



Manitoba Conservation and Water Stewardship
Environmental Approvals Branch
123 Main Street, Suite 160
WINNIPEG MB
R3C 1A5
CANADA

February 19 2015

Attention: Krystal Penner

RE: Notice of Minor Alteration, Viterra Ste. Agathe Facility license No. 2850 R

Dear Ms. Penner,

This letter is to request infrastructure upgrades at the Viterra Ste. Agathe facility currently operating under Manitoba Conservation and Water Stewardship (MC) license 2850 R.

This application includes:

- A hard copy of the Notice of Minor Alteration,
- Drawing of the solid process flow
- Diagram of the proposed cyclone filtration system
- Copy of operational license 2850R.

The target construction date for this project is April 2015. If you would please contact me to indicate if you will not be able review and approve this application in time for this deadline.

If you have any questions please do not hesitate to contact me at 403.263.9195.

Regards,

A handwritten signature in blue ink, appearing to read "Michael Edmonds".

Michael Edmonds
Manager, Environmental Affairs North America Operations
Viterra Incorporated.



Minor Alteration Notification – Licence No. 2850R
Viterra Inc. – Ste. Agathe

1. Site Information

This alteration notification is to request a construction approval for Viterra Inc., for its Ste. Agathe Canola Processing facility (the Site), under the current MB Conservation License No. 2850R located at River Lots 555, 557, 559 except all that portion which lies to the East of the Western limit of Right of Way on Railway Plan 5560 WLTO and Water Control Work plan 8418 WLTO.

2. Changes within the development

In accordance with current MB Conservation Licence No. 2850R, the facility is licensed to operate a food processing plant for manufacturing vegetable oils and refining them into edible oils.

At this time Viterra Inc. would like to notify MB Conservation that it intends to replace the horizontal seed conditioner with a new vertical seed conditioner (VSC). The duty of both units is to use steam as a heating agent to reduce the moisture in canola seed from 8% to 4% prior to the seed being processed.

The current seed conditioner was installed in the main crush building in the mid 1990's with a process capacity of 1000 metric tones per day (mtpd). The new VSC, manufactured by Crown Iron Works of the USA, will have the same process capacity of 1,000 mtpd but will be housed in a new 7m x 7m building placed within 1.5m of the main crush building.

3. Maps, drawings, site plans, etc.

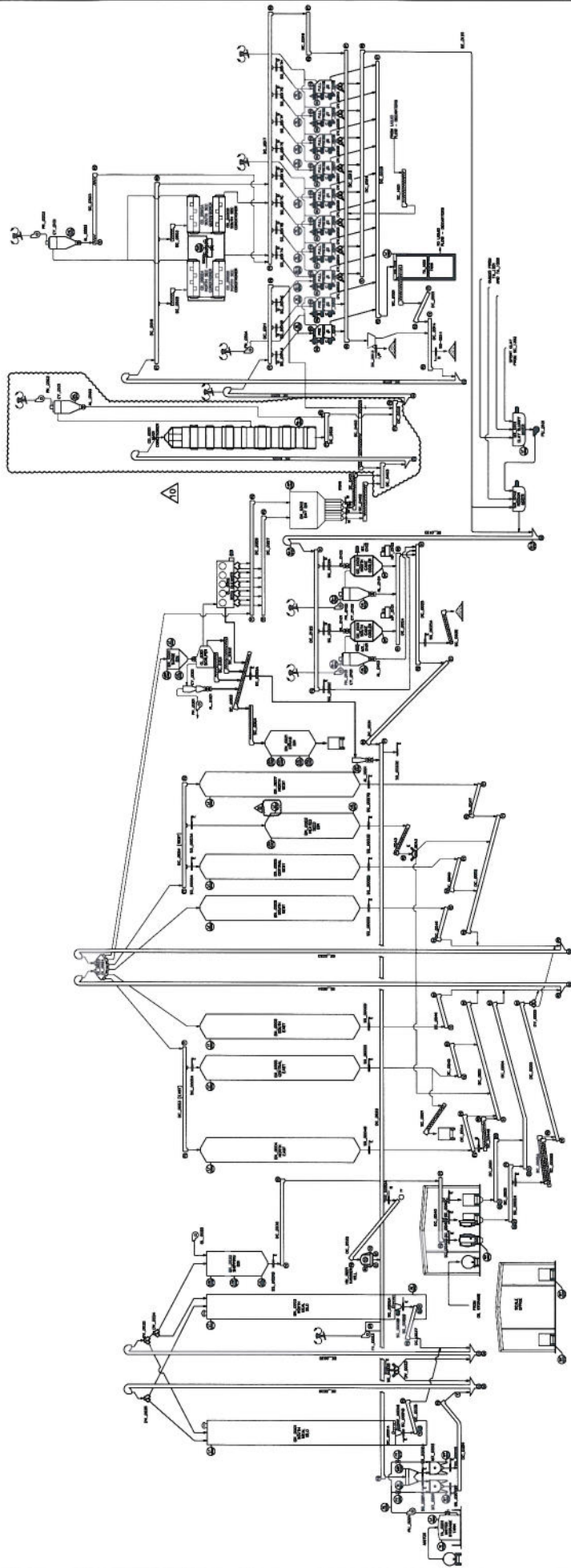
A revised drawing of the Solid Process Flow (Drawing Reference NO: STG-F-01) has been attached for MB Conservations' files. A drawing (DM119169) has been attached showing the proposed cyclone.

4. Identification and Quantification of Changes to the Type or Quantity of Raw Materials or Substances Used or Processed.

Viterra does not intend to change the type of materials or substances currently used or processed.

5. Quantification of Change in the Environmental Effects as a Result of the Alteration

The intent of the VSC installation is to improve process performance thereby reducing total energy use. Additional to this the associated cyclones will be high efficiency units which are also projected to be more efficient at removing dust and particulate from the air prior to discharge to atmosphere while reducing total energy use.



NOTES:
 1. CYCLONE CY 0003, CONTROL VALVES FV1015 & FV1016, ADDED SILVERSON MIXER, REMOVED FAN 0502 & RELICATED FAN 0503
 2. REMOVED CONDENSERS, BRAG 0509 & CYCLONE 0101, INSTALLED NEW BRAG 0508, BRAG 0403, SCREW SC 0403, LEG BE 0404

NO.	DESCRIPTION	DATE	BY	NO.	REVISIONS	DATE	BY	NO.	REVISIONS	DATE	BY	NO.	REVISIONS
7	GENERAL REVISIONS	25.00713	J.P.	0	WORK IN PROGRESS	14.06.01	BM	14.06.01	BM	14.06.01	BM	14.06.01	BM
8	GENERAL REVISIONS	26.00114	J.P.	1	PRELIM REV - RELEASED TO CELCO	21.06.11	TK	21.06.11	TK	21.06.11	TK	21.06.11	TK
9	SEE NOTE 1	30.00115	J.P.	2	AS - BUILT'S	21.06.11	TK	21.06.11	TK	21.06.11	TK	21.06.11	TK
10	SEE NOTE 2	08.00116	J.P.	3	GENERAL REVISIONS	21.06.11	TK	21.06.11	TK	21.06.11	TK	21.06.11	TK
				4	SECOND CONDITIONER STEAM TCV	23.00116	BM	23.00116	BM	23.00116	BM	23.00116	BM
				5	SC-0501 BELOW CYCLONE	23.00116	BM	23.00116	BM	23.00116	BM	23.00116	BM
				6	AS - BUILT	24.00116	BM	24.00116	BM	24.00116	BM	24.00116	BM
					SC-0407 REMOVED	24.00116	BM	24.00116	BM	24.00116	BM	24.00116	BM



SOLID PROCESS FLOW
 CANOLA PROCESSING PLANT
 STE. AGATHE, MANITOBA

SHEET NO. 1 OF 1
 PROJECT NO. STG-F-01
 REVISIONS 10

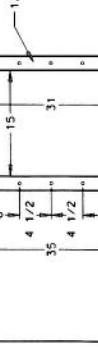
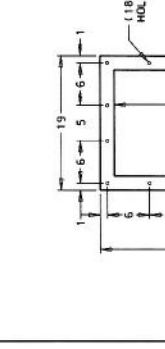
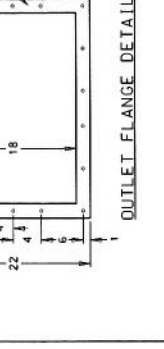
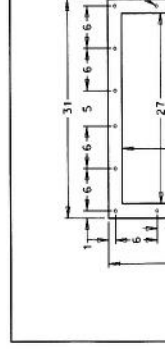
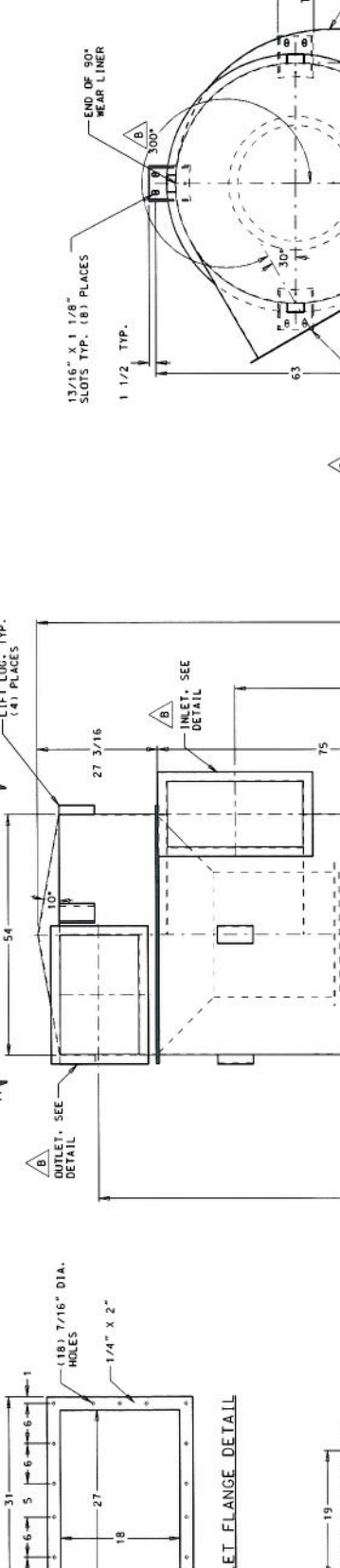
REV.	DESCRIPTION	DATE	BY
B	REVISED & RELEASED FOR CUST INFO	02/05/15	SLK

REVISIONS

DATE 02/05/2015

DM19169

www.schemdp.com



- NOTES:
- ALL DIMENSIONS ARE IN INCHES.
 - MATERIALS OF CONSTRUCTION:
 - A. ALL TO 304 STAINLESS STEEL
 - B. HOUSING FLANGES 304 STAINLESS STEEL
 - C. VORTEX RISER TUBE: 10 GA. 304 STAINLESS STEEL
 - AIR VOLUME (CFM) CAPACITIES:
 - 7-217 @ 2" W.G.
 - 10-220 @ 4" W.G.
 - APPROXIMATE WEIGHT: 1,920 LBS.
 - CLOCKWISE INLET ROTATION
 - SCMT: 11002594-010-1
 - TAG: CYC-102 (RED)
 - CROWN PROJ. NO.: VITERRA

FINISH SPECIFICATIONS:
 INTERIOR STANDARD SKIP WELDS GROUND SMOOTH, TO AVOID AIR FLOW INTERFERENCE. EXTERIOR WELDS TO BE CONTINUOUS, NOT GROUND, BUT CLEANED, FREE OF WELD SLAG AND SPATTER.

THIS PRINT IS CERTIFIED TO BE DIMENSIONALLY CORRECT TO ± 1/4 INCH ON ALL COMPONENTS, ± 1/2 ON OVERALL DIMENSIONS UP TO 120 INCHES AND ± 1 1/2 ON ALL DIMENSIONS OVER 120 INCHES.

DATE 02/05/2015

BY: Steve Kehler

DATE 02/05/2015

DATE 02/05/2015

schendprocess
 CENTRAL COLLECTION
 TO M20 AIRLOCK FOR
 CROWN IRON WORKS

Net Process - Schend Process
 SLS 01/20/15
 5/64" ±

DATE 02/05/2015

DM19169

THE ENVIRONMENT ACT
LOI SUR L'ENVIRONNEMENT

Manitoba 

LICENCE

Licence No. / Licence n° 2850 R

Issue Date / Date de délivrance October 8, 2008

Revised : June 30, 2009

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 10(1) / Conformément au Paragraphe 10(1)

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

VITERRA INC.; "the Licencee"

for the continued operation of an existing Development being a food processing plant for manufacturing vegetable oils and refining them into edible oils, located at River Lots 555, 557, 559 except all that portion which lies to the East of the Western limit of Right of Way on Railway Plan 5560 WLTO and Water Control Work Plan 8418 WLTO in the Rural Municipality of Ritchot; in accordance with the updated description of the facility submitted on July 16, 2008, and subject to the following specifications, limits, terms and conditions:

DEFINITIONS

In this Licence,

"accredited laboratory" means an analytical facility accredited by the Standard Council of Canada (SCC), or accredited by another accrediting agency recognized by Manitoba Conservation 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;

"ASTM" means the American Society for Testing and Materials;

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

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

"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 the members of the public;
- if the unwanted sound:

**** A COPY OF THIS LICENCE MUST BE KEPT ON SITE AT THE DEVELOPMENT AT ALL TIMES ****

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- (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 the 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 unwanted 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;

“Standard Methods for the Examination of Water and Wastewater” means the most recent edition of Standard Methods for the Examination of Water and Wastewater published jointly by the American Public Health Association, the American Waterworks Association and the Water Environment Federation; and

“wastewater” means any liquid process stream or surface run-off containing a pollutant as defined in The Environment Act, associated with or resulting from the Development, which is discharged into the environment.

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GENERAL TERMS AND CONDITIONS

This Section of the Licence contains requirements intended to provide guidance to the Licencee 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 Licencee shall implement a high standard of equipment maintenance and good housekeeping and operational practices with respect to the Development, at all times.
2. The Licencee shall reduce the production and dissemination of wastes by initiating and maintaining waste reduction and waste recycling programs.
3. The Licencee shall, upon the request of the Director and in addition to any of the limits, terms or conditions specified in this Licence:
 - 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 pollutants from the said Development; or
 - c) 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.
4. The Licencee 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 and air samples in accordance with methodologies approved by the Director;
 - c) ensure that all analytical determinations are undertaken by an accredited laboratory; and
 - d) report the results to the Director within 60 days of the samples being taken.
5. The Licencee shall carry out any remedial measures, modifications, or alterations, as deemed necessary by the Director, in respect to matters authorized under this Licence.
6. The Licencee shall provide to the Director, upon request, all information required under this Licence, in writing and in such form and content (including number of copies), as may be specified by the Director.
7. The Licencee shall designate an employee, within 60 days of the date of issuance of this Licence, as the Licencee's Environmental Coordinator, whose job description will include assisting the Licencee in complying with the limits, terms and conditions in this Licence and assisting Senior Management

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of the Licencee 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.

SPECIFICATIONS, LIMITS, TERMS AND CONDITIONS

Respecting Air Emissions – Limits

8. The Licencee shall not emit particulate matter from the Development such that:
 - a) particulate matter:
 - i) exceeds 0.23 grams per dry standard cubic metre calculated at 25 degrees Celsius and 760 millimetres of mercury, corrected to 12 percent carbon dioxide from any point source of the Development;
 - ii) exhibits a visible plume with an opacity of greater than 5 percent at any point beyond the property line of the Development; or
 - iii) results in the deposition of visible particulate residue at any time beyond the property line of the Development; or
 - b) opacity from any point source of the Development equals or exceeds:
 - i) 20 percent as the average of any 24 consecutive opacity observations taken at 15 second intervals;
 - ii) 20 percent for more than 16 individual opacity observations within any 1 hour period;
or
 - iii) 40 percent for any individual opacity observation.
9. The Licencee shall not cause or permit a noise nuisance to be created as a result of the operation or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate a noise nuisance.
10. The Licencee shall not cause or permit an odour nuisance to be created as a result of the operation or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate an odour nuisance.

Respecting Air Pollution Control Equipment

11. The Licencee shall direct all air streams, which contain a pollutant(s) of concern to the Director, to a pollution control device which has been designed for and demonstrated to be capable of reducing, altering, eliminating or otherwise treating the pollutant(s).
12. The Licencee shall submit for the Director's approval, within 90 days of the issuance of this Licence, a standard operating procedural manual and a maintenance schedule for each air emission pollution control device based on the manufacturer's specifications and recommendations.
13. The Licencee, upon receiving the Director's approval as required in Clause 12 of this Licence, shall not operate any process directing an emission to an air pollution control device at the Development unless:
 - a) the operating and maintenance measures and status of the device are in full compliance with the approved procedures and timetables;

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- b) all emissions from the process are directed to the fully operational air pollution control device;
 - c) all discharges of treated emissions from the air pollution control devices are immediately directed to a stack; and
 - d) the emissions do not contain concentrations of pollutants which:
 - i) are in violation of any other applicable legal instrument including an Act, Regulation or by-law; or
 - ii) otherwise create a significant negative environmental or health impact in the affected area.
14. The Licencee shall, in case of physical or mechanical equipment breakdown or process upset where such breakdown or upset may result in the emission, release, or discharge of a pollutant, notify the Director:
- a) as soon as possible but no later than within 24 hours of the occurrence; or
 - b) before noon of the first business day following an occurrence on a weekend or statutory holiday.

Such notification shall be by facsimile or any other notification procedure approved by the Director, stating the nature of the occurrence, the time and estimated duration of the event and the reason for the occurrence.

15. The Licencee shall maintain a log book of the most recent 24 month period to record any downtime of an air pollution control device due to either the breakdown or maintenance of that air pollution control device. The log book shall be kept at the Development and shall be available upon request for inspection by an Environment Officer. The log book shall record, at minimum, the following information:
- a) identification of the air pollution control device and the process(s) it serves;
 - b) time/date of log entry;
 - c) nature of event;
 - d) duration of event;
 - e) the accumulated downtime of this air pollution control device for the events for each calendar year; and
 - f) signature of the Environmental Coordinator.
16. The Licencee shall handle, store and dispose of all pollutants collected by the air pollution control equipment in a manner suitable to their characterization as type of waste or dangerous good.

Respecting Monitoring

17. The Licencee, upon written request from the Director, shall provide a stack or stacks 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 Conservation Guideline, *Guideline for Stack Sampling Facilities*, unless otherwise approved by the Director.

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18. The Licencee, upon a written request from the Director, 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, including any compounds determined by the Director. 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.
19. The Licencee shall perform all stack sampling in accordance with the most recent version of Manitoba Conservation Report No. 96-07, *Interim Stack Sampling Performance Protocol*, unless otherwise approved by the Director.
20. The Licencee shall arrange the scheduling of the sampling program submitted pursuant to Clause 18 of this Licence such that a representative of Manitoba Conservation is available to monitor and audit the implementation of the sampling program.
21. The Licencee shall complete the sampling of emissions according to the approved plan submitted pursuant to Clause 18 of this Licence, within a timeframe to be determined by the Director.
22. The Licencee shall submit a report, for the approval of the Director, of the completed sampling and analysis plan approved pursuant to Clause 18 of this Licence, within 60 days of the receipt of the analytical results of that sampling plan. The report shall contain 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.
23. The Licencee, upon the written request of and in a timeframe stipulated by the Director, shall comply with any air emission or ambient air quality criteria specified by the Director for any pollutant of concern to the Director which has been identified pursuant to Clause 3, 8, 11 or 22 of this Licence.

Respecting Air Dispersion Modelling of Emissions

24. The Licencee shall submit, upon the request and for the approval of the Director, a proposal for the air dispersion modelling of all emissions from the Development such that any health, environmental and/or nuisance impact is assessed.

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25. The Licencee shall submit, within a time frame stipulated by the Director, a report discussing the results of the air dispersion modelling performed in accordance with the proposal approved pursuant to Clause 24 of this Licence.

Respecting Chemical Storage and Spill Containment

26. The Licencee shall provide containment for all vessels containing chemicals and in each area of the development where the chemicals are stored, loaded, transferred, used or otherwise handled, in compliance with the National Fire Code of Canada (2005), or any future amendment thereof, such that any product leakage or spillage and any contaminated liquid generated is contained within the Development and contamination of groundwater and surface water is prevented.
27. The Licencee shall, in a manner approved by the Director, remove and dispose of all spilled dangerous goods.

Respecting Wastewater Discharge

28. The Licencee shall discharge wastewater only to the Rural Municipality of Ritchot Ste. Agathe Wastewater Treatment lagoon.
29. The Licencee shall discharge wastewater in accordance with the industrial use agreement between the Licencee and the Rural Municipality of Ritchot.
30. The Licencee shall operate the Development only at such times as a valid industrial use agreement between the Licencee and the Rural Municipality of Ritchot is in effect.
31. The Licencee shall not discharge any wastewater from the Development that has a vegetable oil and grease concentration in excess of 85 milligrams per litre for any grab sample, as determined according to Method 5520C of the most current edition of "Standard Methods for the Examination of Water and Wastewater".

Respecting Solid Waste

32. The Licencee shall within 60 days of the issue date of this Licence, provide a detailed description and inventory of solid waste generated at the facility, including current and proposed disposal methods.


Emergency Response Plan

33. The Licencee shall:
- a) within 120 days of the issuance of this Licence, or other time frame approved by the Director, submit for approval of the Director a contingency plan in accordance with the Manitoba Industrial Accidents Council (MIAC) *Industrial Emergency Response Planning Guide*, outlining procedures to be used in the event of a leak, spill, fire, or other hazardous condition at the Development; and
 - b) continually maintain the approved Emergency Response Plan in a current status for the duration of the Development.

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REVIEW AND REVOCATION

- A. This Licence replaces Licence No. 2850 which is hereby rescinded.
- B. If in the opinion of the Director, the Licencee has exceeded or is exceeding or has 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.



Tracey Braun, M.Sc.
Director
Environment Act

Client File No.: 4039.10