CONFIDENTIAL

Canadian Kraft Paper
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Telephone (204 623-7411 Fax (204) 623-4505

April 20, 2018 TM-9834
Code #09-LF-009

Siobhan Burland Ross
Acting Director,
Environmental Approvals Branch
Manitoba Sustainable Development
1007 Century Street
Winnipeg, Manitoba
R3H 0W4

Re: Canadian Kraft Paper Landspreading Pilot Project – Next Steps

Dear Ms. Burland Ross:

In October 2017, Canadian Kraft Paper Industries Ltd. (CKP) received approval from Manitoba Sustainable Development to conduct a Pilot Study for landspreading sludge removed from the north settling basin. We received approval to land apply the sludge on the CKP site, but have not yet received approval to land apply sludge to agricultural lands.

The original intent of this pilot project was to determine the feasibility to land apply sludge generated by the CKP effluent treatment system for pasture production and to reduce the reliance on our onsite landfill. Another key driver of this pilot project is to determine the feasibility of using the sludge to grow grasses on disturbed industrial lands.

Reducing the reliance on landfill fulfils two important factors:

i. The construction of the next cell of the CKP landfill can be deferred for several years. This will allow CKP to invest more capital back into the mill to ensure its long term viability.
ii. It also helps the Province meet its GHG reductions target by diverting organic waste from the landfill.

Due to the timing of last year's project, CKP was only able to partially dredge the north settling basin. The south settling basin is now full and we had to switch back to the north settling basin in March. The north settling basin was only partially dredged last year and is almost full again. As a result, both settling basins will need to be dredged in 2018.

The Pilot Study was originally focused on land applying the sludge to agricultural land in a type of fertilizer application. This part of the pilot study has not received approval yet. The portion of the Pilot Study that has received approval is for land application on the CKP site only. This land is considered to

be disturbed industrial land, not agricultural land. In this application, the sludge is being used as a growing media, as opposed to being used as a fertilizer. No harvesting or grazing will take place on the mill site.

At this point, the primary focus of the Pilot Project is to assess the feasibility of using the sludge as a growing media for native grasses. Growing more vegetation on site will help with dust control. Since this is a non-agricultural application, CKP requests that it be looked at through a slightly different lens. CKP would like to expand the Pilot Study to more locations on site and to vary the application rates in order to fully assess the effectiveness of the sludge as a growing media.

Five additional locations on the CKP mill site, as shown on the attached map, have been identified as potential locations for landspreading the sludge:

- Sites II and III – capped landfills.
- Sites IV, V and VI – similar to Site 2 – disturbed soils, with little vegetation growth, mixed with wood chip waste.

Soil testing of these locations was done last fall and the results are summarized in Table One. The soil at these locations is very similar to the soil found at Sites 2A to 2D.

CKP proposes to use various application rates to study the differences in vegetation growth:

1. Sludge spread with a manure spreader at the target application rate of 156 tonnes per hectare.
2. Sludge spread at a depth of 6 inches.
3. Sludge spread at a depth of 1 foot.
4. Mix the sludge with yard waste and spread to a depth of 6 inches. Yard waste is a mixture of soil and woody debris.
5. Mix the sludge with yard waste and spread to a depth of 1 foot.

Each site will be bermed in order to minimize any potential nutrient run off. Control plots will also be set aside at each location.

As discussed in the Pilot Study, there are only small amounts of nitrogen found in the sludge, therefore the land application rates are based on phosphorus, which is present in a high concentration in the sludge. The testing results for Site 2 show that the plant available phosphorus in the soils is very low (<60 ppm). Thus, there should be no restriction regarding the application of phosphorus. Supplementing soil with plant available phosphorus helps young plants to become established. Mitigating measures (berms) will be implemented in order to minimize any impacts from potential phosphate leaching.

There were also concerns identified in the Pilot Study about elevated molybdenum in the sludge. The levels of molybdenum are over the guideline for agricultural land use, but are well below the CCME soil quality guideline for industrial land use. The levels of molybdenum found in the sludge are not expected to have an impact on plants grown at the application sites.

Bench scale studies are being done at Laurentian University using CKP's sludge mixed with mine tailings. The preliminary results are very promising. They are showing that when mixed with CKP primary sludge, the mine tailings can actually support plant growth. In fact, they showed the higher the sludge

application rate the better the plant growth. The proposed trials on site would provide valuable information for this study, which could be relevant for the mines in Northern Manitoba, as well as for other possible land reclamation initiatives.

Additional points for clarification:

Revised schedule for the Pilot Study:

- Sludge removal phase – October 2017 and Spring/Summer 2018
- Land application phase – October 2017 and Spring/Summer 2018
- Evaluation of effectiveness of land application – Fall 2018 and Spring 2019

Re-spreading sludge:

In the fall of 2017, CKP landspread 690 bdt of sludge on half of Site 2A. A bulldozer was used to spread out the sludge. This process was done under the supervision of our consultant, AECOM. After the land application was completed, the application rate was reviewed and it was found that the sludge had been spread at higher than the recommended rate of 156 tonnes per hectare. A commitment was made at this time to re-spread the sludge in the spring of 2018.

We reviewed with AECOM the issues surrounding the application of sludge to Site 2A during the fall of 2017 and discussed why the recommended application rate of 156 tonnes of sludge per hectare was not met. It was determined that the consistency of the sludge along with the type of equipment used limited how thinly the sludge could be spread out on Site 2A. Due to the "gummy" texture of the material, spreading with a bulldozer proved quite difficult and it was a challenge to get a consistent and even thin layer of sludge. The sludge was spread at an average depth of 6 inches on Site 2A.

As such, we have concluded that respreading the sludge in not feasible. It was spread as thinly as possible last fall. CKP is proposing that the sludge not be re-spread on Site 2A and that this area be considered one of the test plots as discussed above. Site 2A has been bermed in order to minimize any potential nutrient run off.

Although, the trial was very short last fall, we did learn more about how to handle the sludge. We are planning to use a manure spreader to apply the sludge this year. This should enable us to spread the sludge thinner on some of the test plots.

Two settling basins:

The original Pilot Study proposal specified the removal of sludge from the north settling basin. However, the CKP effluent treatment system includes two settling basins prior to the aerated lagoon. Only one settling basin is operated at a time. The effluent comes from the same source (the mill). Since the north settling basin is back in service, it will be necessary to dredge the south settling basin first this year.

The quality of the sludge is similar in both settling basins as shown in the attached Table#2. CKP is requesting confirmation that the approval for this project applies to the sludge from both settling basins and not just the north settling basin.

It is estimated that there is approximately 3,000 bone dry tonnes of sludge in each settling basin for an estimated total of 6,000 bone dry tonnes. This is equivalent to approximately 32,000 m^3 of material.

Pasture Crops:

Clause 4 of the Approval requires that pasture crops grown after the biosolids are applied. Seeding on the area where the sludge was added last fall will be done in the spring, since the landspreading project was done too late in the year for seeding to be done at that time. As discussed in the September 27, 2017 Pilot Study Proposal, a mixture of grasses native to the local region will be grown on Site 2. Pasture crops were planned for only the agricultural sites (Sites 3 to 5). The seed mixture to be used on Site 2 was developed by our Woodlands Department, in conjunction with Manitoba Infrastructure, for use on areas where roads have been decommissioned. The seed mixture will include Fowl Blue grass (*Poa palustris*), Slender Wheatgrass (*Elymus trachycaulus),* Sheep Fescue *(Festuca ovina),* Red Clover *(Trifolium pretense),* Rough Hair Grass *(Agrostis scabra),* and Timothy *(Phleum pretense).*

Clause 20 Requirements:

The requirements of Clause 20 pertain to agricultural land only. The grasses grown on Site 2 will not be harvested and we are not planning to add other sources of nutrients, such as fertilizer or manure, to this land. CKP requests confirmation that the Clause 20 annual post harvest soil testing and reporting only applies to agricultural lands and does not apply to Site 2, which is disturbed industrial land. Please note that since no seeding or post harvest activities have occurred, post harvest soil testing has not been done yet and as such, a report was not submitted by March 15th, 2018.

Clause 17 Requirements:

In the fall of 2017, there was only time to landspread some of the sludge before the ground became frozen. This area has not been seeded and field monitoring has not begun. Clause 17 requires the details of the field monitoring program to be submitted to your office by May 31st, 2018. Since we have yet to go through a growing season, a report will not be submitted to your office this May. CKP requests confirmation that the first report as required by Clause 17 is not due until May 2019.

We would like to have further discussions about what additional information will be required in order to obtain approval for the following trials:

1. To conduct a landspreading trial on agricultural land (Sites 3 to 5). This would be a fertilizer type of application.

2. To conduct a landspreading trial on the former quarry (Site 1), which is located on land adjacent to the mill site in the Tom Lamb Wildlife Management Area. The former quarry contains dirt and woody debris and is fairly barren. Vegetation has not naturally been re-established on this site. This would be another growing media type of application for the sludge in an effort to reclaim this land. Making this area green again would better support wildlife in this area.

3. To landspread secondary sludge removed from the aerated lagoon.

Summary:

In summary, Canadian Kraft Paper is requesting approval at this time for the following:

1. Approval to landspread sludge on other locations on the CKP site - Sites II to VI.

2. Approval to use different application rates on the different plots of land in order to assess the effectiveness of the sludge as a growing media. This includes leaving the sludge at a depth of 6" on Site 2A.

3. Verification that the approval applies to the sludge from both settling basins and not just the north settling basin.

4. Verification that the Clause 20 annual post harvest soil testing only applies to agricultural lands since no harvesting will take place on the CKP site.

5. Verification that Clause 17 is not applicable until May 2019.

We look forward to holding further discussions with your office about this pilot project and the potential beneficial uses for sludge. The NOA form is attached. For further details about this Pilot Study, please refer to the original report that was submitted to your office on September 27, 2017.

If you have any questions or require any further information, please do not hesitate to contact me at (204) 623-8587 or Tamsin Patience, Technical Manager at (204) 623-8619.

Sincerely,

Jayne Sheppard

Jayne Sheppard
Environmental Superintendent

Attach.

cc: Asit Dey, Manitoba Sustainable Development
Tamsin Patience
Andre Murphy
Vanessa Rosenkranz
EC-19

Last saved by: MAHEC (2017-09-21) Last Plotted: 2013-04-22
Filename: P:\60551693\900-CAD_GIS\920-929 (GIS-GRAPHICS)\FIGURES - PILOT STUDY\G005_60551693_01V1_MILLSITEWELLS.MXD
Project Management Initials Designer Checked: Approved
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Pilot Study - Industrial Sludge Land Application Project

Canadian Kraft Paper Industries Ltd., The Pas, MB

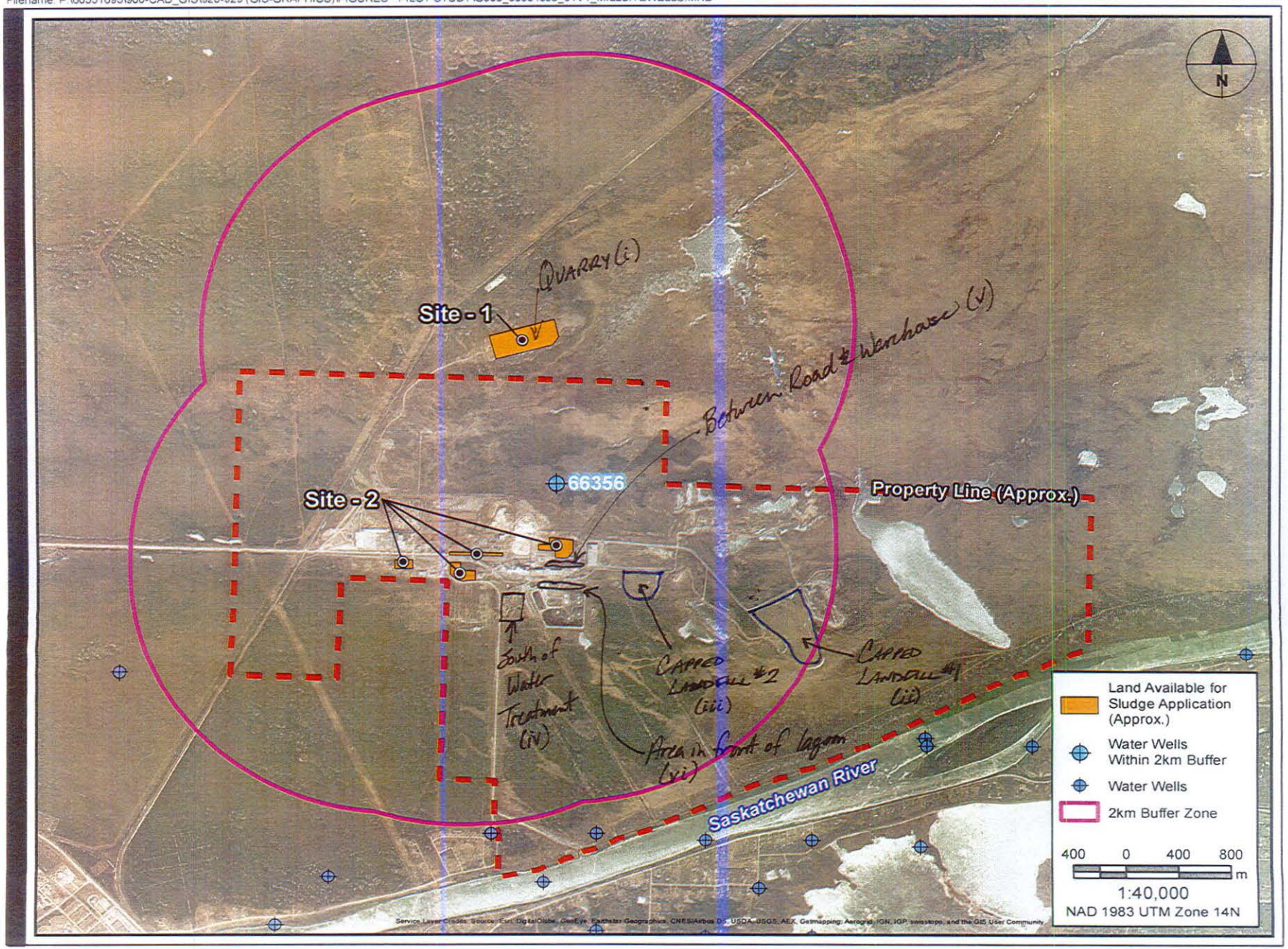

Table One: Soil Testing Results - CKP Locations

Sample ID:	Units	Site 2A	Site 2B	Site 2C	Site 2D	Site II	Site III	Site IV	Site V	Site VI	CCME SQG [a]
Date Sampled:	-	10/25/2017	10/25/2017	10/25/2017	10/25/2017	10/31/2017	10/31/2017	10/31/2017	10/31/2017	10/31/2017	(Industrial)
Miscellaneous Parameters											
Available Phosphate-P	mg/kg					3.6	1.6	1.6	3.6	1.5	NG
Mercury (Hg)	mg/kg	0.0169	0.0284	0.116	0.0158	0.0281	0.0178	0.0186	0.0922	0.0219	50
% Moisture	%					25.1	20.2	21.1	15.5	16.8	NG
Nitrate-N	mg/L					<1.0	<1.0	<1.0	<1.0	<1.0	NG
% Saturation	%					60.0	45.0	48.0	32.0	40.0	NG
pH (1:2 CaCl2)	pH					7.56	7.80	7.76	7.95	7.88	6 to 8
Metals											
Aluminum (Al)	mg/kg	6570	6230	16300	8310	24100	17700	16500	6060	10700	NG
Antimony (Sb)	mg/kg	117	0.22	0.18	0.23	0.16	0.16	0.17	0.12	<0.10	40
Arsenic (As)	mg/kg	2.01	1.87	3.40	2.77	4.35	3.42	3.78	1.72	2.9	12
Barium (Ba)	mg/kg	51.3	69.5	122	67.0	154	129	121	56.9	110	2000
Beryllium (Be)	mg/kg	0.23	0.22	0.46	0.27	0.69	0.47	0.60	0.23	0.34	8
Bismuth (Bi)	mg/kg	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	NG
Boron (B)	mg/kg	10.9	11.4	12.4	11.5	10.2	12.1	14.0	17.6	20.2	ND
Cadmium (Cd)	mg/kg	0.128	0.182	0.136	0.129	0.112	0.131	0.160	0.265	0.149	22
Calcium (Ca)	mg/kg	92800	115000	86800	110000	49700	86200	102000	135000	150000	NG
Chromium (Cr)	mg/kg	32.0	17.9	43.9	24.3	54.7	49.6	42.8	18.8	33.3	87
Cobalt (Co)	mg/kg	4.26	3.91	9.10	5.61	12.9	10.1	9.67	3.95	9.56	300
Copper (Cu)	mg/kg	66.8	11.9	20.3	14.7	22.5	22.8	22.0	13.6	15.7	91
Iron (Fe)	mg/kg	10100	9510	19300	12500	27100	22100	21800	8770	15200	NG
Lead (Pb)	mg/kg	6.96	8.91	10.0	15.6	10.3	7.00	7.29	7.2	4.17	600
Magnesium (Mg)	mg/kg	55400	58300	54200	60500	34300	54100	53700	65800	69200	NG
Manganese (Mn)	mg/kg	250	259	410	302	550	381	431	233	291	NG
Molybdenum (Mo)	mg/kg	2.14	0.51	0.33	0.24	0.22	0.18	0.29	0.47	0.96	40
Nickel (Ni)	mg/kg	24.4	13.9	28.0	19.7	37.2	34.5	29.7	16.2	31.3	89
Phosphorus (P)	mg/kg	248	234	345	293	343	365	363	253	382	NG
Potassium (K)	mg/kg	1180	1390	3230	1990	4420	3870	3470	1440	1870	NG
Selenium (Se)	mg/kg	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	2.9
Silver (Ag)	mg/kg	<0.10	<0.10	<0.10	<0.10	0.11	<0.10	<0.10	<0.10	<0.10	40
Sodium (Na)	mg/kg	109	137	248	222	206	283	359	244	460	NG
Strontium (Sr)	mg/kg	29.7	62.6	34.3	38.2	28.4	41.6	41.0	35.8	45.3	NG
Thallium (Tl)	mg/kg	0.083	0.087	0.204	0.131	0.306	0.242	0.231	0.068	0.114	1
Tin (Sn)	mg/kg	1320	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	300
Titanium (Ti)	mg/kg	297	253	649	432	776	736	707	309	448	NG

Sample ID:	Units	Site 2A	Site 2B	Site 2C	Site 2D	Site II	Site III	Site IV	Site V	Site VI	CCME SQG [a]
Date Sampled:	-	10/25/2017	10/25/2017	10/25/2017	10/25/2017	10/31/2017	10/31/2017	10/31/2017	10/31/2017	10/31/2017	**(Industrial)**
Uranium (U)	mg/kg	0.882	0.475	0.548	0.469	0.681	0.720	0.828	0.368	0.446	**300**
Vandium (V)	mg/kg	20.7	18.0	41.2	25.2	55.7	49.0	46.4	18.2	27.7	**130**
Zinc (Zc)	mg/kg	31.6	45.4	53.9	45.9	63.9	50.9	53.2	43.5	37.0	**360**
Total N, P, K, S											
Metals in Soil by CRC ICPMS											
Phosphorus (P)	mg/kg					315	299	280	233	313	**NG**
Potassium (K)	mg/L					3770	2540	2490	1140	1630	**NG**
Total Nitrogen by combustion method											
Total Nitrogen by LECO	%					0.095	0.054	0.045	0.048	0.065	**NG**
Total Sulphur by combustion method											
Sulfur (S) - Total	mg/kg					600	500	<500	<500	500	**ND**

Notes:

[a] *Canadian Council of Ministers of the Environment (CCME) Soil Quality Guidelines (2014) – Industrial Land Use*

1. All results and soil quality guidelines in mg/kg, unless otherwise noted.

2. NG – No guideline.

3. ND – Guideline for agricultural land use, but no data for industrial land use.

Table Two: Sludge Testing Results

Sample ID:	Units	Primary Sludge-North Settling Basin			Primary Sludge-South Settling Basin	CCME SQG [a]	CCME SQG [b]
Date Sampled:	-	7/27/2017	7/27/2017	11/1/2017	11/1/2017	(Agriculture)	(Industrial)
Total Carbon, TOC and TIC in Soil							
Inorganic Carbon (as CaCO3 Equivalent)	%	14.1	14.1	22.0	9.30	NG	NG
Total Carbon by Combustion	%	38.9	32.7	39.0	46.5	NG	NG
Inorganic Carbon	%	1.69	1.69	2.64	1.12	NG	NG
Total Organic Carbon	%	37.2	31	36.4	45.4	NG	NG
Miscellaneous Parameters							
Moisture	%	79.5	78.5	88.6	86.5	NG	NG
Available Phosphate-P	mg/kg	58.3	61.8	100	143	NG	NG
Specific Gravity	kg/m3	1040	912	1020	1010	NG	NG
Nitrate-N	mg/L	<1.0	<1.0	<1.0	<1.0	NG	NG
pH	pH	7.13	7.21	7.63	7.23	6 to 8	6 to 8
Available Micronutrients							
Copper (Cu)	mg/kg	1.9	1.72	2.2	2.1	NG	NG
Iron (Fe)	mg/kg	333	293	734	684	NG	NG
Manganese (Mn)	mg/kg	46.8	50.8	66.1	62.2	NG	NG
Zinc (Zc)	mg/kg	50.7	53.5	35.9	45.5	NG	NG
Metals							
Aluminum (Al)	mg/kg	5750	5370	6360	6660	NG	NG
Antimony (Sb)	mg/kg	0.32	0.29	0.31	0.88	20	40
Arsenic (As)	mg/kg	0.95	0.84	1.00	0.87	12	12
Barium (Ba)	mg/kg	111	98.8	157	105	750	2000
Beryllium (Be)	mg/kg	0.11	0.1	0.14	0.11	4	8
Bismuth (Bi)	mg/kg	0.038	0.032	<0.20	<0.20	NG	NG
Boron (B)	mg/kg	<10	<10	6.7	7.7	2	ND
Cadmium (Cd)	mg/kg	1.27	1.2	1.2	1.27	1.4	22
Calcium (Ca)	mg/kg	34900	30900	69800	22800	NG	NG
Chromium (Cr)	mg/kg	16.6	15	16.8	15.5	64	87
Cobalt (Co)	mg/kg	1.52	1.44	1.62	1.37	40	300
Copper (Cu)	mg/kg	21.8	20	22.9	24.3	63	91
Iron (Fe)	mg/kg	3520	3230	3780	2950	NG	NG
Lead (Pb)	mg/kg	5.49	5.13	4.71	5.12	70	600
Magnesium (Mg)	mg/kg	5230	4760	5370	3280	NG	NG
Manganese (Mn)	mg/kg	196	175	278	168	NG	NG
Molybdenum (Mo)	mg/kg	9.99	9.25	8.33	13.9	5	40
Nickel (Ni)	mg/kg	15.6	15.1	14.2	14.6	45	89
Phosphorus (P)	mg/kg	1600	1480	1880	2570	NG	NG
Potassium (K)	mg/kg	696	646	920	630	NG	NG
Selenium (Se)	mg/kg	<0.50	<0.50	<0.20	0.23	1	2.9
Silver (Ag)	mg/kg	0.55	0.45	0.52	0.36	20	40
Sodium (Na)	mg/kg	622	607	1320	752	NG	NG
Strontium (Sr)	mg/kg	42.7	38.4	54.2	26.6	NG	NG
Thallium (Tl)	mg/kg	<0.10	<0.10	0.091	0.061	1	1
Tin (Sn)	mg/kg	<5.0	<5.0	<2.0	<2.0	5	300
Titanium (Ti)	mg/kg	80.2	73.1	99.5	70.7	NG	NG
Uranium (U)	mg/kg	1.27	1.21	0.913	1.11	23	300

Sample ID:	Units	Primary Sludge-North Settling Basin			Primary Sludge-South Settling Basin	CCME SQG [a]	CCME SQG [b]
Date Sampled:	-	7/27/2017	7/27/2017	11/1/2017	11/1/2017	(Agriculture)	(Industrial)
Vandium (V)	mg/kg	8.96	8.3	8.21	8.11	130	130
Zinc (Zc)	mg/kg	185	170	187	255	200	360
Available N, P, and K							
Available Nitrate-N	mg/kg	<15	<15	<15	25	NG	NG
Available Phosphate-P	mg/kg	285	337	380	530	NG	NG
Available Potassium	mg/kg	200	233	541	399	NG	NG
Total N, P, K, S							
Total Nitrogen by LECO	%	0.813	0.736	0.517	0.665	NG	NG
Sulfur (S) - Total	mg/kg	9600	7200	10200	10300	NG	NG
Detailed Salinity							
Chloride (Cl)	mg/kg	290	287	13.4	14.5	NG	NG
Calcium (Ca)	mg/kg	5070	4400	5070	169	NG	NG
Magnesium (Mg)	mg/kg	529	482	750	610	NG	NG
Potassium (K)	mg/kg	195	180	200	180	NG	NG
Sodium (Na)	mg/kg	573	521	1030	770	NG	NG
Sulfur (S)	mg/kg	1060	969	430	130	500	ND
Nitrate-N	mg/kg	<3.9	<3.4	<12	<12	NG	NG
SAR, Cations and SO4 in Saturated Soil							
Calcium (Ca)	mg/L	1300	1280	432	396	NG	NG
Potassium (K)	mg/L	50	52	17	15	NG	NG
Magnesium (Mg)	mg/L	135	140	64	52	NG	NG
Sodium (Na)	mg/L	146	151	88	65	NG	NG
SAR	SAR	1.03	1.07	1.04	0.82	5	5
Sulfur (as SO4)	mg/L	271	282	36	11	NG	NG

Notes:

[a] *Canadian Council of Ministers of the Environment (CCME) Soil Quality Guidelines (2014) – Agriculture Land Use*

[b] *Canadian Council of Ministers of the Environment (CCME) Soil Quality Guidelines (2014) – Industrial Land Use*

1. All results and soil quality guidelines in mg/kg, unless otherwise noted.

2. NG – No guideline.

3. ND – Guideline for agricultural land use, but no data for industrial land use.

4. Sludge samples - composite sample collected from three locations within the north basin approximately 2-3 feet in depth.

Notice of Alteration Form

Manitoba
Sustainable Development

Client File No. :	Environment Act Licence No. : 1339R

Legal name of the Licencee: Canadian Kraft Paper Industries Ltd.

Name of the development: Canadian Kraft Paper Industries Ltd.

Category and Type of development per Classes of Development Regulation:

Forestry — Pulp and paper mills

Licencee Contact Person: Jayne Sheppard, Environmental Superintendent
Mailing address of the Licencee: PO Box 1590
City: The Pas Province: MB Postal Code: R9A 1L4
Phone Number: (204) 623-8587 Fax: (204) 623-5995 Email: jayne.sheppard@ckpi.com

Name of proponent contact person for purposes of the environmental assessment (e.g. consultant):

Phone: Fax:	Mailing address:

Email address:

Short Description of Alteration *(max 90 characters):*

Landspreading Pilot Project next steps - additional test sites & varied application rates.

Alteration fee attached: Yes: ☐ No: ☑

If No, please explain: Continuation of existing pilot project. Reduction in landfill GHG emissions.

Date: 2018-04-18	Signature: Jayne Sheppard Printed name: Jayne Sheppard

A complete Notice of Alteration **(NoA)** consists of the following components:

- ☑ **Cover letter**
- ☑ **Notice of Alteration Form**
- ☐ **4 hard copies and 1 electronic copy of the NOA detailed report** (see "Information Bulletin - Alteration to Developments with Environment Act Licences")
- ☐ **$500 Application fee, if applicable** (Cheque, payable to the Minister of Finance)

Submit the complete NOA to:

Director
Environmental Approvals Branch
Manitoba Sustainable Development
Box 80, Suite 160, 123 Main Street
Winnipeg, Manitoba R3C 1A5

For more information:

Phone: (204) 945-8321
Fax: (204) 945-5229
http://www.gov.mb.ca/sd/eal

Note: Per Section 14(3) of the Environment Act, Major Notices of Alteration must be filed through submission of an Environment Act Proposal Form (see "Information Bulletin – Environment Act Proposal Report Guidelines")