

March 23, 2017

Tracey Braun
Director, Environmental Assessment and Licensing
Manitoba Sustainable Development
160 - 123 Main Street
Winnipeg MB R3C 1A5
Canada

Dear Ms. Braun:

RE: Notice of Request for Alteration – Environment Act License 1102R HyLife Foods LP

This Notice of Request for Alteration is submitted to Manitoba Sustainable Development on behalf of the licensees for Environment Act License 1102R. This request for a minor alteration is for the temporary transfer of effluent from the HyLife Foods Truck Wash to the town of Neepawa municipal wastewater system.

1. Purpose

Currently, HyLife Foods treats and discharges all effluent produced at the HyLife Foods pork processing facility and truck wash at R3 Innovations Inc, an industrial wastewater facility owned and operated jointly by Hylife Foods and the town of Neepawa. At current, the R3 Innovations Inc facility is experiencing some short term processing challenges due to current challenges, it has been projected that R3 Innovations could be nearing processing capacity in the coming weeks. In anticipation of these potential challenges, HyLife Foods is requesting a temporary diversion of truck wash effluent from the industrial wastewater facility to the town of Neepawa municipal wastewater system for a period of 5-6 weeks.

2. Background

Currently, HyLife Foods truck wash discharges on average 140 to 160 m³/day, 5 days per week of wash water to the R3 Innovations Inc facility. Current process capacity at R3 Innovations is anticipated to be limited due to a couple of factors:

- Weekend kill operations
- Easter long weekend
- Impending membrane bioreactor cleaning (both trains will require a clean within the next 1.5 months, limiting throughput capacity during the clean period)

In anticipation of these potential upcoming challenges, HyLife Foods is requesting a diversion of the truck wash water to the municipal lagoon for a 5-6 week period. Based on existing flows, this will free up approximately 4200 to 4800 m3 of process capacity within R3 Innovations. This should allow the wastewater treatment facility an opportunity to complete the cleaning operations and return to normal operations post the 5-6 week period.

3. General Project Description

HyLife Foods is proposing to place a manure tanker on site at the HyLife Foods Truck Wash and transfer all wash water into the tank. Once filled, the tanker will transport the screened wash water to the municipal cell 1 lagoon for further treatment. Approximately 4-6, 8000 gallon tanker loads will be required daily to accommodate this transfer. The town of Neepawa has a dump station on their primary cell that can accommodate transfers of this nature. HyLife would like to initiate the transfer on March 27th, 2017 and complete on May 8th, 2017.

The town of Neepawa, through their Operations & Maintenance Director, Denis Saquet, has indicated that their lagoon system is functioning properly at this time and that they are capable of, and willing to accept this additional flow for the previously described timeframe. Denis Saquets can be contacted at (204)-476-7655 if additional clarity is required.

At current, R3 Innovations has undergone a full engineering assessment to determine the overall processing capacity of the existing infrastructure. The engineering assessment has identified some immediate infrastructure improvements that would have a positive impact on the throughput capacity of the facility. This includes operational adjustments and increasing our existing membrane capacity through adding additional membranes. These changes are being considered for immediate execution and a further NoA will be delivered should these changes alter the facility design.

4. Environmental Effects

Traffic – a minor increase in traffic of 4-6 tanker loads will be experienced during the transfer period on municipal gravel roads. The increase would be considered minor in effect and short term in duration.

Air Emissions – Minor increase in air emissions will be experienced through additional fossil fuel combustion from the transport vehicle. The overall impact on emissions would be considered negligible.

Wastewater – transferring the truck wash effluent to the municipal lagoon will have a positive effect on the throughput capacity at R3 Innovations, potentially alleviating a future upset condition. In communication with the town of Neepawa engineering department, the municipal lagoon infrastructure

has the capacity to accommodate this slight increase and wastewater flows with little to no impact on processing capacity.

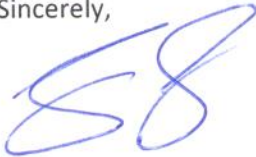
6. Summary

The effects of the proposed truck wash wastewater transfer to be negligible in magnitude and as such don't require further mitigation at this time. As supported by the information provided herein, HyLife Foods believes the residual environmental effects of the proposed effluent transfer are consistent with the classification of the request for alteration as minor.

As this is a time sensitive request, HyLife Foods would like to enact this transfer on March 27th, 2017 in order to meet the previously described objectives of alleviating loading into the R3 Innovations Inc. facility.

Thank you in advance for your consideration of this request and we await your response. Any further questions or concerns, please feel free to contact the undersigned at (204) 424-2313.

Sincerely,



Sheldon Stott
Director of Environmental Affairs
HyLife Ltd.

HyLife Foods LP

To: MINISTER OF FINANCE

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