

June 4, 2020

***Shannon Kohler***

Acting Director, Environmental Compliance and Enforcement Branch  
Director, Environmental Approvals Branch  
Manitoba Conservation and Climate

Dear Ms. Kohler

**Re: Request for Postponement of 2020 Mill Stack Testing**

As per Clause 16 of our Environmental Act Licence 2954 RR, The Licencee shall conduct stack emission monitoring, while the Development is operating at or above the reference level, for each component and parameter listed in Schedule 4 attached to this Licence:

- a) prior to December 31, 2012;
- b) every two years thereafter.

We are requesting the postponement of the stack testing requirement for 2020 to 2021 and then proceed every two years thereafter 2021. There are several reasons for this request. Due to the Covid-19 pandemic and the market uncertainties, the mill's run schedule has been reduced by three weeks in Q2 and we are uncertain about the Q3 run schedule, but expect curtailments during this period considering the current state of the economy and its slow re-opening. The relief in the expense of not having to perform stack testing in 2020 would be a critical asset currently for our mill as we have had to lay off employees already in Q2 and expect the same in Q3.

Exacerbating the issue is trying to schedule our stack testers who come out of Minneapolis, MN, with the current out of province and out of country restrictions due to Covid-19. We have been deemed an essential service, but not a vital service and therefore the workers coming from out of country would be required to self-isolate for 14 days once in MB prior to coming to site, which is not reasonably practicable. Lastly, the window for being able to book the stack testing company is closing fast as we need to be able to test prior to September since we will be curtailed from September 1<sup>st</sup> to October 2<sup>nd</sup> for a press rebuild project. We anticipate some start up issues out of this large project that may affect running at or above the reference level for the month of October which is why we would need to test prior to September. Stack testing in late fall is problematic and not recommended as colder, icy weather conditions can make it dangerous outside especially when climbing ladders.

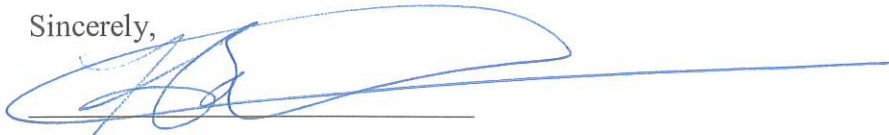
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Therefore, providing the reduced operating schedule and market uncertainty directly related to COVID-19, the International border crossing restrictions, along with the reduced opportunity for testing in the fall given the curtailment associated with the press rebuild, please consider our request to postpone stack testing until 2021.

Should you have questions please don't hesitate to call.

Sincerely,



Kevin Betcher  
Plant Manager, Swan Valley Siding

Cc: Al Hambley, Corporate Environmental Operations Manager  
Lyle Sagert, Plant EHS Manager  
Eshetu Beshada, Environmental Engineer

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