

**Dianne Bravo**

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**From:** Michael Taniguchi <mtaniguc@apotex.com>  
**Sent:** May-15-15 3:50 PM  
**To:** Dianne Bravo  
**Cc:** Mae (Rigmea) Lee  
**Subject:** RE: Proposed Sewers Bylaw Changed - Information Updates

Hi Dianne,

Thank you for sending along this information and for including us in some of the stakeholders meetings. At the last meeting, you and your colleagues had asked for any additional input to be sent via email. I had a few additional comments that I wanted to make.

We are in full support of including thresholds that would require a P2 plan to be created (instead of the current system where any amount of a subject pollutant would require the creation of a plan. During the creation of our 2014 P2 plans, we had to create plans for 2 of our facilities and 5 subject pollutants at each one. Some of the levels of these materials were 1.7 to 3.1% of the threshold. We have 7 buildings within Toronto that could warrant the creation of a plan. Therefore, by including trace amounts such as these, we are required to spend the time and effort to identify, document and investigate these. Typically, since they are in such trace amounts, the source is very difficult to identify and if we have identified it, there is usually nothing that can be done. Or it is difficult to justify the costs of changing a process since we are only emitting a trace amount.

Another issue we have with the current system is that the current P2 limits are based on the ability of the lab to detect the material. As long as the detection methods get better, the threshold will continue to get lower and lower. This represents a moving target and is not fair for industry.

Finally, to address some of the concerns that were raised by the environmental groups, creating a 25% threshold for the P2 plans should not have a significant impact on the environment. This threshold is still below the by-law limits of what can be disposed into the city sewer system. The P2 plans are still a proactive measure to force companies to evaluate any materials being released into the sewers that are approaching the limit and to address these before they can have a negative environmental impact.

I hope that this makes sense. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

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