



Environment, Climate and Parks
Environmental Approvals Branch
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File No.: 3741.10

March 14, 2022

Kevin Betcher, Plant Manager
Louisiana Pacific - Swan Valley Siding
P.O. Box 189
Minitonas, MB R0L 1G0
Kevin.Betcher@lpcorp.com

Dear Kevin Betcher:

Re: Environment Act Licence No. 2954 RRR

Enclosed is the revised Environment Act Licence No. 2954 RRR, issued to Louisiana Pacific pursuant to the notice of alteration approved on May 26, 2021. The licence is for the continued operation of the development, being an Oriented Strand Board and insecticide-impregnated siding product manufacturing plant, located on the East half of Section 16, Township 36, Range 25 WPM in the Rural Municipality of Minitonas.

The facility operates in accordance with the Environment Act Proposal submitted on May 5, 1994 and subsequent alteration; the revised Environment Act Proposal submitted on January 19, 2009 and the additional information submitted on July 3, 2009; the notices of alteration dated June 12, 2015 and April 23, 2021; and subject to the specifications, limits, terms and conditions included in the enclosed licence.

In addition to the enclosed licence requirements, please be informed that all other applicable federal, provincial and municipal regulations and by-laws must be complied with. A notice of alteration must be filed with the director for approval prior to any alteration to the development as licensed.

Should you have any questions regarding this approval, please contact Kristy Forrestall, Regional Supervisor, Environmental Compliance and Enforcement Branch, at Kristy.Forrestall@gov.mb.ca or 204- 573-0518.

This licensing decision may be appealed by any person who is affected by the issuance of this licence to the Minister of Conservation and Climate within 30 days of the date of the licence, pursuant to section 27 of The Environment Act.

Sincerely,

Original Signed by

Laura Pyles
The Environment Act

Enclosure

- c. Kristal Harman, Yvonne Hawryliuk, Kristy Forrestall - Environmental Compliance and Enforcement
Siobhan Burland Ross, Eshetu Beshada - Environmental Approvals
Public Registry

LICENCE

File No.: 3741.10

Licence No. / Licence n°: 2954 RRR
Issue Date / Date de délivrance : March 24, 2011
Revised : December 21, 2011
Revised : July 14, 2015
Revised : March 14, 2022

In accordance with The Environment Act (C.C.S.M. c. E125) /
Conformément à la Loi sur l'environnement (C.P.L.M. c. E125)

Pursuant to Section 11(1) and 14(2)/ Conformément au Paragraphe 11(1) et 14(2)

THIS LICENCE IS ISSUED TO:/CETTE LICENCE EST DONNÉE À:

LOUISIANA-PACIFIC CANADA LTD.: "the Licensee"

for the continued operation of the Development, being an Oriented Strand Board and insecticide-impregnated siding product manufacturing plant located on the East half of Section 16, Township 36, Range 25 WPM, excepting that portion taken for the right-of-way of the Canadian National Railway, in the Rural Municipality of Minitonas, pursuant to The Environment Act Proposal submitted on May 5, 1994, and altered on June 28 and September 9, 1994, February 9, April 25, October 2 and October 11, 1995, May 14, 1996, and April 21, 1997, and pursuant to the revised Environment Act Proposal submitted on January 19, 2009 and the additional information submitted on July 3, 2009; the Notices of Alterations dated June 12, 2015 and April 23, 2021; and subject to the following specifications, limits, terms and conditions:

DEFINITIONS

In this Licence,

"accredited laboratory" means an analytical facility accredited by the Standards Council of Canada (SCC), or accredited by another accrediting agency recognized by Manitoba Environment, Climate and Parks to be equivalent to the SCC, or be able to demonstrate, upon request, that it has the quality assurance/quality control (QA/QC) procedures in place equivalent to accreditation based on the international standard ISO/IEC 17025, or otherwise approved by the Director;

"affected area" means a geographical area, excluding the property of the Development;

"approved" means approved by the Director, or an assigned Environment Officer, in writing;

"days" means calendar days unless otherwise indicated;

"Director" means an employee so designated pursuant to The Environment Act;

"E-tube" means a trademark wet electrostatic precipitator by Geoenergy International Corporation;

"effluent" means treated wastewater flowing or pumped out of the wastewater treatment lagoon or run-off retention pond;

"Environment Officer" means an employee so designated pursuant to The Environment Act;

"ESP" means electrostatic precipitator;

"failure" means either an event or series of events where a piece of equipment is not operating or is operating outside the normal operating range for any parameter and which may result in the release of a pollutant in excess of any specification, limit, term, or condition of this Licence, or the omission of an action described in the approved contingency plan or detailed inspection and maintenance plan which may result in the non-detection of a release of a pollutant in excess of any specification, limit, term, or condition of this Licence;

"fecal coliform" means aerobic and facultative, Gram-negative, nonspore-forming, rod-shaped bacteria capable of growth at 44.5°C, and associated with fecal matter of warm-blooded animals;

"five-day biochemical oxygen demand" means that part of the oxygen demand usually associated with biochemical oxidation of organic matter within five days at a temperature of 20°C;

"fugitive dust emissions" means particulate matter escaping from sources within the plant property into the atmosphere other than through any of the emission stacks or vents;

"grab sample" means a single sample taken at a given place and time;

"hazardous waste" means a product, substance or organism as defined in The Dangerous Goods Handling and Transportation Act, or any amendments thereto;

"high water mark" means the line on the interior surface of the primary and secondary cells which is normally reached when the cell is at the maximum allowable liquid level;

"low water mark" means the line on the interior surface of the primary and secondary cells which is normally reached when the cell is discharged;

"MDI" means Diphenyl Methane Diisocyanate;

"MPN Index" means the most probable number of coliform organisms in a given volume of wastewater which, in accordance with statistical theory, would yield the observed test result with the greatest frequency;

"90th percentile" means the statistically derived value that equals to the quantity produced or consumed daily by a component of the Development, that was exceeded on 10 percent of the days that the component of the Development operated in the year;

"noise nuisance" means an unwanted sound, in an affected area, which is annoying, troublesome, or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or
- c) present at a location in an affected area which is normally open to members of the public; if the unwanted sound
- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director and within a 90-day period, from 5 different persons falling within clauses a), b) or c), who do not live in the same household; or
- e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses a), b) or c) and the Director is of the opinion that if the unwanted sound had occurred in a more densely populated area there would have been at least 5 written complaints received within a 90-day period, from 5 different persons who do not live in the same household;

"odour nuisance" means a continuous or repeated odour, smell or aroma, in an affected area, which is offensive, obnoxious, troublesome, annoying, unpleasant, or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or
- c) present at a location in an affected area which is normally open to members of the public; if the odour, smell or aroma
- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director and within a 90-day period, from 5 different persons falling within clauses a), b) or c), who do not live in the same household; or
- e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses a), b) or c) and the Director is of the opinion that if the odour, smell or aroma had occurred in a more densely populated area there would have been at least 5 written complaints received within a 90-day period, from 5 different persons who do not live in the same household;

"opacity" means the degree to which emissions reduce the transmission of light and obscure the view of an object in the background;

"particulate matter" means any finely divided liquid or solid matter other than water droplets;

"particulate residue" means that part or portion of an atmospheric emission which is deposited onto a surface;

"ponding" means the surface retention of water or liquid for a period of time sufficient to allow infiltration of the water or liquid below the soil surface, excluding riprap, to a depth in excess of 10 centimetres;

"primary cell" means the first in a series of cells of the wastewater treatment lagoon system and which is the cell that receives the untreated wastewater;

"recyclable material" means a waste that is intended for reuse, recovery or recycling but does not include a product, substance or organism that is intended to be:

- a) applied into or onto land, or
- b) disposed of in a thermal destruction process;

"reference level" means the rate, as the average tons per hour, of production or consumption that equals the value of the 90th percentile of the daily production or consumption by a component of the Development over the previous year;

"riprap" means small, broken stones or boulders placed compactly or irregularly on dykes or similar embankments for protection of earth surfaces against wave action or current;

"secondary cell" means a cell of the wastewater treatment lagoon system which is the cell that receives partially treated wastewater from the primary cell;

"sodium absorption ratio (SAR)" means the dimensionless value where:

$$\text{SAR} = \frac{0.044 \times \text{Sodium concentration}}{\sqrt{(0.025) \text{ Calcium concentration} + (0.041) \text{ Magnesium concentration}}};$$

"stack" means a structure through which air pollutants generated at the Development are conveyed to the atmosphere:

"total coliform" means a group of aerobic and facultative anaerobic, Gram-negative, nonspore-forming, rod-shaped bacteria, that ferment lactose with gas and acid formation within 48 hours at 35 °C, and inhabit predominantly the intestines of man or animals, but are occasionally found elsewhere and include the sub-group of fecal coliform bacteria;

"total particulate matter (TPM)" means the total of both the condensable and non-condensable particulate matter;

"trained observer" means a person who attended approved field determination of opacity training within the preceding year;

"volatile organic compound (VOC)" means any organic compound which participates in atmospheric photochemical reactions, excluding methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides and carbonates, ammonium carbonate, and other compounds which may be exempt by the Director; and

"wastewater treatment lagoon" means the component of the Development which consists of an impoundment into which wastewater is discharged for storage and treatment by natural oxidation.

GENERAL TERMS AND CONDITIONS

This section of the Licence contains requirements intended to provide guidance to the Licensee in implementing practices to ensure that the environment is maintained in such a manner as to sustain a high quality of life, including social and economic development, recreation and leisure for present and future Manitobans.

1. The Licensee shall maintain at all times a copy of this licence at the Development or at the premises from which the Development's operations are managed.
2. The Licensee shall implement a high standard of equipment maintenance and good housekeeping and operational practices with respect to the Development, at all times.
3. The Licensee shall reduce the production and dissemination of wastes by initiating and maintaining waste reduction and waste recycling programs.
4. In addition to any limits, terms and conditions specified in this Licence, the Licensee shall, upon the request of the Director:
 - a) sample, monitor, analyze and/or investigate specific areas of concern regarding any segment, component or aspect of pollutant storage, containment, treatment, handling, disposal or emission systems, for such pollutants or ambient quality, aquatic toxicity, leachate characteristics and discharge or emission rates, for such duration and at such frequencies as may be specified;
 - b) determine the environmental impact associated with the release of any pollutant(s) from the Development;
 - c) conduct specific investigations in response to the data gathered during environmental monitoring programs; or
 - d) provide the Director, within such time as may be specified, with such reports, drawings, specifications, analytical data, descriptions of sampling and analytical procedures being used, bioassay data, flow rate measurements and such other information as may from time to time be requested.
5. The Licensee shall, unless otherwise specified in this Licence:
 - a) carry out all preservations and analyses on liquid samples in accordance with the methods prescribed in the most current edition of Standard Methods for the Examination of Water and Wastewater or in accordance with equivalent preservation and analytical methodologies approved by the Director;
 - b) carry out all sampling of, and preservation and analyses on soil, compost, and air samples in accordance with the appropriate Schedule attached to this Licence or with methodologies approved in advance for those variables for analyses not listed in a Schedule;
 - c) carry out all sampling of, and preservation and analyses on solid samples in accordance with methodologies approved in advance;
 - d) have all analytical determinations undertaken by an accredited laboratory; and
 - e) report the results to the Director, in writing and in an electronic format acceptable to the Director, within 60 days of the samples being taken.

6. The Licensee shall have all monitoring activities, data collection and interpretations requested through the provisions of this Licence carried out by individuals properly trained or qualified to carry out these tasks.
7. The Licensee shall submit all information required to be provided to the Director or Environment Officer under this Licence, in written and electronic format, in such form (including number of copies), and of such content as may be required by the Director or Environment Officer, and each submission shall be clearly labelled with the Licence Number and File Number associated with this Licence.
8. The Licensee shall, as deemed necessary by the Director for effective environmental management, carry out any remedial measures, modifications, or alterations in respect to matters authorized under this Licence.
9. The Licensee shall participate on a Community Liaison Committee established by the Director for the purpose of facilitating the exchange of information between the residents of the Swan River Valley and the Licensee, and shall, as deemed necessary by the Director, provide the Community Liaison Committee with information relating to the construction, operation and monitoring activities and such other matters authorized by this Licence including proposed amendments to operating, monitoring, or disposal plans.
10. The Licensee shall cooperate with and/or conduct any health studies deemed necessary by the Director and Manitoba Health.
11. The Licensee shall designate an employee, within 60 days of the date of issuance of this Licence, as the Licensee's Environmental Coordinator, whose job description will include assisting the Licensee in complying with the limits, terms and conditions in this Licence and assisting Senior Management of Louisiana-Pacific Canada Ltd. – Swan Valley Plant to manage environmental issues at the Development. The name of the Environmental Coordinator shall be submitted in writing to the Director within 14 days of appointment and any subsequent appointment.

SPECIFICATIONS, LIMITS, TERMS AND CONDITIONS

Respecting Monitoring and Reporting

12. The Licensee shall provide a stack or stacks at any area of the Development including all necessary sampling facilities for the sampling of air emissions at the Development. The stack or stacks shall be provided:
 - a) at a location(s) and within a time frame satisfactory to the Director; and
 - b) to the specifications and in accordance with the most recent version of Manitoba Environment, Climate and Parks Guideline, *Guideline for Stack Sampling Facilities*, unless otherwise approved by the Director.
13. The Licensee 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 starting in 2022 and every two years thereafter.

14. The Licensee, at least 60 days prior to performing stack sampling as required by Clause 13 of this Licence, shall submit a detailed plan which is acceptable to and approved by the Director, for the sampling and analysis of potential air pollutants, released as stationary point and fugitive emissions. The plan shall identify the rationale for the sampling; the ways and means by which the sampling program will be implemented including any special measures or methods which would be necessitated by influencing factors such as unfavourable weather conditions, the need for large or additional sample volumes, the need for multiple sampling runs; the methods used for the sampling and the analysis for each compound; the detection level to be attained; a comprehensive QA/QC program, and other items as may be identified by the Director.
15. The Licensee shall perform all stack sampling in accordance with the most recent version of Manitoba Environment, Climate and Parks Report No. 96-07, *Interim Stack Sampling Performance Protocol*, unless otherwise approved by the Director.
16. The Licensee shall arrange the scheduling of the sampling program, approved pursuant to clause 14 of this Licence, such that a representative of Manitoba Environment, Climate and Parks is available to monitor and audit the implementation of the sampling program.
17. The Licensee, within 60 days of the receipt of the analytical results of the sampling program approved pursuant to Clause 14 of this Licence, shall submit a report for the approval of the Director containing at minimum:
 - a) the raw data collected;
 - b) a discussion of the sampling and analytical portions of the program including any anomalies of sampling and analysis; and
 - c) a discussion of the significance of the data gathered with specific attention to:
 - i) the significance for potential acute and chronic impacts to health or environment from exposure to concentrations of the compounds detected;
 - ii) the need for risk assessment of the impact of emissions;
 - iii) the need for the establishment of ambient air monitoring stations;
 - iv) the need for dispersion modeling of emissions;
 - v) results and conclusions of the QA/QC program; and
 - vi) other issues as may be determined by the Director.
18. The Licensee shall conduct a wastewater treatment lagoon effluent monitoring program and the monitoring program shall, unless otherwise approved in advance:
 - a) continue for such a period of time as is required for 5 separate discharge events to occur;
 - b) include the collection of one grab sample of effluent on the first day and every other day thereafter for:
 - i) the duration of the effluent discharge; or
 - ii) until 15 samples are so collected;
 - c) include the analyses of the grab samples collected for: five-day biochemical oxygen demand, fecal coliform content, total coliform content, electrical conductivity, sodium, calcium, and magnesium;
 - d) include the determination of the SAR of the grab samples collected; and
 - e) determine the environmental impact associated with the release of the wastewater treatment lagoon effluent characterized by the determined SAR.

19. The Licensee shall:
 - a) record and retain the record of the operating parameter information listed in Schedule 5 of this Licence, for a period not less than five (5) years, unless otherwise approved in advance;
 - b) make the records of the operating parameter information listed in Schedule 5 of this Licence, available to an Environment Officer upon request; and
 - c) upon request of the Director, prepare and make a copy available to the Director a report of the operating parameter information listed in Schedule 5 of this Licence.The Licensee may submit, for approval, proposed amendments to Schedule 5. The Licensee shall implement any amendments approved, in a manner and within the time frames specified in the Approval.
20. The Licensee, upon a written request from the Director, shall perform an ambient air quality monitoring for benzene, formaldehyde and MDI, following a methodology approved and for a period to be determined by the Director.
21. The Licensee shall continue implementation of the following:
 - a) an ambient air quality monitoring plan for acrolein as outlined in Schedule 1 attached to this Licence, and following methodology approved by the Director, at the three existing ambient monitoring locations, and the existing meteorological station, until the Director will determine whether to discontinue the program;
 - b) an ambient surface water quality monitoring plan as outlined in Schedule 2 attached to this Licence; and
 - c) a groundwater monitoring plan as outlined in Schedule 3 attached to this Licence.The Licensee may submit, for approval, proposed amendments to the ambient air quality, ambient surface water quality or the groundwater monitoring plans. The Licensee shall implement any amendments approved, in a manner and within the time frames specified in the Approval.
22. The Licensee shall report the results of the ambient air monitoring program within 60 days of the end of each three month sampling period.
23. The Licensee, upon a written request from the Director, shall perform the fauna portion of the flora and fauna study, approved on March 24, 1997, for a period to be determined by the Director.
24. The Licensee shall conduct detailed inspection and maintenance of emission control and monitoring equipment according to the Inspection and Maintenance for Emission Control and Monitoring Equipment Plan approved on November 17, 1995, and shall take action to ensure that all pollutant control and monitoring equipment operate in accordance with design specifications. The Licensee may submit, for approval, proposed amendments to the plan. The Licensee shall implement any amendments approved, in a manner and within the time frames specified in the Approval.
25. The Licensee shall be responsible for payment of costs incurred by the Director or on his or her behalf, deemed by the Director to be necessary for the purpose of:
 - a) monitoring any pollutants for which a limit is prescribed pursuant to the Atmospheric Emission Management Section of this Licence;

- b) reviewing the Licensee's obligation to monitor pursuant to Clause 13 of this Licence or reviewing any other obligations for monitoring imposed on the Licensee pursuant to this Licence; or
- c) determining compliance with any other specification, limit, term, or condition of this Licence.

The information collected as a result of monitoring of any pollutant for which a limit is prescribed in this Licence or while determining compliance with any other specification, limit, term, or condition of this Licence, may be used in evidence in any prosecution for an offense under The Environment Act subject to evidentiary rules as applicable.

26. The Licensee shall inform the Director or Environment Officer of any complaints received related to air emissions or odour emissions from the Development, and shall provide the required notification within 24 hours of receiving a complaint or before noon of the first business day following a complaint on a weekend or statutory holiday. Such notification shall be by facsimile, e-mail or any other notification procedure approved in advance.

Respecting Solid Wastes Management

27. The Licensee shall handle, process, and/or dispose of all wood residuals in a manner that does not allow contamination of groundwater, surface water, or soil.
28. The Licensee shall maintain the ash collection, conveyance, storage and transfer facilities in such a manner so as to prevent:
- a) the contamination of surface water or groundwater;
 - b) the release of fugitive dust emissions from the ash handling facilities beyond the boundary of the property on which the Development is situated; and
 - c) the release of hot ash to nearby combustible materials.
29. The Licensee shall dispose of all ash in an approved manner. The Licensee may submit, for approval, proposed amendments to the disposal method. The Licensee shall implement any amendments approved, in a manner and within the time frames specified in the Approval.
30. The Licensee shall, unless otherwise approved in advance, dispose of all blender waste by incineration in the thermal oil heater system.
31. The Licensee shall maintain the excess bark and wood fines collection, conveyance, and storage facilities in such a manner so as to prevent:
- a) the contamination of groundwater;
 - b) the release of fugitive dust emissions from the excess bark and wood fines handling facilities beyond the boundary of the property on which the Development is situated; and
 - c) combustion of the excess bark or wood fines while being handled or in storage.
32. The Licensee shall dispose of all domestic solid waste generated at the Development, which is not recycled, only to a waste management facility operating under the authority of a permit issued pursuant to Waste Management Facilities Regulation or any future amendment thereof, or a Licence issued pursuant to The Environment Act.

Respecting Liquid Wastes Management

33. The Licensee shall not discharge wastewater from the run-off retention pond without prior approval of an Environment Officer and shall only discharge wastewater from the run-off retention pond in accordance with any instructions issued in the Approval.
34. The Licensee shall maintain the raw log storage area, in a manner acceptable to the Director, with materials and at such slopes so as to prevent ponding and to direct all the runoff water to the runoff collection ditch network.
35. The Licensee shall maintain, in a manner acceptable to the Director, the runoff collection ditch network at such slopes so as to prevent ponding and that directs all the runoff water to the runoff retention pond.
36. The Licensee shall direct all sewage generated at the Development toward the wastewater treatment lagoon or other approved sewage treatment facilities.
37. The Licensee shall not discharge the following substances to the wastewater collection system or the wastewater treatment lagoon:
 - a) hazardous wastes;
 - b) plant and equipment wash water;
 - c) fire control water; or
 - d) water treatment wastewater.
38. The Licensee shall operate and maintain the wastewater treatment lagoon in such a manner that:
 - a) the organic loading on the primary cell, as indicated by the five-day biochemical oxygen demand, is not in excess of 56 kilograms per hectare per day; and
 - b) the depth of liquid in the primary cell or secondary cell does not exceed 1.5 metres.
39. The Licensee shall install and maintain a fence around the wastewater treatment lagoon to restrict access.
40. The Licensee shall, if in the opinion of the Director, significant erosion of the interior surfaces of a wastewater treatment lagoon dyke occurs, repair the erosion and install riprap as necessary. The riprap shall be placed on the interior dyke surfaces from 0.6 metres above the high water mark to 0.6 metres below the low water mark to protect the dykes from wave action.
41. The Licensee shall provide and maintain a vegetation cover on the dykes of the wastewater treatment lagoon and shall regulate the growth of the vegetation on the dykes so that the height of the vegetation does not exceed 0.3 metres.
42. The Licensee shall not discharge effluent from the wastewater treatment lagoon:
 - a) where the organic content of the effluent, as indicated by the five-day carbonaceous biochemical oxygen demand, is in excess of 25 milligrams per litre;
 - b) where the fecal coliform content of the effluent, as indicated by the MPN index, is in excess of 200 per 100 millilitres of sample;

- c) between the 1st day of October of any year and the 15th day of May of the following year; or
- d) where the SAR is in excess of the limit, which limit shall be prescribed by the Director upon completion of a review of the monitoring program results and the environmental impact determined pursuant to Clause 18 of this Licence.

43. The Licensee shall:

- a) dispose effluent by spray irrigation onto land owned by or under control of the Licensee;
- b) only discharge effluent to irrigate:
 - i) actively growing cereal, forage or oil seed crops;
 - ii) grasslands which will not be utilized for grazing:
 - A. by dairy cattle for at least 30 days after effluent is applied; or
 - B. by livestock other than dairy cattle for at least 7 days after effluent is applied;
- c) not harvest agriculture crops for at least 7 days after the crops are irrigated with effluent;
- d) use any corn irrigated with effluent solely for making silage;
- e) not apply effluent to particular lands for more than 10 continuous hours in every 24-hour period; and
- f) if ponding or surface runoff occurs during application, reduce the gross depth of effluent applied during any application of effluent so that ponding or surface runoff does not occur.

44. The Licensee shall not discharge effluent by spray irrigation:

- a) within 300 metres of any dwelling not owned or lawfully controlled by the Licensee;
- b) within 100 metres of any surface watercourse or groundwater well not protected from effluent runoff; or
- c) within 100 metres of any adjoining property boundary, existing as of October 31, 1997.

Respecting Atmospheric Emission Management

45. The Licensee shall prevent the release of fugitive dust emissions beyond the property on which the Development is located.

46. The Licensee shall not emit total particulate matter from:

- a) any source of emission within the Development such that:
 - i) the average of any 24 consecutive opacity observations taken at 15 second intervals exceeds 20 percent;
 - ii) more than 16 individual opacity observations within any 1 hour period exceed 20 percent; or
 - iii) any individual opacity observation exceeds 40 percent; or that
- b) any source of emission within the Development such that a visible particulate residue is deposited, at any time, beyond the boundary of the property on which the Development is situated.

47. The Licensee shall not cause or permit a noise nuisance to be created as a result of the construction, operation, or alteration of the facility, and shall take such steps as the Director may require to eliminate or mitigate a noise nuisance.

48. The Licensee shall not cause or permit an odour nuisance to be created as a result of the construction, operation, or alteration of the facility, and shall take such steps as the Director may require to eliminate or mitigate an odour nuisance.
49. The Licensee shall not emit any pollutant from any pollutant source listed in Schedule 6 of this Licence other than through the corresponding control equipment listed in Schedule 6 of this Licence, unless otherwise approved in advance.
50. The Licensee shall, upon the request of the Director, conduct a review of Best Available Control Technology Economically Achievable for the control of VOC, particulate matter, and other air pollutant control at the Development. This review shall include, but not be limited to, the pollutants for which air emission limits are described in clauses 51 to 54 of this Licence.

Baghouses

51. The Licensee shall not emit pollutants from the Development such that any pollutant from the following sources exceeds the limit value listed, as determined pursuant to the stack sampling required by Clause 13 of this Licence:

Pollutant Source	Pollutant	Limit (grams per second)
a) BH1 Trim Saws:.....	TPM.....	0.15
b) BH2 Formers:.....	TPM.....	0.09
	Phenol.....	0.30
c) BH3 Raw fuel storage bin:.....	TPM.....	0.09
d) BH4 Sander dust:.....	TPM.....	0.11
e) BH5 Flying cut-off saw:.....	TPM.....	0.13
f) BH6 Sander Dust:.....	TPM.....	0.11
g) BH7 Shake line Saws.....	TPM.....	0.15

Thermal Oil Heater System

52. The Licensee shall not emit pollutants from the Development such that any pollutant from the following source exceeds the limit value listed, as determined pursuant to the stack sampling as required by Clause 13 of this Licence:

Pollutant Source	Pollutant	Limit (grams per second)
Thermal oil heater ESP	Benzene.....	0.0066
	Nitrogen Oxides.....	5.3
	Phenol.....	0.4
	TPM.....	2.18
	Total VOCs.....	1.41

Wood Strand Dryers

53. The Licensee shall not emit pollutants from the Development such that any pollutant from the following source exceeds the limit value listed, as determined pursuant to stack sampling as required by Clause 13 of this Licence:

Pollutant Source	Pollutant	Limit (grams per second)
Combined Dryer E-tubes	Acrolein.....	0.28
	Benzene.....	0.172
	Formaldehyde.....	4.0
	Nitrogen oxides.....	5.3
	Phenol.....	0.5
	TPM.....	5.14
	Total VOCs.....	20.96

Press

54. The Licensee shall not emit pollutants from the Development such that any pollutant from the following source exceeds the limit value listed, as determined pursuant to the stack sampling as required by Clause 13 of this Licence:

Pollutant Source	Pollutant	Limit (grams per second)
Press	Benzene.....	0.0197
	Formaldehyde.....	1.1
	MDI.....	0.089
	Phenol.....	0.7
	TPM.....	2.1
	Total VOCs.....	2.78

55. The Licensee shall immediately cease operation of any wood strand dryer in the event of a shutdown or a failure of an E-tube emission control system connected to that wood strand dryer.

56. The Licensee shall record each occurrence of shutdown or a failure of a Dryer E-tube, or each occurrence of emissions from the Thermal Oil Heater System emergency stack or Dryer Energy System emergency stack, compiling the following information:

- a) date and time of the occurrence;
- b) time required to shut down the affected component;
- c) component affected;
- d) reason for the occurrence;
- e) action taken to correct the cause of the occurrence and the action taken to prevent the occurrence from repeating;
- f) date and time of re-start or cessation of emission; and submit that information to the Director or Environment Officer, within 24 hours of the re-start or cessation of emission or before noon of the first business day following an occurrence on a weekend or statutory holiday. Such notification shall be by facsimile, e-mail or any other notification procedure approved in advance.

57. The Licensee shall submit an annual report to the Director summarizing the information compiled in Clauses 24, 56, and 61 of this Licence over the previous calendar year, not later than March 1 of each year.
58. The Licensee shall not burn fuel oil that has a sulphur content in excess of 0.05% by weight in stationary equipment at the Development.
59. The Director may impose such additional specifications, limits, terms, or conditions deemed necessary for effective environmental management in response to the results of monitoring obligations imposed on the Licensee by this Licence.
60. The Licensee shall provide advance notification to the Director of periods lasting in excess of one week during which the Development will not be operating. Such notification shall be by facsimile, e-mail or any other notification procedure approved in advance.

Respecting Emergencies

61. The Licensee shall, in the case of physical or mechanical equipment breakdown or process upset where such breakdown or process upset results or may result in the release of a pollutant in an amount or concentration, or at a level or rate of release, that causes or may cause a significant adverse effect, immediately report the event by calling the 24-hour environmental accident reporting line at 204-944-4888 (toll-free 1-855-944-4888). The report shall indicate the nature of the event, the time and estimated duration of the event and the reason for the event.
62. The Licensee shall, following the reporting of an event pursuant to Clause 61:
 - a) identify the repairs required to the mechanical equipment;
 - b) undertake all repairs to minimize unauthorized discharges of a pollutant;
 - c) complete the repairs in accordance with any written instructions of the Director or the Environment Officer; and
 - d) submit a report to the Director about the causes of breakdown and measures taken, within one week of the repairs being done.
63. The Licensee shall prepare, within 90 days of the date of issuance of this Licence, and maintain an emergency response contingency plan in accordance with the Canadian Centre for Occupational Health and Safety "Emergency Response Planning Guide" or other emergency planning guidelines acceptable to the Director.

Respecting Financial Assurance

64. The Licensee shall maintain the current financial assurance plan, in a form of Letter of Credit for the amount of \$250,000. This financial security and renewals thereof shall remain in place for the duration of the operation and decommissioning of the Development until replaced as required by Clause 66 of this licence.

65. The Licensee shall prepare, within 5 years of the date of this licence, a remediation and closure plan assessment, satisfactory to the Director, that includes, but is not limited to, the following:
 - a) Estimated cost to assess the impacts of the development to soil and groundwater;
 - b) Estimated cost to remediate impacts of the development identified in the assessment referred to in clause 65 a);
 - c) Estimated cost to decommission the development.

66. The Licensee shall maintain and post with Manitoba Environment, Climate and Parks, in the amount determined in Clause 65 of this Licence
 - a) A permit bond issued by a surety company licenced to do business in the Province of Manitoba;
 - b) An irrevocable letter of credit; or
 - c) Another acceptable security satisfactory to the Director.

This permit bond, irrevocable letter of credit, or other security and renewals thereof shall remain in place for the duration of the operation and decommissioning of the facility. The Director may order forfeiture of the permit bond, irrevocable letter of credit, or other security, either in whole or in part, by giving written notice to that effect to the Licensee, upon the Director being satisfied that the Licensee is in breach of any specification, limit, term or condition of this Licence, or for reimbursement of any costs or expenses incurred by the Province of Manitoba in rectifying environmental damage caused or contributed to by the operation of the facility.

67. The Licensee shall, every 5 years or more frequently at the Licensee's preference or the request of the Director, carry out a review of the assessment completed pursuant to Clause 65 of this licence and accordingly update the amount of the permit bond, irrevocable letter or credit or other security required by Clause 66 of this licence.

68. The Licensee shall maintain a valid Environmental Impairment Liability insurance providing coverage subject to a minimum limit of \$5,000,000 Cdn per occurrence or claim, including coverage for gradual, and sudden and accidental pollution. Coverage to include on-site and off-site clean up costs, and be placed with insurers satisfactory to the Province of Manitoba. The Province of Manitoba is to be added as an Additional Insured on the policy. The policy shall contain a clause stating that the Insurer will give Manitoba 60 days prior written notice in case of a reduction in coverage or policy cancellation.

REVIEW AND REVOCATION

- A. This Licence replaces Licence No. 2954 RR which is hereby rescinded.

- B. If in the opinion of the Director, the Licensee has exceeded or is exceeding or has failed or is failing to meet the specifications, limits, terms or conditions set out in this Licence, the Director may, temporarily or permanently, revoke this Licence.

- C. If, in the opinion of the Director, new evidence warrants a change in the specifications, limits, terms or conditions set out in this Licence, the Director may require the filing of a new proposal pursuant to the Environment Act.

Original Signed by

Laura Pyles
The Environment Act

**Schedule 1 to Environment Act Licence No. 2954 RRR
Ambient Air Quality Monitoring Plan**

Table 1.1 Variables and Methods for Analysis and Monitoring Frequency

Pollutant	Averaging Period	Sampling Frequency
Acrolein	24-hour	6-day cycle

**Schedule 2 to Environment Act Licence No. 2954 RRR
Ambient Surface Water Quality Monitoring Plan**

Table 2.1 Monitoring Site Locations and Frequency.

Sampling Point	Location¹	Sampling Method	Frequency
AP1	South end of property	Grab	Weekly ² , when flow is present
AP2	South end of property	Grab	Weekly, when flow is present
AP4	Northwest of mill	Grab	Weekly, when flow is present
Surface Drain	North end of property	Grab	Weekly, when flow is present

¹ As indicated on attached Figure 1

² weekly means at an interval between sample collection events of not less than 5 days and not greater than 7 days

Table 2.2 Water Quality Variables for Analysis

Ammonia	Total Dissolved Solids	Total Suspended Solids
Biochemical Oxygen Demand	Total Kjeldahl Nitrogen	Turbidity
Colour (true)	Total Organic Carbon	
Conductivity	Total Phenols	
Dissolved Organic Carbon	Total Phosphorus	
Dissolved Oxygen	Total Suspended Solids	
Fecal Coliform (MPN)	Total Solids	

**Schedule 3 to Environment Act Licence No. 2954 RRR
Ground Water Monitoring Plan**

Table 3.1 Monitoring Site Locations and Frequency.

Well¹	Location	Frequency
LP1	North of railway spur in the South-east corner of property (as shown on Figure 1)	Semi-annually ²
LP2	North-west corner of ash storage (as shown on Figure 1)	Semi-annually ²
LP3	Center of log yard (as shown on Figure 1)	Semi-annually ²
LP4	Centre of the North boundary of log yard (as shown on Figure 1)	Semi-annually ²
LP5	North-east corner of log yard (as shown on Figure 1)	Semi-annually ²
LP6	Centre of the East boundary of log yard (as shown on Figure 1)	Semi-annually ²
LP7	North-east corner of property (as shown on Figure 1)	Semi-annually ²
K1	Existing domestic well located in the South-west corner of the South-west quarter of section 16-36-25W	Semi-annually ²

¹ As indicated on attached Figure 1

² Semi-annually means at an interval of not less than 150 days and not greater than 210 days.

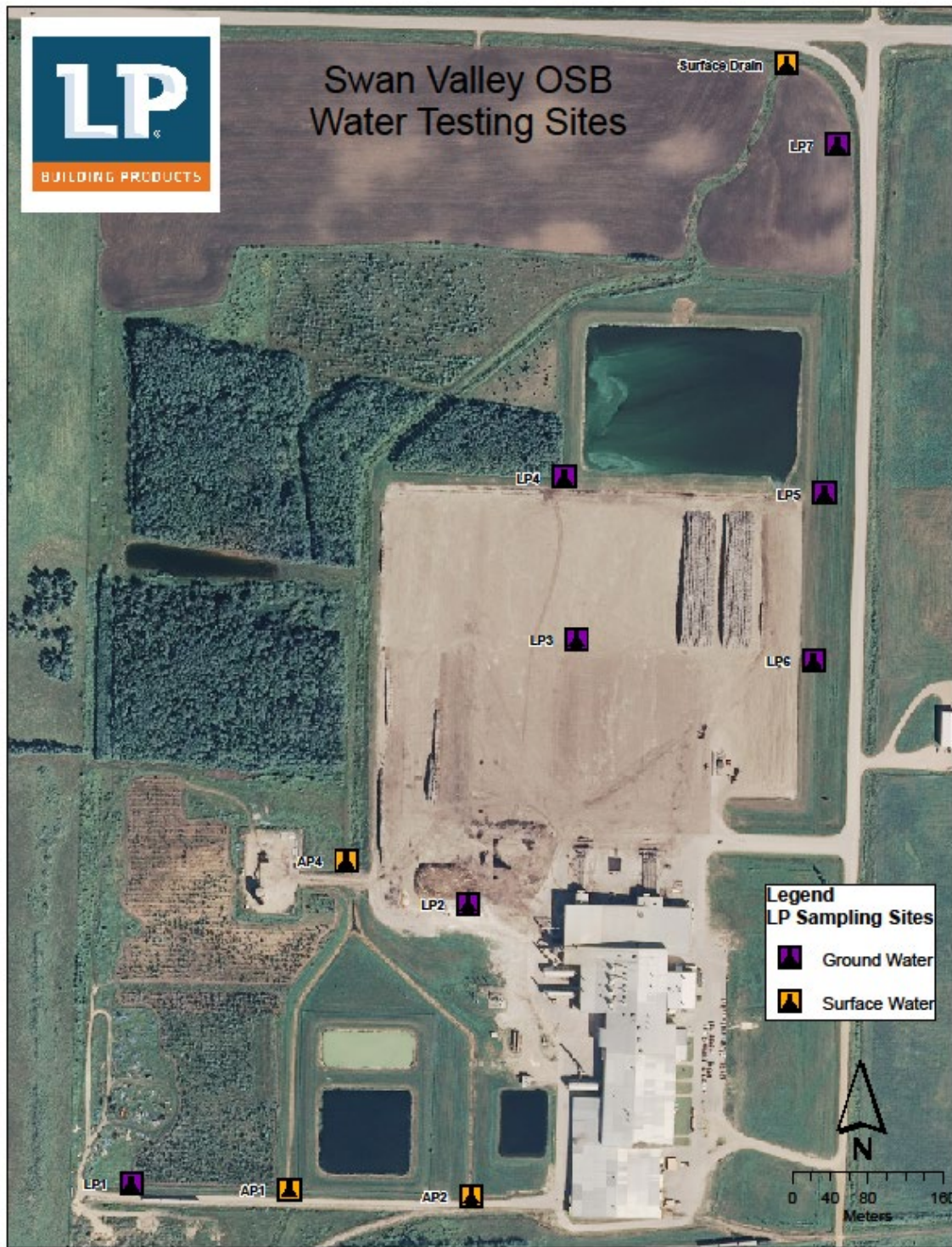
Table 3.2 Water Quality Variables for Analysis

Fecal Coliform (MPN)	Total Organic Carbon	Total Phenols
Colour (true)	Total Cyanide	pH
Dissolved Organic Carbon	Total Dissolved Solids	Conductivity
Nitrate-nitrite nitrogen		

Additional Information: Elevation of water table for each well except K1.

Commencement Date: Upon issuance of this Licence or at such later date as may be approved in advance by the Director.

Figure 1. Surface and Groundwater Monitoring Locations for Environment Act Licence No. 2954 RRR



**Schedule 5 to Environment Act Licence No. 2954 RRR
Operating Parameters**

General Plant

- a) Daily production recorded as tons of finished product from the Press;
- b) Daily weight and rate of application of each resin added;
- c) Daily weight and rate of application of zinc borate;
- d) Major plant components (listed as Pollutant Source and Control Equipment in Schedule 6) operating; and
- f) The sulfur content (% by weight) for each shipment of fuel oil received as determined by means of the most current ASTM method or by supplier guaranteed sulfur content.

Baghouses

- a) Pressure drop across each baghouse as recorded each day;
- b) Daily observations for visual emissions; and
- c) One set of opacity readings (the average of any 24 consecutive opacity observations taken at 15 second intervals) as recorded by a trained observer, during all occasions of visual emissions, for each baghouse stack.

Thermal Oil Heater System

- a) Daily fuel source and usage;
- b) Daily ESP electrostatic field voltage as recorded hourly;
- c) Daily ESP electrostatic field current as recorded hourly; and
- d) Any corrective actions taken.

Wood Strand Dryer System

The following information shall be provided for each component individually:

Dryers

- a) Daily fuel source and usage; and
- b) Dryer inlet and outlet temperatures as recorded hourly.

E-Tube ESP

- a) Daily ESP electrostatic field voltage as recorded every two hours;
- b) Daily ESP electrostatic field current as recorded every two hours; and
- c) Any corrective actions taken.

**Schedule 6 to Environment Act Licence No 2954 RRR
Air Pollution Control Equipment and Emission Stack Heights**

Table 6.1

Pollutant Source	Control Equipment	Height
Thermal oil heater:.....	ESP ¹	30.5 metres
Thermal oil heater by-pass:.....	none.....	22.9 metres
Standby Thermal oil heater:.....	none.....	24.4 metres
Press:.....	none:.....	30.5 metres
Dryers:.....	E-tube ²	49.5 metres
Trim Saws:.....	Baghouse.....	22.4 metres
Formers:.....	Baghouse.....	25.4 metres
Raw fuel storage bin:.....	Baghouse.....	23.9 metres
Sander dust:.....	Baghouse.....	22.4 metres
Flying cut-off saw:.....	Baghouse.....	25.5 metres
Sander Dust:.....	Baghouse.....	22.4 metres
Shake Line Saws:.....	Baghouse.....	22.3 metres

¹ Electrostatic Precipitator

² Wet Electrostatic Precipitator Trade Mark by Geoenergy International Corporation