



Environment and Climate

Environmental Approvals Branch
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File: 2755.20

June 9, 2023

Sheldon Stott
R3 Innovations Inc.
Box 1000
623 Main Street
Neepawa MB R3C 1A5
Sheldon.Stott@Hylife.com

Colleen Synchyshyn, CAO
Town of Neepawa
Box 339, 275 Hamilton Street
Neepawa, MB R0J 1H0
neepawacao@wcgwave.ca

Dear Sheldon Stott and Colleen Synchyshyn:

Re: R3 Innovations Inc. – Industrial Wastewater Transfer Notice of Alteration

Thank you for your notice of alteration dated May 30, 2023, concerning the transfer of industrial wastewater from the onsite lagoons adjacent to the R3 Innovation Inc. industrial wastewater treatment facility to the Town of Neepawa municipal wastewater treatment facility.

The requested alterations to the development as licensed include:

- Transferring industrial wastewater (on a one-time basis) generated from the HyLife hog processing facility and stored in Cell 3 of the old Springhill farms lagoon, located adjacent to R3 Innovations Inc., to Cell 1 of the Town of Neepawa municipal wastewater lagoon.
- Utilizing an overland pump and transfer line system for transferring the industrial wastewater, traveling across parcels of land owned by the Town of Neepawa and R3 Innovations Inc.
- Treating the transferred wastewater at the Town of Neepawa municipal wastewater treatment plant and discharging the effluent from the Town of Neepawa facility.

The assessment of the project was that effects on the environment would be insignificant. I concur with this assessment and so provide approval under section 14 (2)

of The Environment Act for the one-time transfer of industrial wastewater to the Town of Neepawa municipal wastewater treatment lagoon cell #1 subject to the following conditions:

1. R3 Innovations Inc. shall retain ownership of all industrial wastewater transferred to the Town of Neepawa municipal wastewater lagoon.
2. R3 Innovations Inc. shall maintain a 1 meter freeboard at the Town of Neepawa lagoon cell receiving the transferred wastewater, at all times.
3. R3 Innovations Inc. shall:
 - a) prepare a detailed wastewater treatment plan for the effective treatment of transferred industrial wastewater to meet all R3 Innovations Inc. wastewater effluent limits identified in Environment Act Licence No. 2870 RRR;
 - b) submit the detailed wastewater treatment plan, including nutrient loading (kg/day), nutrient concentrations (mg/L) and volumes (m³) for Total Nitrogen, Total Phosphorus, Total Ammonia as N (TAN) with expected pH, and Unionized Ammonia as N, and the maximum estimated concentration (mg/L) of Total Dissolved Solids and sulphate in wastewater effluent to the Director for review and approval; and
 - c) implement the plan as approved by the Director.
4. R3 Innovations Inc. shall only consider wastewater treatment options in accordance with Clause 3(a) of this letter that will allow for the land application of sludge from Cell 1 of the Town of Neepawa municipal wastewater treatment lagoon.
5. The Licensees shall obtain all necessary federal, provincial and/or municipal licences, authorizations, permits and/or approvals for construction of relevant components associated with the alterations to the Development prior to commencement of construction and/or operation.
6. The Licensees shall notify the assigned Environment Officer prior to set up and take down of the overland pumping and transfer system and prior to the commencement of wastewater pumping activities.
7. The Licensees shall have access on-site to all necessary equipment for use during the wastewater transfer activities.
8. The Licensees shall, at all times during the transfer of wastewater:
 - a) monitor the overland pump, transfer line system and lagoon freeboard level;
 - b) have effective spill equipment on site;
 - c) have a pumper truck on standby;
 - d) clearly and visibly mark all transfer lines and employ all necessary measures to ensure public safety; and
 - e) employ a person(s) dedicated to visually monitoring the river crossing.

9. The Licensees shall prepare and submit to the Director, within 2 months of the date of this letter, a detailed long-term plan for dealing with insufficient industrial wastewater treatment capabilities at R3 Innovations Inc. in the future. This plan must consider exploring options including but not limited to reducing processing rates at HyLife Foods Inc. and truck hauling wastewater to licensed industrial wastewater treatment facilities.
10. The Licensees shall, within 5 months of the date of this letter, complete an investigation into the cause of the R3 Innovations Inc. wastewater treatment plant failure and provide a report detailing what occurred and proposed mitigation measures so failures can be prevented in the future.
11. This approval terminates on June 30, 2023 for the one-time transfer of industrial wastewater to the Town of Neepawa municipal wastewater treatment lagoon cell #1.

All of the provisions of Environment Act Licence No. 2870 RRR remain in effect and are unchanged by this alteration. The treatment and subsequent discharge of the transferred industrial wastewater from the Town of Neepawa municipal wastewater treatment facility is not approved at this time until a plan per Clause 3 of this letter is approved.

For questions regarding this approval, please contact Jennifer Winsor, Senior Environmental Engineer, Environmental Approvals Branch, at Jennifer.Winsor@gov.mb.ca.

Sincerely,

Original Signed By
Agnes Wittmann
Director