

May 5, 2020

Shannon Kohler
A/Director Environmental Compliance and Enforcement Branch
Manitoba Conservation & Climate
1007 Century Street
Winnipeg, MB R3H 0W4

Dear Shannon Kohler:

Thank you for your quick response to Canadian Kraft Paper Industries (CKP) letter dated April 9, 2020, to the Honourable Sarah Guillemard, regarding compliance concerns during COVID-19 pandemic. I have been asked to respond on behalf of Andre Murphy, CKP General Manager, and Ann Evans, CKP CFO.

As requested, CKP is providing a list of non-critical requirements and/or clauses from our licenses that we would like to deviate or delay to free up some resources for COVID-19 response:

- Environment Act Licence #1339RR – Part A, Section 4 – Flexibility requested for deadline to submit monthly effluent report within 30 days of the end of the month. CKP is requesting an extension of up to 90 days of the end of the month.
- Environment Act Licence #1339RR – June 12, 2018 Minor Alteration Approval – Land Application of Industrial Sludge (Pilot Study) – Section 20. CKP is requesting three month extension for annual report that is due by December 31st, 2020. The extended due date would be March 30, 2021.
- Waste Disposal Ground Operating Permit #5-062 – Section 9. CKP is requesting approval to skip the annual sampling requirement for 2020. Samples are usually collected in the summer months and require technicians to work in close contact when collecting the samples. It would also be a savings of \$5000.
- MR 188/2001 *Storage and Handling of Petroleum Products and Allied Products Regulation* - Manitoba Technical Bulletin PSF-005 Inspection & Maintenance Requirements of Storage Tank Systems. CKP is requesting approval to waive the annual inspection requirements for the nine permitted storage tanks onsite. Annual inspections must be conducted by a Licensed Petroleum Technician (usually from Winnipeg). CKP is postponing all non-critical contractors from coming onsite during the COVID-19 pandemic. CKP would continue to do in-house inspections to confirm there were no leaking pumps, lines or concerns with the systems.

Thank you for your consideration to the above requests for temporarily extending deadlines for these non-critical reports and annual testing requirements. CKP will continue to act in a responsible manner toward meeting all regulatory requirements.

Regards,



Tamsin Patience, P. Eng.
Technical Manager



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cc:

Honourable Sara Guillemard, Minister of Conversation and Climate

Andre Murphy, General Manager – CKP

Ann Evans, Chief Financial Operator – CKP

Jayne Sheppard, Environmental Superintendent – CKP

Leigh Johnston, Environmental Team Lead - CKP