


# Notice of Alteration Form



File No. :		Environment Act Licence No. : 1339R	
Legal name of the Licensee: 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 <input type="button" value="v"/> <SELECT> <input type="button" value="v"/>			
Licensee Contact Person: Lisa Jones Mailing address of the Licensee: PO Box 1590 City: The Pas Province: MB Postal Code: R9A 1L4 Phone Number: (204) 623-8450 Fax: Email: lisa.jones@ckpi.com			
Name of proponent contact person for purposes of the environmental assessment (e.g. consultant):			
Phone:		Mailing address:	
Fax:			
Email address:			
Short Description of Alteration (max 90 characters): Continuation of the Landspreading Project on Canaidian Kraft Paper's Millsite			
Alteration fee attached: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
If No, please explain:			
Date: 2024-07-30		Signature:  Printed name: Lisa Jones	
<p>A complete Notice of Alteration (NoA) consists of the following components:</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Cover letter</li><li><input type="checkbox"/> Notice of Alteration Form</li><li><input type="checkbox"/> 1 electronic copy of the NoA detailed report (see "<a href="#">Information Bulletin - Alteration to Developments with Environment Act Licences</a>")</li><li><input type="checkbox"/> \$500 Application fee, if applicable (Cheque, payable to the Minister of Finance)</li></ul>		<p><b>Submit the complete NoA to:</b> Director, Environmental Approvals Branch Environment and Climate Change Box 35, 14 Fultz Blvd Winnipeg MB R3Y 0L6 <a href="mailto:EABDirector@gov.mb.ca">EABDirector@gov.mb.ca</a> <b>For more information:</b> Toll-Free: 1-800-282-8069 Phone: 204-945-8321 Fax: 204-945-5229 <a href="https://www.gov.mb.ca/sd/permits_licenses_approvals/eal/licence/index.html">https://www.gov.mb.ca/sd/permits_licenses_approvals/eal/licence/index.html</a></p>	
<p><b>Note: Per Section 14(3) of the Environment Act, Major Notices of Alteration must be filed through submission of an <a href="#">Environment Act Proposal Form</a> (see "<a href="#">Information Bulletin – Environment Act Proposal Report Guidelines</a>")</b></p>			



PO Box 1590 • The Pas, Manitoba • R9A 1L4

Telephone (204) 623-7411

July 30, 2023

TM-10087  
Code #09-LF-009

Agnes Wittmann,  
Director  
Environmental Approvals Branch  
Manitoba Environment and Climate  
14 Fultz Boulevard  
Winnipeg, Manitoba  
R3Y 0L6

**Re: Canadian Kraft Paper Biosolids Landspreading Project – 2024 Continuation**

Dear Ms. Wittmann:

Since October 2017 Canadian Kraft Paper Industries (CKP), with the approval of Manitoba Environment and Climate (MEC), has undertaken a Landspreading Pilot Study Project which involves removing biosolids from the effluent treatment system and applying it to industrial lands on CKP's millsite. The initial Pilot Study approval was valid until April 30, 2022. On May 25, 2023, CKP submitted an Environmental Act License Proposal (EALP) to continue with the land application of biosolids on site. While the Environmental Act License approval process was taking place CKP was advised by MEC to submit a NoA to carry out landspreading in 2023, as such a NoA was submitted on July 31, 2023 and later approved. With the EAL approval process still ongoing, CKP is requesting a NoA for 2024 to carry out landspreading onsite this summer/fall. This will allow for the removal of primary biosolids from the effluent treatment system in order to maintain the system's treatment efficiency. A summary of volumes landspread in 2023 can be found in Table 1.

*Table 1: 2023 Landspreading Volume and Location*

Year	Site	# Hectares	Rate (BDT/Ha)	Bone Dry Tons of Material (BDT)	Source of Biosolids
2023	Capped Landfill 1 Zone 4	5.06	1113.38	2900.28	North Settling Basin
2023	North of Sawmill	1.41	1100.44	249.81	North Settling Basin
<b>Total</b>				<b>3150.09</b>	

*NOTE: Only a portion of North of Sawmill was used in 2023*

For 2024, primary biosolids from the South Settling Basin (SSB) will be dredged in order to maintain the health of the effluent treatment system. Based on previous years, it is estimated that roughly 3000 BDT will be removed from the settling basin. The plan is to spread this material on approved sites at the millsite.

### Biosolids Landspreading in 2024:

MEC has approved the spreading of an additional layer of biosolids on previously landspread sites, with the stipulation that phosphorus concentrations in the soil are less than 60 ppm. As such, CKP plans to landspread an additional layer of biosolids on some sites where phosphorus concentration is below the 60 ppm limit. Based on fall 2023 testing of the landspreading sites, CKP is requesting to landspread biosolids on Site 2B, Site 2A Zone 2, North of Sawmill, and South of Water Treatment (Figure 1, Figure 2). The approval of these 4 sites will ensure ensure that sufficient area is available to landspread the material removed from the settling basin.

*Table 2: 2024 Proposed Landspreading Sites (hectares estimated from Google Earth)*

Source of Biosolids in 2024	Site	#Hectares	Rate	Bone Dry Tonnes of Material
SSB	Site 2B	0.72	691.4 Tonne/Ha or 1' in depth	498
SSB	Site 2A Zone 2	1.18	691.4 Tonne/Ha or 1' in depth	684
SSB	North of Sawmill	0.99	691.4 Tonne/Ha or 1' in depth	975
SSB	South of Water Treatment	2.13	691.4 Tonne/Ha or 1' in depth	1,473
<b>Total</b>		5.02		3,630

*Figure 1: CKP Millsite with Proposed Landspreading Sites Site 2B, Site 2A Zone 2, North of the Sawmill*

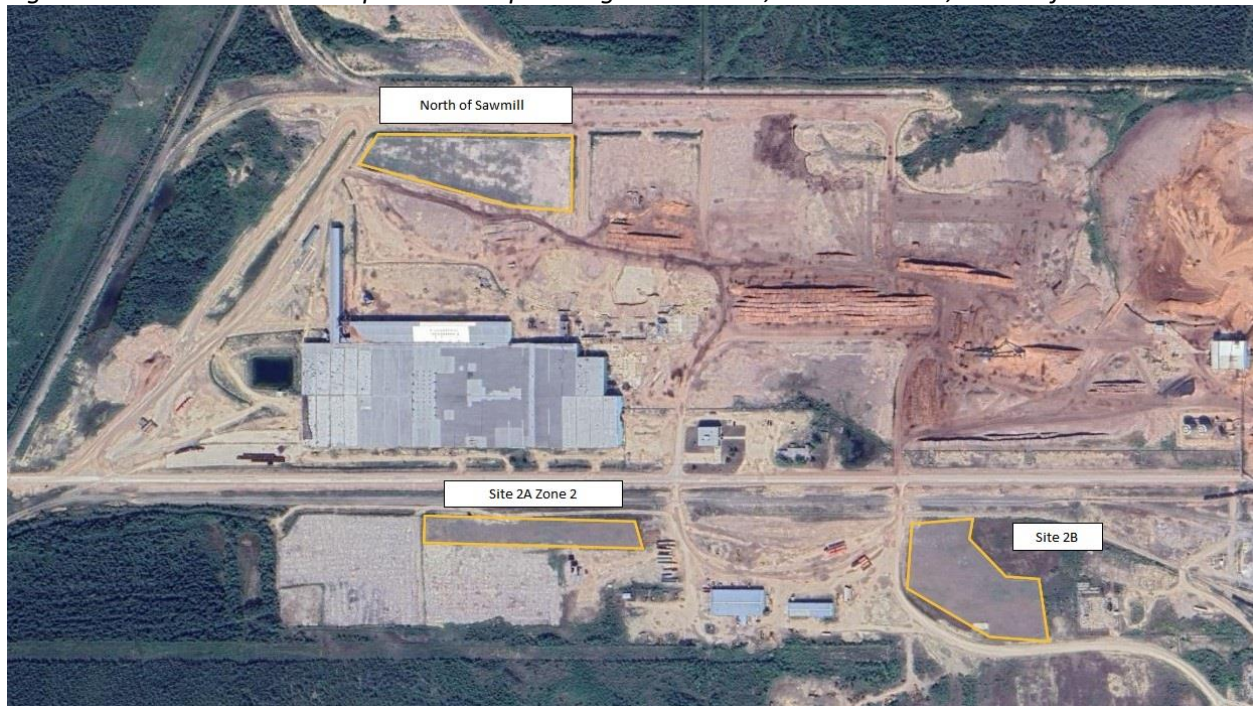




Figure 2: Proposed Landspreading Site South of Water Treatment.



Table 3 lists the available phosphorus from 15 and 30 cm depths (composite samples) on landspreading sites at CKP. Note that the results from the control areas and site 2D, are all background soil values (no biosolids were applied on these sites). The remaining results are from sites with biosolids were applied over bare soils, as such the samples would contain a combination of both native soils and biosolids. There are several sites, that include Site 2A/2B, North of Sawmill, South of Water Treatment, and portions of CLF1, where available phosphorus levels are currently below 60 ppm after biosolids application. Based on the data collected between 2017 to 2023, CKP believes that the fall sampling data is indicative of current nutrient levels, as land management practices have not changed and there is a general downward trend of phosphorus levels over time. With 3-5 years of weathering and plant growth on these sites, biosolid depths have reduced to 3-4" in some locations from the initial depth of 1 foot. In some locations the overlying biosolids have become nearly homogenous with the underlying soils.

Table 3: Available P for all Landspreading Sites from 2017-2023

Site	Depth (cm)	Year	Source of Biosolids/Material	2017	2018	2019	2020	2021	2022	2023
Site 2A – Zone 1	0-15	2017	North Basin/South Basin	1.8	35.3	25.1	25.0	-	30.4	45.8
Site 2A – Zone 2	0-15	2018	South Basin	1.8	118	58.5	36.8	18.4	-	-
Site 2A – Zone 3	0-15	2018	South Basin/Yard Waste	1.8	45.8	18.5	41.8	32.4	28.1	52.9
Site 2A Control	0-15	-	-	-	<1.0	<1.0	<1.0	<2.0	50.6	-
Site 2B	0-15	2018	South Basin	1.8	58.1	42.9	21.5	21.8	-	-
Site 2B Control	0-30	-	-	-	1.3	2.3	1.5	1.9	<1.0	2.4
CLF1 – Zone1	0-30	2018	South Basin	3.6	55.7	69.7	83.1	85.6	-	-
CLF1 – Zone 2	0-30	2019/2021	North basin/ Aerated Lagoon	3.6	-	49.4	72.0	103	195	132
CLF1 – Zone 3	0-30	2018/2019	Aerated Lagoon	3.6	113	244	137	166	249	-

CLF1 – Zone 4	0-30	2020	South basin	-	-	-	56.2	39.2	42.4	39.6
CLF2	0-30	2020	South Basin/ Aerated Lagoon	1.6	-	-	49.7	68.1	61.3	74.2
Site 2D	0-15	-	-	-	-	-	<1.0	-	-	-
North of Sawmill	0-15	2021	North Basin	-	-	2.8	-	27.0	36.4	36.2
South of Water Treatment	0-15	2021	North Basin	1.6	-	-	-	30.9	22.4	26.9

NOTE: That there is some variation in levels due to changing sample locations.

Each site listed in Table 2 that will receive biosolids will be bermed prior to application in order to capture any potential run-off. A formal monitoring program is in place, specifically, weekly inspections of the landspread areas will take place. This includes ensuring the integrity of the berms and removal of any standing water (using a vacuum truck) that has the potential to breach the berms. Any water removed from inside the berm will be taken to the effluent treatment system for disposal.

CKP has scheduled a contractor to begin dredging the settling basin in mid-August, landspreading would also start at this time. In order to successfully complete dredging and landspread the material in a timely matter CKP is requesting a response regarding this NoA by August 9, 2024. This would ensure that there is no delay in the planned work and align with the contractor's availability.

Sincerely,



Lisa Jones  
Environmental Team Lead

Attach.

cc: Robert Boswick, Environmental Approvals Branch, Winnipeg  
Siobhan Burland Ross, Environmental Approvals Branch, Winnipeg  
Cristal Huculak, Environmental Compliance and Enforcement, The Pas  
Halle Fines, Environmental Compliance and Enforcement, The Pas  
Leigh Johnston, Mill Services Manager  
Minsoo Kim, Environmental Coordinator  
Tamsin Patience, Director of Mill Services

## Appendix A

*Photograph 1: North of the Sawmill, June 26, 2024*



*Photograph 2: Site 2A Zone 2, July 12, 2024*





*Photograph 3: Site 2B, July 12, 2024*



*Photograph 4: South of Water Treatment, July 12, 2024*

