



Box 10000, 623 Main Street, Neepawa, Manitoba R0J 1H0
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June 23, 2022
File: 111440368

Attention: James Capotosto, Director
Environmental Approvals Branch
Manitoba Environment, Climate, and Parks
1007 Century Street
Winnipeg, MB R3H 0W4

Dear Director,

Reference: R3 IWWTF NOA – Licence 2870 RRR R3 Innovations Inc./Town of Neepawa IWWTF, Neepawa, MB

In response to discussions between Manitoba Environment, Climate and Parks (MECP) and HyLife Foods (HyLife) of March 21, 2022, HyLife provides the following information supplemental to the R3 Innovations Inc. Request for Notice of Alteration to Environment Act Licence 2870 RRR, filed on behalf of co-proponents R3 innovations Inc. and the Town of Neepawa on February 23, 2022. This letter addresses MECP's verbally expressed requests for additional information.

MECP Request 1: Please provide confirmation that the previously approved third treatment train, and subsequent proposed permanent use of the expanded treatment system includes capacity to accommodate regular maintenance and upkeep, such that either production at the HyLife processing plant will be curtailed to maintain compliance with wastewater discharge criteria, or that the proposed operation of the R3 IWWTF will continue to provide sufficient treatment, so that the former Springhill IWWTF (SH IWWTF) is not used except under exceptional circumstances, as outlined in Clause 33 of Environment Act Licence 2870RRR.

R3 Innovations Inc. Response:

Operation of the R3 IWWTF, as proposed, includes accommodation for routine maintenance, cleaning, and upkeep of total system components, including taking equipment components offline for servicing. Following completion of the upgrade/expansion project, the R3 IWWTF will have the combined physical capacity to treat over 2,290 m³/day (The Stover Group), provided by the third treatment train from the refurbishment project.

MECP Request 2: Please provide a plan for treatment of the currently held wastewater in the Town of Neepawa Municipal Lagoon Cell #1 as per MCC's correspondence of December 10, 2021.

R3 Innovations Inc. Response:

Partially treated wastewater that had been transferred from the R3 IWWTF to the SH IWWTF for temporary storage in accordance with Clause 33 of Licence 2870 RRR, was proactively transferred to the Primary Cell of the Town of Neepawa's municipal treatment facility as approved by MCC on December 10, 2021. The total amount transferred was approximately 8.9 M US gallons or 33,690 m³ between December 10 and 13, 2021. As per the terms of the approval issued by MCC, R3 Innovations Inc. retains responsibility for the treatment of the



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transferred wastewater to R3 IWWTF effluent standards prior to discharge to the Whitemud River. A plan for treatment of this stored wastewater was outlined in a separate filing, submitted to MECP by HyLife/R3 Innovations Inc. on June 8, 2022 with follow-up information provided by email on July 19, 2022, which outlined a planned feasibility study process and timeline.

MECP Request 3: Please provide a plan for treatment of the currently held wastewater in the SH IWWTF as per MCC's correspondence of December 10, 2021.

R3 Innovations Inc. Response:

The planned infrastructure for transferring temporarily stored wastewater from the SH IWWTF to the R3 IWWTF for treatment and discharge, is outlined in the R3 Lagoon Dewatering System - Conceptual Design Report, prepared by KGS Group (May 26, 2022), included as Attachment A. The system for transfer and treatment of the wastewater is summarized as follows:

- During low periods of wastewater generation from the HyLife pork processing facility (approximately 1 hour per day), wastewater will be transferred from the SH IWWTF Cell #1 to the R3 IWWTF for treatment and discharge to the Whitemud River via the existing R3 IWWTF outfall.
- Cell #1 (the southernmost SH IWWTF cell) was recently relined with an HDPE liner and has an estimated maximum volume of 6,669 m³. Cells #2A, #2B, and #2C are inactive, and not typically used to store wastewater. The northernmost cell is clay-lined (Cell #3) and serves as a back-up for Cell #1 with an estimated maximum volume of 59,600 m³. As wastewater is transferred from Cell #1 to the R3 IWWTF, wastewater will be periodically transferred from Cell #3 to Cell #1 using a mobile pump and flexible overland hose.
- A permanent pump house structure will be constructed on the west side of SH IWWTF Cell #1, outside the base of the berm, to house a centrifugal pump, an electric unit heater to heat the building, intake exhaust fan for ventilation, lighting systems, and an electrical panel.
- The pump will have a flow range of 1 to 9 L/s with a planned average flow rate of 4.5 L/s (approximately 100 m³/week at 1 hour per day).
- The wastewater currently held in Cell #1 will be transferred to Cell #3 to allow access for installation of the intake within the cell, and then transferred back in once installation is complete.
- A perforated, self-cleaning suction intake will be installed in SH IWWTF Cell #1, connected to the pump in the pump house by an 80 mm suction line.
- Discharge to the R3 IWWTF will be via a dedicated 80 mm HDPE pipe (routed below ground) from the pump house to a point upstream of the rotating drum screening equipment and downstream of the existing flow meter within the existing Pretreatment Building at the R3 IWWTF.



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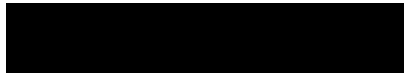
Reference: R3 IWWTF NOA – Licence 2870 RRR R3 Innovations Inc./Town of Neepawa IWWTF, Neepawa, MB

- The discharge pipe will have its own dedicated flow meter to allow for tracking of the quantity of wastewater transferred to the R3 IWWTF. The proposed pump flow range of between 1 to 9 L/s, operating one hour per day, would result in 25 m³ to 227 m³ of wastewater being transferred in a typical week.

The upgraded/expanded R3 IWWTF will have the physical capacity to treat the additional wastewater transferred from the SH IWWTF (up to 227 m³ per week) upon completion of the refurbishment work at the R3 IWWTF. The use of the cells at the SH IWWTF will remain subject to the conditions outlined in Clause 33 of Environment Act Licence 2870 RRR.

Should you require any additional information or clarifications on any of these items please do not hesitate to contact Mr. Sheldon Stott, P.Ag., Senior Director of Corporate Sustainability, HyLife Foods LP.

Regards,



Sheldon Stott, P.Ag. Senior Director of Corporate Sustainability

Attachment A: KGS Group R3 Lagoon Dewatering System – Conceptual Design Report

- c. Stephen Biswanger, Stantec
Colleen Synchyshyn, CAO, Town of Neepawa
Siobhan Burland Ross, MECP
Jennifer Winsor, MECP