



Canadian Kraft Paper

Canadian Kraft Paper Industries Limited

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**CONFIDENTIAL**

May 29, 2018

TM-9837

Code #09-LF-009

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

**Re: May 28<sup>th</sup> Request for Additional Information - File 3023.00**

Dear Ms. Burland Ross:

Asit Dey, Tamsin Patience, Vanessa Rosenkranz and I had a telephone conversation yesterday to further discuss Canadian Kraft Paper's landspreading pilot project. The following information was requested during that conversation:

1. Revise Table 1 from CKP's May 24/18 letter:

There was an error in Table 1 for site 2A. The portion of site 2A that already had sludge applied to it was included in the total number of hectares. This has now been corrected, as was the amount of material that will be applied to the rest of site 2A and the total planned for 2018.

The term "extra" has been changed to "contingency" in order to clarify that the extra areas set aside are for a contingency should there be more sludge removed from the settling basins and aerated lagoon than originally estimated.

Revised Table 1: Proposed Application Rates and Locations

Phase	Site	# of Hectares	Rate	BDT of material
<b>1</b>	<b>2A</b>	<b>4.0</b>	345.7 tonne/Ha mix with yard waste 1:1 @ 1'	<b>1382.8</b>
<b>1</b>	<b>2B</b>	0.72	691.4 tonne/Ha @ 1'	497.8
<b>1</b>	<b>2C</b>	0.89	Test plots	218.4
<b>1/2/3</b>	<b>Capped landfill 1 (ii)</b>	6.9	691.4 tonne/Ha or 1'	4770.7
<b>3</b>	<b>Capped landfill 2 (iii)</b>	3.5	345.7 ton/Ha or 6"	1209.9
			<b>Total 2018</b>	<b>8079.6</b>
<b>Contingency</b>	<b>2D</b>	1.3	156 ton/Ha or 3"	202.8
<b>Contingency</b>	<b>Front of lagoon (vi)</b>	0.6	156 ton/Ha or 3"	93.6
<b>Contingency</b>	<b>South of water treatment (iv)</b>	2.8	156 ton/Ha or 3"	436.8
			<b>Total contingency</b>	<b>733.2</b>

## 2. Application Methods:

It was also discussed that depending upon the application rate either a bull dozer or a manure spread would be used. A bull dozer will be used when the sludge is to be spread at 6 inch or 1 foot depths. The manure spreader will be used when the sludge is to be spread thinly (< 6"). The depth of the sludge will be monitored and measured during the application.

## 3. Combine Required Annual Reporting into One Report:

The October 27, 2017 Minor Alteration Approval requires the submission of four reports each year:

- Clause 16 – due December 1<sup>st</sup>
- Clause 17 – due May 31<sup>st</sup>
- Clause 19 – due December 30<sup>th</sup>
- Clause 20 – due March 15<sup>th</sup>

Clause 16 and Clause 19 reports were submitted to your office last year following the application of sludge to site 2A.

As discussed in my April 20, 2018 letter, a Clause 20 report was not submitted to your office in March 2018 since no post-harvest activities had occurred. During our May 28 telephone conversation, it was agreed that Clause 20 does not apply to this pilot project, since no harvesting will take place. Clause 20 pertains to agricultural applications only, so no Clause 20 reports will be submitted.

Also discussed in my April 20, 2018 letter were the requirements of Clause 17. There was only time in 2017 to land apply a relatively small amount of sludge on site 2A before freeze up. It was not seeded and no field monitoring was done. Since this land then remained frozen until the middle of May, it was

not possible to sample site 2A and submit a report by May 31<sup>st</sup>. The CKP pilot project involves spring/early summer land application of sludge, so the monitoring requirements of Clause 17 will be done throughout the summer, with sampling taking place in the early fall.

CKP requests that the reporting due date for Clauses 16 and 17 be changed to December 30 each year, which is the same as Clause 19. One combined report would then be submitted for the next three years by December 30<sup>th</sup>.

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, P. Eng.  
Environmental Superintendent

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