



Environmental Stewardship Division  
Environmental Approvals Branch  
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File No.: 3023.00

May 28, 2021

Leigh Johnston  
Canadian Kraft Paper Industries Ltd. (CKPI)  
PO Box 1590  
The Pas MB R9A 1L4  
leigh.johnston@ckpi.com

**Re: Continuation of Land Spreading Pilot Study on CKPI Mill Site**

Dear Leigh Johnston:

I am responding to the February 11, 2021 Notice of Alteration (NoA) letter respecting continuation of the land spreading pilot study at sites associated with the Canadian Kraft Paper Industries Ltd. (CKPI) mill. Environment Act Licence No. 1339 RR applies to CKPI's activities at the associated sites. Approval to initiate this pilot study and continue with it until April 30, 2022 was provided in a June 12, 2018 Director's letter.

The purpose of the pilot study was to allow CKPI the opportunity to determine if a beneficial use program for process sludge produced at the site could be developed. During recent discussions between representatives of CKPI and the Environmental Approvals Branch, CKPI was requested to submit an Environment Act Proposal and receive an Environment Act Licence for these activities to continue following completion of the pilot study.

The recent NoA letter provides a general description of land spreading activities undertaken to date, indicating that between four sites comprising a total of 17.9 hectares a total of 10,570.63 bone dry tons of material has been land applied since the pilot study commenced. Table 2 of the NoA letter provides a description of CKPI's proposed land application sites for 2021. The NoA letter also indicates that utilization of other sites on CKPI's property may potentially be identified to have sludge land applied following determinations of potential need to do so and results of any background soil testing.

After careful review of the February 12, 2021 NoA letter and the June 12, 2018 approval letter, I have concluded that the environmental effects of the identified continuation activities for the previously approved pilot study proposed to commence in May 2021 will be insignificant, and, therefore, pursuant to Section 14(2) of The Environment Act are approved as follows:

1. Biosolids materials will be sourced only from the lagoon and the north and south settling basins.
2. Biosolids may be land applied at locations and rates as follows:

Site	# of Hectares	Rate	Bone Dry Tonnes of Material
2D	1.3	691.4 tonne/Ha or 1' in depth	899
Front of Lagoon (vi)	0.6	691.4 tonne/Ha or 1' in depth	415
South of Water Treatment (iv)	2.8	691.4 tonne/Ha or 1' in depth	1936
North of Sawmill	2.15	691.4 tonne/Ha or 1' in depth	1451
Totals	5.85		4701

3. Additional application sites, including Sites 2A, 2B and portions of CLF1, may, upon Director approval, be added provided:
  - a) new samples are collected and analyzed for the available phosphorus in the soils at these sites,
  - b) the results are provided to the Director providing an indication of what application rates for additional biosolids may be permissible ensuring the soil concentration of available phosphorous remains less than 60 ppm, and
  - c) the Director provides written approval.

4. Sites receiving biosolids materials must have a means of effectively collecting any surface runoff with collected liquids being returned to a site setting basin or lagoon cell.

Approval for additional pilot study activities to be completed prior to April 30, 2022 may be requested by submission of a new Notice of Alteration.

If you have any questions on these matters, please contact Robert Boswick, Senior Environmental Engineer, Environmental Approvals Branch, at [Robert.Boswick@gov.mb.ca](mailto:Robert.Boswick@gov.mb.ca) or 204-918-5853.

Sincerely,

Original Signed by  
Siobhan Burland Ross

for Shannon Kohler, Director  
The Environment Act

cc: Tamsin Patience - CKPI  
Kristal Harman, Yvonne Hawryliuk, Tyler Kneeshaw - Environmental Compliance and Enforcement  
Siobhan Burland Ross, Robert Boswick - Environmental Approvals  
Public Registry