

Subject: Reference to Bowater in the Report on Children's Health.

After reviewing the CEC report on children's Health, with reference to 'suspected neurotoxins' from the Bowater mill in Thunder Bay we compiled the emissions from 2000 along with the current level and projected reductions to be achieved by the end of 2004. These are all the same numbers as are reported to the NPRI.

2000

1730 tonnes reported under NPRI... don't know where CEC got 1757 tonnes

1412 t Methanol discharged to air

276 t Chlorine discharged to air

42 t Zinc; of which 2.5 to air/2.5 to water/37 to landfill

At the time we were not required to report Manganese or Lead.

2001

1769 tonnes reported under NPRI (3% increase....due to additional compounds)

1235 t Methanol to air (13% reduction)

245 t Chlorine to air (12% reduction)

41 t Zinc of which 2.2 to air/2.2 to water/37 to landfill

248 t Manganese to landfill

2002

1592 tonnes reported under NPRI (12 % decrease)

1271 t Methanol to air

22 t Chlorine to air (90% reduction - due to new scrubbers)

59 t Zinc of which 2.2 to air/2.3 to water/54 to landfill

240 t Manganese to landfill

0.8 t Lead to landfill

0.4 t Arsenic to landfill

2003

1260 tonnes reported under NPRI (21% decrease)

910 t Methanol to air (28% reduction - due to new low odour recovery boiler)

20 t Chlorine to air (13% reduction)

66 t Zinc of which 2 to air/2.2 to water/62 to landfill

263 t Manganese to landfill

0.8 t Lead to landfill

0.4 t Arsenic to landfill

2004

Projected NPRI reporting will be around 600 tonnes....which is about a

70% reduction from 2000. This will mainly be related to the

installation of a Dilute Non-condensable Gas collection and incineration system.

The emissions above are all well within the Ontario Ministry of the Environment, Regulation 346 limits. In fact methanol is only about 1% of the maximum ground level concentration allowed under that Regulation. The CEC Report makes it look like Bowater is grossly damaging the health of children in Thunder Bay. I am not aware of any report that suggests that to be the case. I believe the CEC Report to be very alarmist and expect that it will cause many parents undue concern.

On behalf of Bowater I am requesting that the CEC provide us with the scientific reports and rationale that establish that methanol in air emissions will act as a neurotoxin at the levels found in air near Canadian pulp mills. As someone who has spent more than 25 years as a regulator specializing in the pulp and paper industry, and recently four years working within this industry, I have never heard any suggestion that methanol in air emissions can be a neurotoxin to children. Should this be the case, it would be up to governments to establish emission limits that would ensure the protection of children. In my experience the pulp and paper industry would react quickly should any such link be established. I do believe it is unfair of the CEC to raise this issue through this report using terms such as "suspected neurotoxin". It is also unfair to release a report such as this based on four year old data. I would request that the report include the above Bowater data, that is available to anyone on the NPRI database, to reflect the current situation.

I look forward to your response.

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