



Environmental Stewardship Division
Environmental Approvals Branch
1007 Century St
Winnipeg Manitoba R3H 0W4
T 204 945-8321 F 204-945-5229
www.gov.mb.ca/sd

August 16, 2021

File No: 3023.00

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 – Additional Application Sites

Dear Leigh Johnston:

I am responding to the July 16, 2021 email regarding a request to approve the inclusion of additional application sites for the 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. The additional application sites were requested to be included in the activities identified in the February 11, 2021 Notice of Alteration (NoA) but use of these sites was not approved in the May 28, 2021 approval 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. Approval to initiate and continue this pilot study until April 30, 2022 was provided in a June 12, 2018 Director's letter.

Table 1 of the July 16, 2021 email provides results of available phosphorus test results for seven sites that have previously been included in this pilot study. The data indicates that four of the seven sites already have available phosphorus concentrations greater than the allowable 60 mg/kg. Table 2 provides proposed application rates for the three sites that were determined to have available phosphorus concentrations below that allowable value and are therefore being requested to be included with the current planned activities.

After careful review of the July 16, 2021 email, 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 continue this summer 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
2a (Zone 1)	2.18	691.4 tonee/Ha or 1' in depth	1507.25
2a (Zone 3)	1.36	691.4 tonee/Ha or 1' in depth	940.30
CLF1 (Zone 2)	2.39	691.4 tonee/Ha or 1' in depth	1652.45

3. 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.
4. Effective scheduled sampling, recording, and analysis of applied materials and site conditions must occur in accordance with the requirements identified in the June 12, 2018 director's approval letter to the April 20, 2018 Notice of Alteration and related subsequent correspondences to the satisfaction of the director.

As identified in previous correspondence, 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 (204) 918-5853 or Robert.Boswick@gov.mb.ca.

Sincerely,

Original Signed by

Laura Pyles, A/Director
The Environment Act

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