

February 3, 2023

James Capotosto, Director, Environmental Approvals Branch

1007 Century Street, Winnipeg, Manitoba R3H 0W4

RE:

Client File No: 5767.00 Facility Name: Notice of Alteration, Graphic Packaging International Canada, ULC Located at 531 Golspie Street, Winnipeg, Manitoba R2K 1K9 Environment Act Licence: 3152

Dear Sir:

I am writing you today to inform you that we are purchasing a new printing press to replace another aging press at our 531 Gospie Street location here in Winnipeg. The expected delivery is anticipated to be March 20, 2023. As this a replacement press, I would like to confirm with you if there is any updating of our **Environmental Act License No. 3152 required** at this time and or in the future.

We are providing the Notice of Alteration Form and detailed report of the equipment upgrade & floor redesign planned for our manufacturing operations located at 531 Golspie Street Winnipeg Manitoba.

No changes to the terms of our existing environment act licence are proposed. We are not including the Alteration fee with our notice of Alteration as it is believed to be an insignificant alteration based on the Criteria described in the Information Bulletin – Alterations to Development with Environment Act Licences for equipment replacement that does not change the environmental effects. If the fee is deemed necessary payment will be arranged.

If you have any questions in order for you to advise us on any required amendment to our Environmental Act License, please call me on my cell 204-229-3699 or email at <u>il.desautels@graphicpkg.com</u>

Sincerely.

Jean-Louis (JL) DesAutels Plant Manager Graphic Packaging International Canada, ULC (204) 667-6600 Ext 663

Cc: Robert Beal, CRSP GPI Cc: Marguerite Reimer, M.Sc. Environment Officer

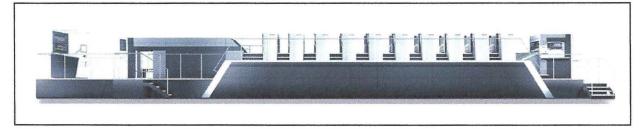
Notice of Alteration Form



File No. :	5767.00	Environment Act Licence No.: 3152				
Legal name of the Licencee: Graphics Packaging International Canada, ULC						
Name of the development:						
Category and T	ype of development	per Classes	s of Deve	lopment Regulation:		
Manufacturin	g		Manufacturing and industrial plants			
Licencee Cont	Robert	Beal, CRS	SP	nation and a sold of the tage of a sold of the tage of the sold of		
Mailing addres	Mailing address of the Licencee: 531 Golspie Street					
City: Winnipeg Province: M			Manitoba	Postal Code:	R2K 2T9	
Phone Numbe	er: (204) 667-6600	Fax:		Email: robert.beal	@graphicpkg.com	
Name of proponent contact person for purposes of the environmental assessment (e.g. consultant): n/a						
Phone:		N	lailing ad	dress:		
Fax:						
Email address	S:		alary ini com			
Short Descript	tion of Alteration (ma	x 90 charac	cters):	an a		
Installation of a new Heidelberg XL106-7+LX3 Printing Press						
Alteration fee attached: Yes: No: 🗸						
If No, please explain: Believed to meet insignificant alteration criteria.						
Date: 2023-0	2-03	Signature	e:			
		Printed na	ame: Jea	an-Louis (JL) DesA	utels	
A complete Notice of Alteration (NoA) consists of the following components:				Submit the complete NoA to: Director, Environmental Approvals Branch Manitoba Conservation and Climate		ovals Branch
☑ Notice of Alteration Form			1007 Century 3 Winnipeg, Man			4
✓ 1 hard copy and 1 electronic copy of the NoA			EABDirector@			
detailed report (see "Information Bulletin - Alteration to Developments			Formersinfer	motion		
with Environment Act Licences")		ces")		Phone: (204) 94	For more information: Phone: (204) 945-8321 Fax: (204) 945-5229	
□ \$500 Application fee, if applicable		plicable (C	Cheque,	https://www.go	A REAL PROPERTY AND A REAL PROPERTY AND A REAL PROPERTY.	
payable to the Minister of Finance)		inance)		permits license	es approvals/ea	al/licence/index.html
Note: Per Section 14(3) of the Environment Act, Major Notices of Alteration must be filed through submission of an Environment Act Proposal Form (see "Information Bulletin – Environment Act Proposal Report Guidelines")						



Notice of Alteration Request: Detailed report GRAPHIC PACKAGING INTERNATIONAL CANADA -EQUIPMENT UPGRADES & FLOOR PLAN REDESIGN –



JANUARY 2023

RE: Client File No: 5767.00

Facility Name: Graphic Packaging International Canada, ULC Located at 531 Golspie Street, Winnipeg, Manitoba R2K 2T9 Environmental Act License: 3152

The following report details the Environmental aspects and impacts of the planned equipment upgrade and floor plan redesign to be completed in the 2023 calendar year.

Equipment changes

GPI's gross printing production has grown in recent years from 77,000,000 printed sheets in 2014 to a value of 83,575,454 total printed sheets in 2021 and a forecasted total of 101,737,680 sheets in 2024 and beyond. GPI Winnipeg is purchasing a new *Heidelberg XL106-7+LX3* printing press to replace an aging *9230 Planeta B* printing press that will be permanently decommissioned and removed from our production facility. We have also removed a Pattern Waxer, Cello carton processing equipment, and a CO2 laser cutter to accommodate the new printing press as described herein.

The new *Heidelberg XL106-7+LX3* printing press technology and efficiencies, allow GPI to decommission the *9230 Planeta B* press and store *Heidelberg A* in place for emergency situations and future potential capacity requirements. *Heidelberg XL106-7+LX3* is expected to represent 60% of the printing throughput once fully operational. *9240 Heidelberg C* will remain



and continue operation as normal. Budgeted 2023 production reflects 2 printing presses (operating 7 days/week). Current state; 3 printing presses (one operating 5 days/week and two operating 7 days/week) to meet demand.

There are no anticipated changes the type of hazardous waste generated. In terms of Hazardous waste volume, it is anticipated, volume will be reduced in future years due the to the increased efficiencies of the new **Heidelberg XL106-7+LX3** printing press. This anticipated volume reduction can't be determined as the manufacture is not able to provide data for a proper estimation.

The expected delivery and the start of installation of the new **Heidelberg XL106-7+LX3** is May 04, 2023, with an expected production startup June 19, 2023.

Floor Plan Redesign

As shown in Appendix A the current plant floor layout depicts:

- #1 Carton Gluers to be relocated to the Southeast side of the plant to accommodate the new *Heidelberg XL106-7+LX3* press
- #2 The existing 9230 Planeta B press will be decommissioned and removed by end of 2023.
- #3 Pattern Waxer processing equipment was decommissioned and removed from the production facility on November 22, 2022. (No environmental impact.)
- #4 Right Angle carton gluer to be relocated to the north central area of the plant to accommodate the new Heidelberg XL106+LX3 printing press. (No environmental impact.)
- #5 Cello carton processing equipment was decommissioned and removed from the production facility November 22, 2022. (No environmental impact)
- #6 CO₂ laser cutting equipment was decommissioned and removed from the production facility July 22, 2022. (No environmental impact)

As shown in **Appendix B** future plant floor layout depicts:

- #1 Carton Gluers relocated from the Southwest to the Southeast side of the plant. Completed December 16, 2022. (No environmental impact)
- #2 Installation location of the new *Heidelberg XL106-7+LX3* printing press in the Southwestern area of the production floor along south external wall of the plant, scheduled installation beginning May 4, 2023.



 #3 Right Angle carton gluer relocated to the North central area of the plant December 2, 2022. (No environmental impact)

New Heidelberg XL106-7+LX3 printing press accessory equipment.

The *Heidelberg XL106-7+LX3* printing press will be equipped with an exterior roof mounted fluid cooling system DC 81 35 (40) as shown in Appendix C and one helper fan system for the removal of heat from the printing press as shown in Appendix E.

In consideration of the noise exposure on the surrounding residential community 200 meters west from the roof installation location, an assessment of the equipment noise output and sound level in dB has been completed. GPI has no previous noise complaints and is in good standing with local residents.

The assessment results for the roof mounted cooling system indicate insignificant noise impact to the residential community based on the supplied specification information for the equipment considering the distance to the nearest residential land as calculated and shown in Appendices D and E:

- Appendix D shows the specified noise emissions from the Fluid Cooler equipment (Appendix C) and calculated sound pressure level at a distance of 200 m from the source, equivalent to the distance from the source to the nearest residential community area border being Golspie Street. The fluid cooler equipment is estimated to create a sound exposure of 31.0 dB at a distance of 200 m.
- Appendix E shows the noise emissions from the additional exhaust fans, and calculated sound pressure level of 20.6 dB at a distance of 200 m, to represent the noise effect of the exhaust fans on the surrounding residential community.

Air emission/VOC assessment impacts

Clause 10 of GPI's existing Environment Act License 3152 requires annual VOC emission reporting to the Director of the Environment Act. There are no changes proposed to this clause and GPI will continue to provide the required information as previously report in prior years. A forecast of the VOC emissions, based on average emissions and production rates is provided as information below:

Appendix F details the gross production of printed sheets for each of the current existing printing presses, corresponding to the generated VOC emission levels reported in previous



annual emission reporting. VOC emissions are related to gross printing production (gross sheets printed, 93,076,340 sheets in 2020 and 83,575,454 sheets in 2021) and the calculation used to determine the amount of VOC per printed sheet is communicated in Appendix F.

With the following changes:

- New *Heidelberg XL106-7+LX3* printing press planned output of printed sheets being produced on a 7/24 production schedule in:
 - 2023 is anticipated to be 33,645,139 gross printed sheets and
 - 2024 is anticipated to be 60,000,000 gross printed sheets.
- **9270 Heidi A** printing press will be scheduled only for emergency production equipment break down coverage or production run upsets and its' gross printed sheets per year is being estimated to be 21,084,300 gross printed sheets in 2023.
- **9230 Planeta B** printing press is scheduled for decommissioning and removal from our facility in 2023; it is estimated to still produce 7,679,610 printed sheets before its' removal.

2023

With the New **Heidelberg XL106-7+LX3** printing press planned for integration into the Winnipeg plant facility operations, the decommissioning of the **9230 Planeta B** printing press over a period in 2023 and the non-scheduling of production on the **9240 Heidi A** printing press only during equipment break down or production run upsets, the following been concluded:

 Based on the average emission value calculated to be 0.00027 Kilograms of VOC's per printed sheet from the total gross printed sheet from emission years 2020 and 2021 the annual projected sheet production for 2023 is estimated to release 21,558 Kilograms of VOC'S, an 12.46 % increase over the 19,170.40 kilograms of VOC's released in 2020 and an 24.03 % increase over the 17,381.40 Kilograms of VOC's reported for 2021.

2024

Upon completion of printing press equipment replacement, the following has been concluded:

 Based on the average emission value calculated to be 0.00027 Kilograms of VOC's per printed sheet from the total gross printed sheet from emission years 2020 and 2021 the annual projected sheet production for 2024 is estimated to release 21,060 Kilograms of VOC'S, an 9.86% increase over the 19,170.40 kilograms of VOC's released in 2020 and an 21.16% increase over the 17,381.40 Kilograms of VOC's reported for 2021.



The companies Emergency response contingency plan will be updated to include the planned new, removed and relocated equipment.

In our examination of the various environmental aspects of the propped new equipment replacement project and it's determined effects of VOC, noise pollution and hazardous waste volumes for estimated production volumes past the 2023 transition year producing an estimated annual emission of 21,060 Kilogram of VOC's and increase of 9.86 % over the 2020 reported emissions of 19,170.4 Kilogram. We don't propose any changes to the terms of our existing environment act license in our deamination of the effects we reasonably conclude them not being significant.

Jean-Lousis (JL) DesAutels Plant Manager

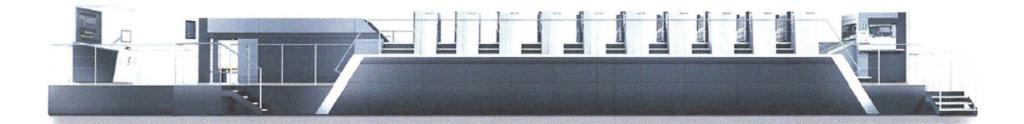
531 Golspie St. Winnipeg, MB R2K 2T9

204-667-6600 Ext 663



GPI WINNIPEG

EQUIPMENT UPGRADES & FLOOR PLAN REDESIGN – 2023 APPENDIXES A-F



Appendix A CURRENT PLANT FLOOR LAYOUT IN 2022

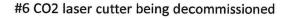
#1 Carton Gluers to be relocated to Southeast side of plant

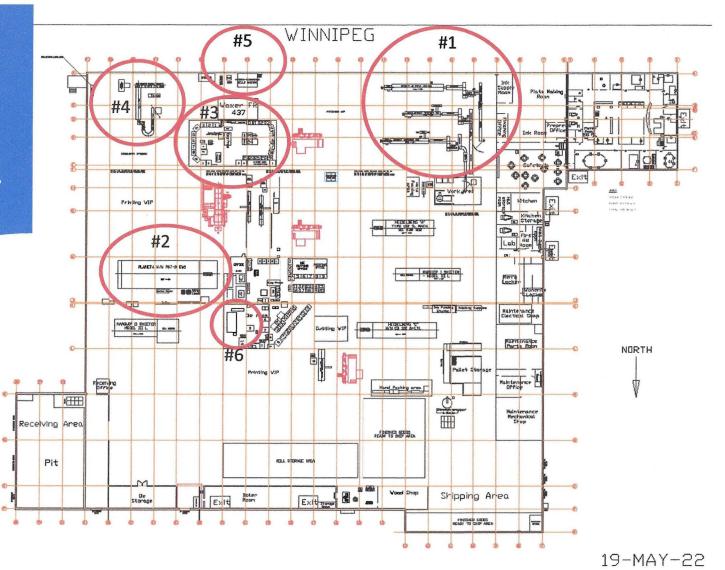
#2 Planeta Printing press being decommissioned

#3 Waxer equipment being decommissioned

#4 Right angle gluer to be moved North central in the plant

#5 Cello packaging equipment decommissioned



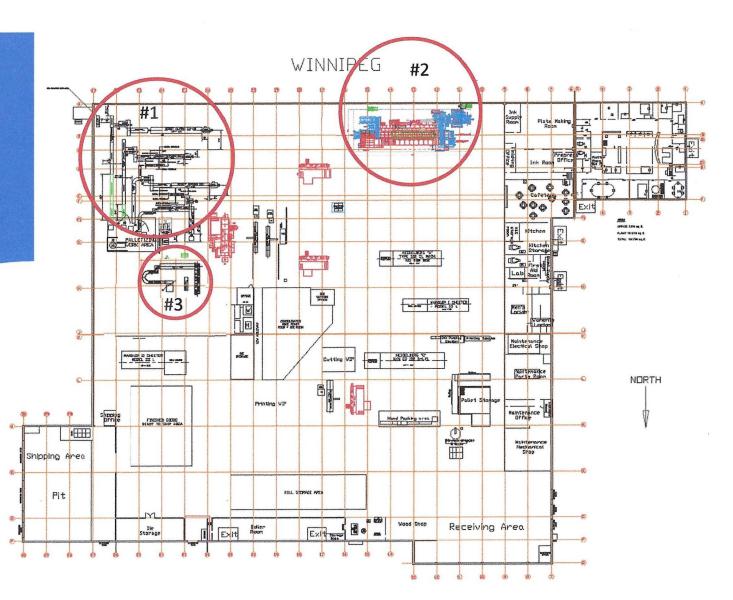


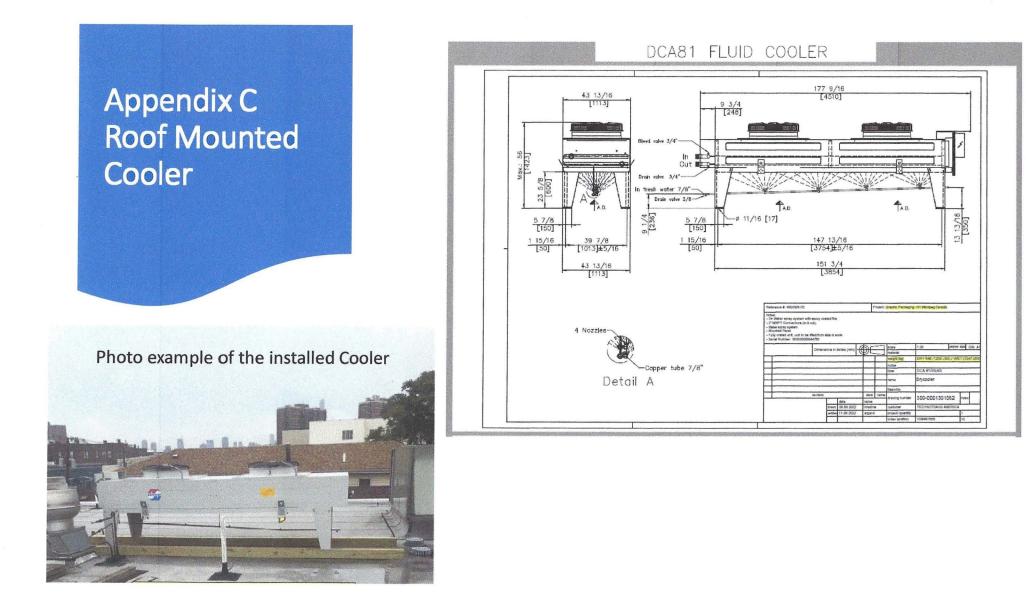
Appendix B FUTURE PLANT FLOOR LAYOUT IN 2023

#1 Gluer equipment relocated to southeast corner of plant

#2 New Heidelberg printing press installed in the southcentral area of the plant

#3 Right angle carton gluer to be relocated to the North central area of the plant







Proposed cooler specifications and noise emissions

technotrans america, inc. DCA 81 35/(40) FLUID COOLER tta P/N: 10076196

Drycooler	DCA 81 35/(40)		
Capacity:	81.0 kW	Medium:	Ethylene glycol 40 Vol
Surface reserve:	8.0 %	Inlet:	47.0 °C
Air flow:	38600 m³/h	Outlet:	40.0 °C
Air velocity:	2.5 m/s		
Air inlet:	35.0 °C	Pressure drop:	0.55 bar
Altitude:	0 m	Volume flow (current/max):	11.00 / 14.38 m ³ /h
Heat transf. coeff	.: 34.83 W/(m²·K)	Mass flow:	11613 kg/h
Fans:	2 Piece(s) 3~460V 60HzY/()	Fan diameter:	800 mm
Data per motor (n	ominal data):	Noise pressure level:	57 dB(A)
Speed:	1070 min-1 / ()	at a distance of:	10.0 m
Capacity:	1.75 kW, 2 hp mech.		
Current:	3.30 A		
Casing:	Galv. Steel, light grey	Tubes:	Copper ⁽¹⁾
Surface:	489.7 m ²	Fins:	Epoxy ⁽¹⁾
Tube volume:	62.71	Connections per unit:	
Fin spacing:	2.40 mm	Inlet:	2 1/8 in
Dry weight:	521 kg ⁽²⁾	Outlet:	2 1/8 in
Max. operating pr	essure: 16.0 bar		
Dimensions:(2)			
Length:	4170 mm	Outlet header:	2 1/8 in
Width:	1113 mm	Inlet header:	2 1/8 in
Height:	1500 mm ⁽²⁾	Face Area:	4.2 m ²
No. of legs:	4	Circuits:	1N
		Distributions:	22

At a distance of 10

meters, sound pressure level (SPL) is 57

dB. Then the sound pressure level at 200

meters, is 31.0 dB.

Appendix E **Roof Mounted Heat Helper Exhaust Fan Specifications**



ACE-B

Downblast Centrifugal **Exhaust Ventilator**

Roof Mounted/Belt Drive STANDARD CONSTRUCTION FEATURES:

Performance ("Bro includes \$% drive loss)

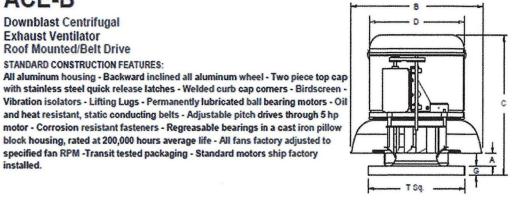
and heat resistant, static conducting belts - Adjustable pitch drives through 5 hp

block housing, rated at 200,000 hours average life - All fans factory adjusted to specified fan RPM -Transit tested packaging - Standard motors ship factory



MARK: 31.1 BELT PROJECT: CHAD TO DMS HELPER FANS DATE: 12/5/2022

Dimensions (inches)



Catalog Flow SP Fan Power*	A 3-1/16	i l
Gty Number (CFM) (Inwc) RPM (HP) FEG	B 32-7/8	ŝ
1 150C68 1412 1.00 1245 .406 n/a(<1HP)	C 28-7/5	3
Altitude (ft): 784 Temperature (F): 70	D 23-3/4	l l
Motor Information	G 2	1
HP RPM Volts/Ph/Hz Enclosure FLA Mounted	T \$q. 24]
3/4 1725 575/3/6D ODP -SE 1.3 Yes	Roof Open.Sq.* 19-1/2	1
FLA based on NEC (2017) Table 430 250	NOTE. Accessories may affect dimen	as the company of the company of the company
Sound Data Inlet Sound Power by Octave Band	Weight(Iba)*** Shipping	
1 2 3 4 5 6 7 8 LWA dBA Sones	Head appending such for such supplied "Technike for, cooler & economics	
75 77 80 70 66 64 58 54 74 63 12.5		
- Distance from Sound source 5 ft		
]	
At a distance of 1.524 meters, sound pressure level (SPL) is 63 dB. Then the sound pressure level at 200	meters, is 20	.6 dB.

installed.

Output comparison - History & Future years estimate 2020 - 2024

2020	Sum of Gross Qty annual printed sheets	VOC Emissions (KG) per total printer sheets = printed sheets x .000206 KG per sheet	Operation schedule	
9230 Planeta B	18,826,541	3,878	5 Day	
9240 Heidi C	42,849,783	8,826	7 Day	
9270 Heidi A	31,400,016	6,467	7 day	
	93,076,340	19,170		
2021	Sum of Gross Qty annual printed sheets	VOC Emissions (KG) per total printer sheets = printed sheets x .000208 KG per sheet	Operation schedule	
9230 Planeta B	15,028,641	3,126	S Day	
9240 Heidi C	41,702,454	8,673	7 day	
9270 Heidi A	26,844,359	5,583	7 day	
	83,575,454	17,381		
2022	Sum of Gross Qty annual printed sheets		Operation schedule	
9230 Planeta B	n/a	n/a	5 Day	
9240 Heidi C	n/a	n/a	7 day	
9270 Heidi A	n/a	n/a	7 day	
Not available at time of data tabulation	n/a	n/a		
2023 Transition year	Est.Sum of Gross Qty annual printed sheets	VOC Emissions (KG) per total printer sheets = printed sheets x .000207 KG per sheet (2 year avg)	Operation schedule	
New Helderburg	33,645,139	6,965	7 days Operational start up June 2023	
9240 Heidi C	41,737,680	8,640	7 day in 2023	
9270 Heidi A	21,084,300	4,364	Scheduled if required-Back up use in future	
Planeta B	7,679,610	1,590	5 Day to End of operations May 2023	
Total planned Est. sheets printed 2023	104,146,729	21,558		
2024	Est.Sum of Gross Qty annual printed sheets	VOC Emissions (KG) per total printer sheets = printed sheets x .000207 KG per sheet (2 year avg)	Operation schedule	
New Helderburg	60,000,000	12,420	7 days	
9240 Heidi C	41,737,680	8,640	7 days	
9270 Heidi A	-	-	Scheduled if required-Back up use in future	
Total planned Est. sheets printed 2023	101,737,680	21,060	Total planned sheets printed 2024	

Appendix F