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November 24, 2015

Ms. Tracy Braun
Director, Environmental Approvals
Manitoba Conservation
Suite 160, 123 Main Street, Box 80
Winnipeg, MB R3C 1A5

Dear Ms. Braun:

## RE: NOTICE OF ALTERATION APPLICATION - WINPAK LTD.

We are providing a Notice of Alteration pursuant to Section 14(1) of the Environment Act (The Act). Winpak was granted Licence No. 2797 on December 17, 2007 for their packaging manufacturing plant located in Murray Industrial Park in Winnipeg.

The Environment Act states that a notice of alteration must be filed where a proponent:

"(b) has received an environmental licence for a development;

and the proponent intends to alter that proposal or the development as licensed that does not conform to the limits, terms and conditions or that is likely to change the environmental effect, the proponent shall notify the director or the minister, as the case may be, of the proposed alteration before proceeding with it."

It is our interpretation of The Act that a notice of alteration must be filed if the proponent makes alterations that will result in a change to its emissions to the environment. The proposed changes outlined below could result in new emissions. It is our belief however that the changes are minor in nature and will be neutral or in fact may be beneficial in terms of environmental emissions.

### Recent Changes to Winpak Processes

- 1. Since the last "Notice of Alteration" dated June 19, 2013, Winpak has slightly rearranged the equipment layout within the facility. We are providing a revised plant layout dated November 13, 2015. There is no change to the building footprint itself.
- 2. We have added one new slitter (slitter # 19). This machine does not emit any VOC's to the environment.





3. The production equipment shut down are one blown film extrusion line (EC1) and one solvent based laminate (Polytype laminator), these two machines are schedules to be removed from our plant in 2016.

#### Proposed Alteration with Minimal Emissions

- The change proposed to the film production area involves the addition of a new Multibarrier 4 machine. The process for this machine does not emit VOC's to the Environment. The location of the new machine is highlighted on the revised plant layout.
- 2. New exhaust equipment will be added to remove heat from the extruders into the atmosphere.

#### Summary

We believe that the foregoing alteration should be classified as a minor alteration as set out in Section 14(2) and request that you will give approval to the proponent to implement the alteration as planned.

Should you require any further information or clarification please contact the writer.

Yours truly,

Doug Halowski

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Safety & Environmental Coordinator

Winpak Ltd.

Attachments

# **Plant Layout - Environmental License**

