

Environment Act Licence Loi sur l'environnement Licence

Manitoba
Environment
Environnement
Manitoba



Licence No./Licence n° 1278 RR
Issue Date/Date de délivrance July 12, 1989

Revised: **August 28, 1997**
January 11, 1999

**IN ACCORDANCE WITH THE MANITOBA ENVIRONMENT ACT (C.C.S.M. c. E125)
THIS LICENCE IS ISSUED PURSUANT TO SECTION 11(1) TO:**

TOLKO INDUSTRIES LTD.; "the Licencee"

The following limits, terms and conditions shall be complied with by Tolko Industries Inc., in connection with the operation of a sequencing batch reactor sewage treatment facility situated in the northeast quadrant of the Tolko pulp and paper mill site located 2.4 kilometres north of the Town of The Pas:

1. The Licencee shall, subject to Clause 2, direct all domestic and sanitary sewage, which is generated within the boundaries of the Tolko pulp and paper mill complex, to the sewage treatment facility.
2. The Licencee shall, subject to Clause 4 and excepting sludge disposal activities, discharge all sewage effluent only via the designated final discharge point.
3. The Licencee shall not discharge sewage effluent from the sewage treatment facility if its quality is such that:
 - (a) the five-day biochemical oxygen demand is in excess of 30 milligrams per litre; and/or
 - (b) the suspended solids content is in excess of 30 milligrams per litre;as determined from the analysis of any composite sample taken at the final discharge point of the said facility.
4. The Licencee shall, with regards to any emergency raw sewage discharge event, either at or preceding the said facility, immediately notify the Director of the event and circumstances, and arrange for and implement alternative measures for the proper disposal of the raw sewage if the malfunction cannot be corrected within 8 hours of discovering the event.
5. The Licencee shall not dispose of, or arrange for the contracted disposal of, any sludge from the sewage treatment facility to any location other than:
 - (a) to a licenced waste treatment facility, the operators of which are agreeable to accepting this waste substance; or
 - (b) an alternate location satisfactory to the Director.

6. The Licencee shall install and maintain a flow meter with a totalizer, either at the lift station or at the outfall of the sewage treatment facility, capable of measuring the flow rate to an accuracy within plus or minus five percent of the true flow rate.
7. The Licencee shall measure and record each month the total monthly volume of sewage pumped to, or discharged from, the sewage treatment facility.
8. The Licencee shall, subject to Clause 9, collect a composite sample of sewage effluent once every seven days from the final discharge point, and analyze each such sample for its five-day biochemical oxygen demand and suspended solids content.
9. The Licencee shall sample and analyze the sewage effluent at the final discharge point in such a manner, and for such additional pollutants and characteristics, and for such frequency and duration of time, as may otherwise be specified in writing by the Director.
10. The Licencee shall submit the data collected pursuant to Clauses 7, 8 and 9 to the Director, in a form satisfactory to the Director, within 30 days of the end of each month during which the samples and data were collected.
11. Licence No. 1121 is herewith rescinded.
12. In this Licence:
 - (a) "final discharge point" means the composite sampler chamber connected in parallel on the 4" diameter common treated effluent outfall line from the sequencing batch reactor(s), or the end-of-pipe of the 4" diameter common treated effluent outfall line, as indicated on Appendix 'A' to this Licence; and
 - (b) "composite sample" means a quantity of effluent composed of a minimum of three equal volumes of effluent collected at approximately equal time intervals during each decant stage over a sampling period of approximately 24 consecutive hours, or composed of equal volumes of effluent collected intermittently at equal time intervals over a sampling period of approximately 24 consecutive hours.



Larry Strachan, P. Eng.
Director
Environment Act



Environment

Environmental Management

123 Main Street, Suite 160
Winnipeg MB R3C 1A5
CANADA

Fax: (204) 945-5229

Internet: <http://www.gov.mb.ca/environ>

FAXED

CLIENT FILE NOS.: 213.30
3023.00
3094.50
3094.60

January 11, 1999

Mr. R. Ksiezopolski
Woodlands Manager
Tolko Industries Ltd.
PO Box 1590
The Pas MB R9A 1L5

Dear Mr. Ksiezopolski:

Enclosed you will find the following Revised Environment Act Licences issued in accordance with the Manitoba Environment Act to **Tolko Industries Ltd.:**

- **Licence No. 1278 RR** for the operation of a sequencing batch reactor sewage treatment facility situated in the northeast quadrant of the Tolko pulp and paper mill site located 2.4 kilometres north of The Town of The Pas;
- **Licence No. 1339 RR** for the existing 400 tonne per day Kraft Pulp Mill and the proposed 500 tonne per day Bleached Kraft Mill at The Pas; and
- **Licence No. 2302 E R** for the carrying out of forest management activities within the geographical boundaries of Forest Management Licence Area #02.

As per David C. Filmon's request in letter dated January 6, 1999 the necessary name change (Tolko Manitoba Inc. to Tolko Industries Ltd.) has been made to the above noted existing Licences.

Please note Environment Act Licence No. 1684 S5 R issued on December 20, 1996 and revised on August 28, 1997, had expired on January 1, 1998 and is no longer active and we have closed our file (Client File No. 3094.50) on this matter.

In addition to the enclosed Revised Licences requirements, please be informed that all other applicable federal, provincial and municipal regulations and by-laws must be complied with.

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Mr. W.J. Henderson
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January 11, 1999

For further information on the administration and application of the Revised Licences, please feel free to contact:

Andreas Oertel at (204) 627-8310 regarding Licences 1278 RR and 1339 RR; and
Trent Hreno at (204) 945-7080 regarding Licence 2302 E R.

Yours truly,



Larry Strachan, P. Eng.
Director
Environment Act

Enc.

c: Hon. James C. McCrae, Minister of Environment
S. Davis/B. Crisp/D. Brown
A. Oertel/D. Oertel/T. Hreno
Public Registry 3023.00/Public Registry 3094.50/Public Registry 3094.60
Town of The Pas
David C. Filmon, Aikins, MacAulay & Thorvaldson (FAXED)

NOTE: Confirmation of Receipt (*by the Licencee only*) of these Revised Licences (1278 RR, 1339 RR and 2302 E R), is required by the Director of Approvals. Please acknowledge receipt by signing in the space provided below and faxing back to the Department by January 18, 1999.

On behalf of Tolko Industries Ltd.

Date



Environment

Environmental Management

123 Main Street, Suite 160
Winnipeg MB R3C 1A5
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REPAP MANITOBA INC.
JUSTIFICATION FOR ALTERATION OF COMMISSION RECOMMENDATIONS

The recommendations of the Manitoba Clean Environment Commission have been incorporated into the Licence with the following exceptions/alterations:

- (1) Clean Environment Commission Recommendation B1(g) regarding frequency of monitoring of wastewater contaminants has been changed in Licence Clause B5 as follows:

Dioxin and Furans	:	Weekly from Daily
Resin/Fatty Acids	:	Monthly from 2/Month
Temperature	:	Once per Day from Continuous
Dissolved Oxygen	:	Not Required from Daily.

Justification:

Weekly monitoring for dioxin and furans and monthly monitoring for resin/fatty acids will be sufficient to characterize the quality of the effluent with respect to these pollutants. In addition, the laboratory turnaround time for analysis for dioxin and furans is better suited for weekly than daily samples. The Director will review frequency of sampling required once trends are established. Temperature of the effluent will be uniform due to the nature of the process and treatment system. Monitoring of temperature once per day will be sufficient to characterize trends. Dissolved oxygen is not a pollutant regulated in the discharge. Monitoring for BOD will be indicative of the oxygen demand of the effluent.

- (2) Clean Environment Commission Recommendations B2(a)(ii), B2(b)(ii), B2(c)(ii) specifying sulphur dioxide emissions from the recovery boiler, the lime kiln and the power boiler respectively have been combined into Licence Clause B13 which specifies an annual emission of sulphur dioxide from the pulp mill operation.

Justification:

The amount of sulphur dioxide emitted is small in comparison with other facilities. Continuous monitoring for sulphur dioxide in individual stacks is not reliable. An annual emission limit will serve to protect the receiving environment.

- (3) Clean Environment Commission Recommendations B2(g), B2(h), B2(i) requiring continuous monitoring for sulphur dioxide, total reduced sulphur, opacity, flow rate, and temperature in the recovery boiler stack; for total reduced sulphur, flow rate and temperature in the lime kiln stack; for opacity, flow rate and temperature in the power boiler stack have been changed to Licence Clauses B17, B18, B19 requiring continuous monitoring for total reduced sulphur and opacity in the recovery boiler stack; for total reduced sulphur in the lime kiln stack; and for opacity in the power boiler stack.

Justification:

Instrumentation for continuous monitoring of some pollutants in the industry is not reliable. The Licence will require detailed stack sampling of air emission sources twice per year to determine the level of pollutants being emitted. This level of detailed monitoring in conjunction with continuous monitoring will be sufficient to protect the receiving environment.

- (4) Clean Environment Commission Recommendation B2(m) regarding a 1 hour average ambient air concentration of $70 \mu\text{g}/\text{m}^3$ for suspended particulate matter has not been included in the Licence.

Justification:

There is no recognized ambient air quality criteria for a 1 hour average for total suspended particulate matter. The recognized criteria is the 24 hour average which has been included in the Licence.

- (5) Clean Environment Commission Recommendation C(f):

"(f) Chlorine Dioxide Substitution

Within one year after operation of the Phase I mill commences, the most effective and practical rate of chlorine dioxide substitution, at or near 70% shall be established and implemented."

has not been included in the Licence.

Justification:

The recommendation is process oriented. Establishment of effluent limits for adsorbable organic halogens, dioxins and furans will require maximum technological use of chlorine dioxide substitution in the process. It is expected that the Commission recommendation will be achieved shortly after mill startup.

- (6) Clean Environment Commission Recommendation C(g):

"(g) Citizen Advisory Group

A citizen advisory group shall be established with terms of reference and representation as identified on pages 146 to 150 of this report."

has been changed to Licence Clause C9:

"9. The applicant shall cooperate fully with a Citizen Advisory Group to be established by the Director pursuant to the recommendation of the Manitoba Clean Environment Commission in its Report on Hearings of November, 1989. The applicant shall fund the activities of this group at a level to be specified by the Director in consultation with the applicant."

Justification:

An advisory group will be established; however, the specific representation and terms of reference will be determined by the Director and advisory group members. Funding will properly rest with the Company.

(7) Clean Environment Commission Recommendation C(h)(iii):

"(iii) The citizen advisory group shall be consulted at all stages of the ecosystem monitoring plan, and shall be provided with all monitoring data and reports as they become available."

has not been included in the Licence.

Justification:

Once the advisory committee is formed and terms and reference established, the matter of consultation and information sharing can be finalized.

(8) Clean Environment Commission Recommendation C(i):

"(i) An Environment Officer position shall be staffed and located in the Town of The Pas with the responsibility for acquiring knowledge of, and monitoring the Repap operation."

has not been included in the Licence.

Justification:

The matter of Department staff and responsibility cannot be addressed in a Licence issued to Repap Manitoba Inc.

(9) Clean Environment Commission Recommendation C(j):

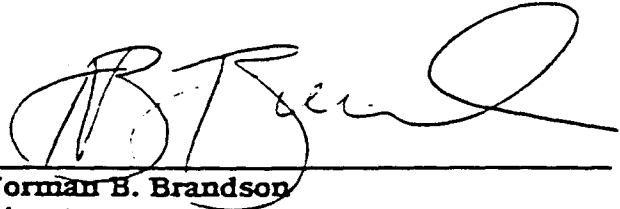
"(j) Licence Review

The Licence shall be reviewed three years from the date of the start-up of the Phase I Mill Conversion."

has not been included in the Licence.

Justification:

A number of Clauses of the Licence will require periodic review. It is anticipated that the Citizen Advisory Group will also conduct periodic review of the Licence. Such review of specific clauses will probably occur sooner, and more frequently than three years. The Environment Act also provides authority for reviewing the Licence.



Norman B. Brandson
Director
Environmental Management Services

FILE: 3023.00