WINPAK

100 Saulteaux Crescent
Winnipeg MB R3J 3T3
Canada

US Mailing Address:
PO Box 14748
Minneapolis MN 55414
USA

Tel. 204-889-1015
Fax 204-832-7781

October 25, 2018

Ms. Tracy Braun
Director, Environmental Approvals
Manitoba Conservation
Suite 160, 123 Main Street, Box 80
Winnipeg, MB R3C 1A5

Dear Ms. Braun:

RE: NOTICE OF ALTERATION APPLICATION - WINPAK LTD.

We are providing a Notice of Alteration pursuant to Section 14(1) of the Environment Act (The Act). Winpak was granted Licence No. 2797 on December 17, 2007 for their packaging manufacturing plant located in Murray Industrial Park in Winnipeg.

The Environment Act states that a notice of alteration must be filed where a proponent:

> "(b) has received an environmental licence for a development;
>
> and the proponent intends to alter that proposal or the development as licensed that does not conform to the limits, terms and conditions or that is likely to change the environmental effect, the proponent shall notify the director or the minister, as the case may be, of the proposed alteration before proceeding with it."

It is our interpretation of The Act that a notice of alteration must be filed if the proponent makes alterations that will result in a change to its emissions to the environment. The proposed changes outlined below could result in new emissions. It is our belief however that the changes are minor in nature and will be neutral or in fact may be beneficial in terms of environmental emissions.

Recent Changes to Winpak Processes

1. Since the last "Notice of Alteration" dated October 4, 2017, Winpak has slightly rearranged the equipment layout within the facility. We are providing a revised plant layout dated October 2, 2018. There is no change to the building footprint itself.
2. We have added one new slitter (slitter # 22). This machine does not emit any VOC's to the environment. This was a replacement slitter as we have removed slitter # 9 from service.

Proposed Alteration with Minimal Emissions

1. The change proposed to the printing department area involves the addition of a solvent recycling system and a parts washer. These will be installed in a separate room in the last quarter of 2018.
2. The solvent recycling system is a Daetwyler Distillation Unit Type ROTO Max which will continuously distill the waste clean-up solvent from two presses with the additional capacity to add solvent from other presses. This is an enclosed recovery system with a chiller water process. The will only create some minor VOC during the sludge draining from the kettle to the waste drum. The VOC value during draining is a few grams as per the supplier. This draining will be once per 24 hour day Monday to Friday.
3. The parts washer is a RENZMANN Washing Type 3400. This is a washing system with solvent cooling in the washing container for cooling the solvent heated by the washing pump to reduce evaporation of solvent. The supplier feedback is the VOC will be 3 – 4 kilos per washing cycle. The expected wash cycle will be once per 24 hour day to start. The max wash cycles will be once per 8 hour shift Monday to Friday. This is to replace/eliminate the solvent soaking tanks we are currently using in this department.

Future Changes to Winpak Processes

1. We are planning to add another automated packaging system to remove and package rolls from slitter # 10 and slitter # 22. The automated packaging will connect to our current automated packaging from the current slitter # 20. This machine does not emit any VOC's to the environment. This will take place in 2019.
2. We are planning to add a pouch zipper machine # 6 in 2019. This will be replacing pouch zipper machine # 2. This machine does not emit any VOC's to the environment.
3. We are planning to add a slitter # 23 and this will be replacing slitter # 10 in 2020. This machine does not emit any VOC's to the environment.

Summary

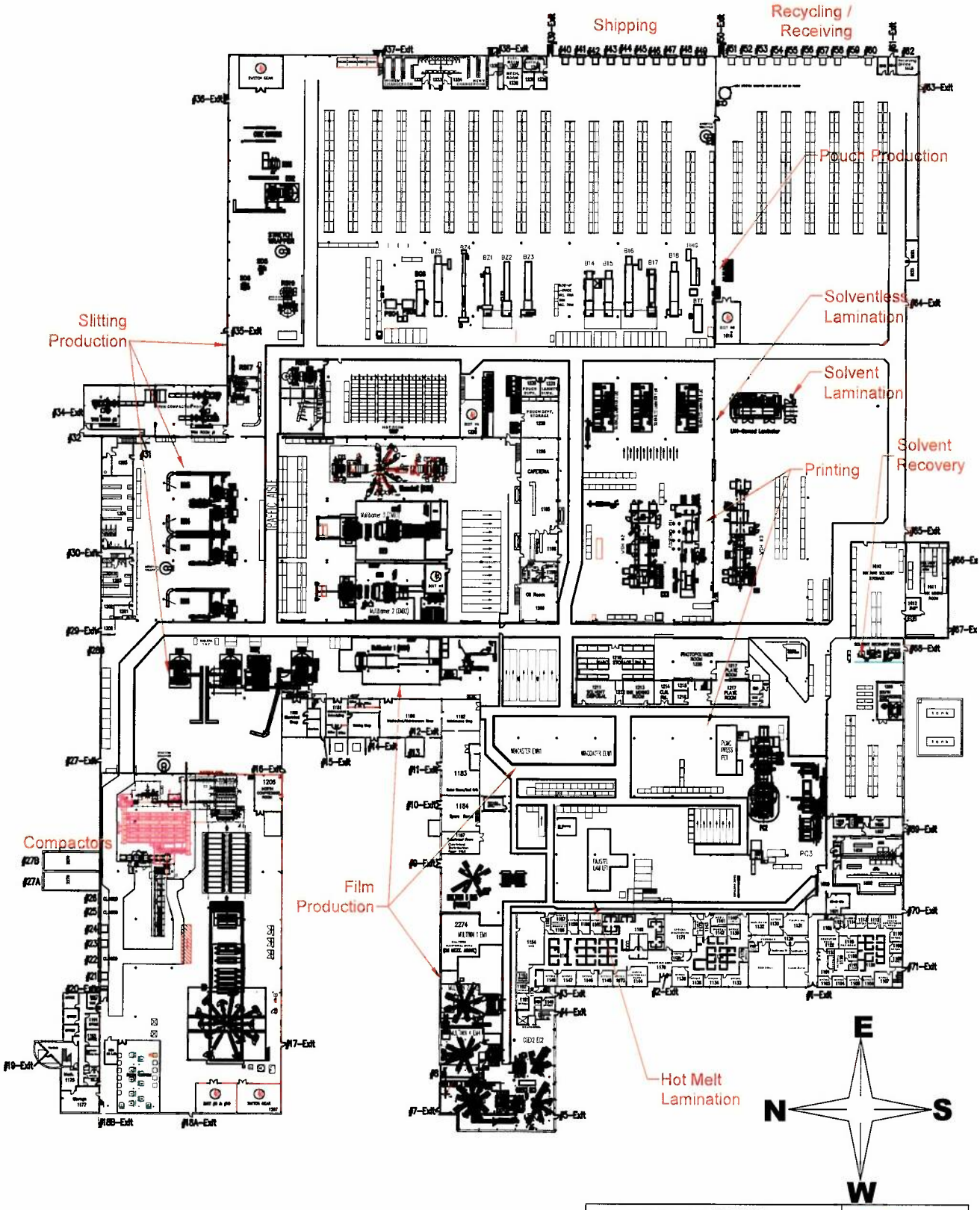
We believe that the foregoing alteration should be classified as a minor alteration as set out in Section 14(2) and request that you will give approval to the proponent to implement the alteration as planned.

Should you require any further information or clarification please contact the writer.

Yours truly,

Doug Halowski
Safety & Environmental Supervisor
Winpak Ltd.

Plant Layout-Environmental License



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Revision Date: October 2, 2018	Property of Winpak, Canada