



March 31, 2021

***Shannon Kohler***

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

Dear Ms. Kohler

**Re: Request for Postponement of 2021 Mill Stack Testing**

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

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

We are requesting the postponement of the stack testing requirement for 2021 to 2022 and then proceed every two years thereafter 2022. The stack testing company (Interpol Labs Inc.) that we have been using the last 20+ years out of Minneapolis, MN is reluctant to commit to performing stack testing while the US/Canada border is closed due to Covid-19. Not only are they concerned about being able to get across the border and having to possibly isolate for fourteen days prior to coming on site to stack test, but they are concerned that they may possibly have to isolate for another time period on entry back to the US. There are no alternative stack testing companies that can perform the required testing scope for the mill. We reached out to two companies, Barr Engineering (based out of Wisconsin) and McCall Testing (BC), but neither can perform the entire test protocol.

Unfortunately, there does not seem to be any clear timeline for when the US/Canada border will re-open and Interpol's schedule is filling up fast. Because we can't guarantee them a date where the border will open, their availability is unlikely as they are close to booking up for the fall. Due to the amount of advance planning required with this project, it is becoming prohibitive to schedule with the uncertainties of future Covid-19 requirements and restrictions. LP wants to ensure the safety of the community and limit the potential for virus transmission, and postponing stack testing may be the most practical option for achieving this goal.

P.O. Box. 189  
Minitonas, MB

204.525.2479  
204.525.4327  
[www.lpcorp.com](http://www.lpcorp.com)

We are confident that postponing 2021 stack testing will not have any negative impact on our operating systems or the environment. Daily checks are performed on all pollution control equipment and systems are monitored to ensure optimal performance. Baghouse systems are inspected daily and operating parameters are recorded. Stacks are checked to ensure no visible emissions are being discharged and procedures are in place to shut down operations and rectify if detected. Quarterly maintenance inspections are performed to ensure cleanliness and the effective internal operation of baghouses. WESPs are also monitored daily and subject to routine internal maintenance to ensure efficient operation. All WESPs are programmed to shut down their corresponding drying systems if they are not operating at target levels. The dry ESP on the thermal oil furnace is also continuously monitored and inspected for visible emissions. Operational issues alarm in our press control room that has an operator monitoring 24/7. Procedures are in place to rectify any of our compliance operating conditions, opacity levels of stack discharges are tracked during upset conditions, and these events are tracked and reported to Manitoba Conservation.

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



Kevin Betcher  
Plant Manager, Swan Valley Siding

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

File