

To: Beshada, Eshetu (CWS)

Subject: RE: Request for review/comment - File 5594.00 - Structural Composite Technologies EAP

Land Management & Planning Section has no comment.

Dale Sobkowich

Lands Branch, Manitoba Conservation & Water Stewardship



Infrastructure and Transportation

Highway Planning and Design Branch
Environmental Services Section
1420 - 215 Garry St., Winnipeg, MB R3C 3P3
T (204) 619-4359 F (204) 945-0593

May 9, 2014

Tracey Braun, M. Sc.
Director, Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
123 Main St., Suite 160
Winnipeg, MB R3C 1A5

RE: Structural Composite Technologies Ltd.
Fiberglass Reinforced Plastic Products Manufacturing Facility
Client File No. 5594.00

Dear Ms. Braun:

MIT has reviewed the proposal under the Environment Act noted above and we do not have any concern.

Thank you very much for providing us the opportunity to review the proposal.

Sincerely,

Ryan Coulter, M. Sc., P. Eng.
Manager of Environmental Services