

July 29, 2009

**RE: LOUISIANA PACIFIC'S (L-P) PETITION TO THE MANITOBA GOVERNMENT TO BE ALLOWED TO DISCONTINUE USE OF REGENERATIVE THERMAL OXIDIZER (RTO) POLLUTION CONTROL DEVICES IN ITS ORIENTED STRAND BOARD (OSB) PLANT NEAR SWAN RIVER MB**

Dear Sir or Madam:

I understand that you are faced with a difficult decision with competing outcomes: toxic waste, greenhouse gas (GHG) emissions, or possible job loss. But I do not think that the only choice here is to either reduce GHG emissions or to dump massive amounts of toxic chemicals into the environment in order to save jobs. I don't think that it is a good idea to try to prevent dire consequences in one way (i.e. reducing GHG) by bringing about other dire consequences in another way (i.e. releasing toxic chemicals).

First of all, we need to agree and accept what objectives are most important to us and to focus upon them. I believe that our most important objective as inhabitants of the closed system that is the Earth must be to stop poisoning our planet in ALL ways. Our efforts must not be to replace one set of toxins with another but to focus our efforts and invest our money and creativity into ensuring that the only allowable output from any human activity are of a substance and quantity that are inputs to other processes. This is the way nature has achieved balance and sustainability.

I understand that L-P wishes to contribute to GHG reduction by shutting down the RTO. L-P claims this will reduce the combustion of natural gas and reduce GHG emissions by about 11,830 tonnes of carbon dioxide equivalents per year (Winnipeg Free Press, Mar 10, 2009). Emissions from stationary combustion sources in Manitoba's manufacturing sector were 1,330,000 tonnes in 2007. Therefore, 11,830 tonnes would represent 0.89% of all stationary combustion sources in Manitoba's manufacturing sector in that year.

This is a significant amount but let's put it into perspective. It would be just 0.06% of all of Manitoba's GHG emissions from that year. Manitoba needs to reduce our GHG emissions by 26% of our 2007 level, or **433 times the amount of the proposed L-P reduction**, if we are to reach our Kyoto target. Clearly this is not the solution.

I understand that the RTO was installed to deal with the tons of toxic pollutants being emitted, such as benzene, Volatile Organic Compounds (VOCs), phenols, formaldehyde, hydrogen cyanide and Methylene Diphenyl Isocyanate (MDI). I also understand that

many of these compounds are known carcinogens and pose serious health risks to anyone who may be exposed to them.

In my mind, L-P's **primary responsibility** is to prevent the release of any of the above named chemicals into the environment. L-P's **challenge** is to discover ways to prevent the production of these compounds while expending a minimum amount of fossil fuels. For example, how about changes to the process or product to reduce the production of these compounds in the first place? Or, how about using waste process heat or biomass for RTO fuel?

Don't get me wrong. I am a firm believer that we must work diligently to reduce our GHG emissions as much as possible as soon as possible. I believe this because I want to prevent dire consequences for ourselves and coming generations due to climate change.

However, replacing climate change with toxic poisoning is hardly a worthwhile exchange.

Sincerely,

Curtis Hull, PEng  
Project Manager