



Conservation and Water Stewardship

Climate Change and Environmental Protection Division  
Environmental Approvals Branch  
123 Main Street, Suite 160, Winnipeg, Manitoba R3C 1A5  
T 204 945-8321 F 204 945-5229  
www.gov.mb.ca/conservation/eal

**File: 2755.20**

**File: 2754.10**

October 9, 2013

Mr. Sheldon Stott, P.Ag.  
HyLife Foods LP  
P.O. Box 100  
La Broquerie, MB R0A 0W0

Dear Mr. Stott:

**Re: HyLife Foods Pork Processing Plant Expansion and R3 Innovations/Town of Neepawa Wastewater Treatment Facility Expansion - Environment Act Proposals**

The initial reviews of the HyLife Foods Pork Processing Plant Expansion and R3 Innovations/Town of Neepawa Wastewater Treatment Facility Expansion Environment Act Proposals have been completed.

The reviews have generated requests for additional information. Please address and provide detailed responses to the comments and requests for additional information from the Technical Advisory Committee (TAC) that are presented in the attached items. The review process will continue upon receipt of your response.

If you have any questions, please contact me at 204-945-7012.

Yours truly,

*“Originally signed by”*

Jennifer Winsor, P.Eng.  
Environmental Approvals Branch

Enclosures

- c. Don Labossiere, Director – Environmental Compliance and Enforcement Branch,  
Manitoba Conservation and Water Stewardship  
Public Registries

## Winsor, Jennifer (CWS)

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**From:** Janusz, Lauren R (CWS)  
**Sent:** October-08-13 2:06 PM  
**To:** Winsor, Jennifer (CWS)  
**Cc:** Kitch, Ian (CWS); Long, Jeff (CWS); Bruederlin, Bruno (CWS); Kennedy, Joy (CWS)  
**Subject:** EAP 2755.20 R3 Innovations Wastewater and 2754.10 Hylife Pork Processing due September 30 2013

Hi Jennifer,

Fisheries Branch has reviewed this combined proposal for the construction and operation of upgrades to the existing HyLife Foods pork processing facility (increase production from 25,550 hogs/week to 37,500 hogs/week) and the expansion and operation of the R3 Innovations/Town of Neepawa IWWTF located in SW 35-14-15 W required to meet the increased processing demands. The proposed changes to the IWWTF development include the construction of an additional aeration tank, an extra blower unit, a third membrane cassette in each existing membrane train and replacement of centrifuge feed pumps. Up to 1200 m<sup>3</sup>/day of treated wastewater from the IWWTF would be discharged on a continuous basis via the existing effluent outfall pipeline into a low lying area with final discharge to the Whitemud River.

All wastewater from the pork processing operations as well as the sanitary services, hog receiving facility and on site truck wash is treated at the IWWTF. The proponent has indicated to date that they have been able to meet the effluent treatment requirements stipulated under their existing licence and will be able to do so under the expansion.

While we do not have any direct fisheries concerns with the proposed facility expansion we could have concerns with increased volume of effluent and effluent quality. The Whitemud River does provide year round habitat for a number of small and large bodied species. It is very important that the effluent meet or exceed the Manitoba Water Quality Standards, Objectives and Guidelines. While we defer to our colleagues in Water Quality Management with respect to what parameters and monitoring requirements the proponent should adhere to we do need more information with respect to effluent temperature.

One of the tables indicates that the effluent temperature is 25-30<sup>0</sup>C. Is this the discharge temperature? The proposal indicates that the effluent is not discharged directly into the Whitemud River but into a low lying area adjacent to the Whitemud River. There is no indication of how long that effluent is retained in the low lying area before it reaches the river and if the temperature of the effluent has changed at the point it enters the river. Has there been any comparison to background water temperatures and has there been any delineation of the plume based on temperature downstream of the discharge area? Depending on the information provided there may be the need to include a temperature requirement in the license but we would discuss this with Water Science Management once additional information has been provided.

Although construction works should not affect the Whitemud River we would still request that there be a licence condition that requires the proponent to implement erosion and sediment control measures as per clause 9 of the existing licence. Similarly the clause that addresses the application of biosolids, with respect to land application and minimum distances from surface water (clause 33 d, e and f) should also be included.

Thanks Jennifer.

Laureen Janusz  
Fisheries Science and Fish Culture Section  
Fisheries Branch  
Conservation and Water Stewardship

## **Winsor, Jennifer (CWS)**

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**From:** Roberts, Dan (CWS)  
**Sent:** October-03-13 11:40 AM  
**To:** Winsor, Jennifer (CWS)  
**Cc:** Rothnie, Ingrid (CWS)  
**Subject:** Review and comments due September 30, 2013 - File: 2755.20 R3 Innovations Wastewater and 2754.10 Hylife Pork Processing  
**Attachments:** Subdivision Drainage Plan Fact Sheet NEW MAY 2010.pdf

Hi Jennifer,

As the amount of outflow from the R3 Innovations Wastewater Plant into the Whitemud River will increase, the *Water Control Works and Drainage Licensing Section* requests the following:

- 1) Written approval from the immediate downstream landowners and the respective Rural Municipalities.
- 2) An engineered drainage plan, as per the attached specifications.
- 3) All water control works be licensed, as required under the *Water Rights Act*. Any inquiries in this regard may be directed to the local *Water Resource Officer*. Their contact information may be found at:

[http://www.gov.mb.ca/conservation/waterstewardship/licensing/pdf/areas\\_of\\_focus\\_jan\\_23\\_12.pdf](http://www.gov.mb.ca/conservation/waterstewardship/licensing/pdf/areas_of_focus_jan_23_12.pdf)

Licensing of yard and field approaches (access points) are the responsibility of either the municipality, or *Manitoba Infrastructure and Transportation*, which ever is applicable.

The drainage and/or alteration of permanent and semi-permanent wetlands is not permissible under the *Water Rights Act*.

Thank You,

**Dan Roberts**

Water Resource Officer  
Water Control Works and Drainage Licensing Section  
Conservation and Water Stewardship  
Box 640, 201 Fourth Ave. S., Swan River, MB R0L 1Z0  
Cell: (204) 281-2122, Fax: 734-3733



**Manitoba Water Stewardship  
Water Control Works and Drainage Licensing Section  
Subdivision Drainage Plan Requirements Fact Sheet**

This Factsheet is intended for proponents of urban residential, rural residential, urban commercial and rural commercial subdivision developments.

**The Water Rights Act as it relates to Subdivision Development**

*The Water Rights Act* suggests that no person shall control water or construct, establish or maintain any water control works unless he or she holds a valid license to do so.

Water control works are defined as any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert, borehole or contrivance for carrying or conducting water, that temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, OR changes or may change the location or direction of flow of water, including but not limited to water in a water body, by any means, including drainage.

If the proposal in question advocates any of these activities, please apply for a Water Rights License to Construct Water Control Works.

**Application for a Water Rights Licence**

- To apply for a water rights license, a completed license application form along with the license fee must be submitted to Manitoba Water Stewardship at the address indicated on the application form.
- Application forms can be obtained from Water Stewardship in Winnipeg or from Water Stewardship Regional Offices. Please contact either:

Eastern MB (Winnipeg, Capital Region and surrounding area)  
Geoff Reimer at (204) 467-4450, [geoff.reimer@gov.mb.ca](mailto:geoff.reimer@gov.mb.ca), Box 4558, Stonewall, MB R0C 2Z0

Western MB (Brandon and surrounding area)  
Ed Mackay at (204) 728-6226, [ed.mackay@gov.mb.ca](mailto:ed.mackay@gov.mb.ca), 1129 Queens Ave., Brandon, MB R7A 1L9

for more information concerning obtaining an application form or preparing and submitting a license application.

**Engineering Design and Analysis**

The following information is required in a subdivision development drainage plan submitted for review by Water Stewardship.

- With exceptions that may be granted by Water Stewardship, subdivision storm water management and drainage plans shall be designed by a professional engineer registered to practice in the Province of Manitoba. The construction of the water control works shall be in accordance with the methods and materials as specified by the engineer.
- The Applicant shall submit two (2) copies of the design drawings of the reservoir and associated works approved by the engineer to Water Stewardship for assessment.
- Developments totaling less than 10 lots (total) in size with lot sizes larger than 2 acres may, in some instances, be subject to less stringent engineering design requirements. Nevertheless, the design and construction of the project shall still be completed in accordance with acceptable engineering standards. The Applicant may be required to provide technical drawings showing design and construction details.
- Where Water Stewardship determines it to be appropriate, we may direct the Applicant to carry out an engineering analysis of hydrologic regime changes, potential physical impacts, and proposed mitigation measures.

## Drainage Plan Requirements:

### Hydraulic Design Requirements:

- Hydraulic design calculations are to be provided for review using a design scenario which details how post development storm water runoff rates of the subject property are to be equal to or less than pre development runoff rates subject to the following criteria.\*
- Site must be able to handle, up to and including, a 1 in 25 year design storm event. Ponding volume equals the difference between a 1 in 5 year allowable outflow and a 1 in 25 year post development flow hydrograph. The allowable outflow is the 1 in 5 year peak flow based on pre-development conditions. The ponding storage is typically accomplished through retention ponds or internal storage via ditches and drainage patterns
- The storm duration for the design should be 3 hours.
- Report must clearly detail:
  - Pre-development catchment area runoff volumes and rate for design event
  - Post development catchment area runoff volumes and rate for design event
  - Volume of water to be stored and proposed outflow rate
- In cases where increased post development runoff can not be accommodated within the development – the engineering plan must detail how the developer will mitigate negative downstream impacts that may result due to the increase in surface water flows.\*\*

\* Please note that if the development intends to outlet through Manitoba Infrastructure and Transportation infrastructure (highways or PR culvert) then different drainage standards may apply – please contact MIT for details

\*\* Mitigation may include the upgrading of existing drainage infrastructure such as culverts and drainage channels downstream to accommodate additional runoff.

### Engineered Site Plans Requirements:

- Detailed engineering plans outlining any construction, alteration, improvement, blocking or modification of new or existing drainage works servicing the property.
- Drain flow direction(s)
- Proposed/Existing culvert sizes and locations and/or schematics of any buried land drainage system
- Detailed design drawings of proposed storm water storage works
- Typical cross sections of proposed drains and ditches
- Existing and proposed geodetic lot grade elevations (in metric)
- Public right-of-ways or easements.
- Outlet of proposed drainage works (where the water exits the development) to be licensed in accordance to The Water Rights Act incorporating the above mentioned criteria.

The above list of requirements is specific to the surface water drainage aspect of a development only. Due to the nature of surface water drainage there are other agencies that may have input as to drainage standards and requirements due to the nature of their infrastructure and mandate. Agencies which may require further hydraulic and hydrologic information related to surface water runoff from subdivisions include:

- Manitoba Infrastructure and Transportation (MIT) – this Provincial Department owns and operates the provincial drain and public road system throughout Manitoba. Their road and drainage infrastructure is significantly impacted by surface water runoff, and if a development's drainage outlets through or into provincial infrastructure then MIT's approval will be required.
- Water Stewardship's Forecasting and Flood Coordination Branch may require minimum flood protection level (FPL) elevations if development is located within flood fringe area. Existing and proposed geodetic lot grade elevations (in metric) both on the site and on adjacent property, public right-of-ways or easements.
- Federal Department of Fisheries and Oceans (DFO) – any surface water drainage works that impact fish habitat will require the separate approval of DFO. DFO determines whether the proposed development will have a potential impact on fish habitat, and will require compensation for any potential destruction of fish habitat caused by alteration of existing drainage works. It is entirely the responsibility of the proponent to contact DFO in Winnipeg at (204) 983-5220.
- Your municipality
- Other regulatory agencies as required.

The approval of a drainage plan does not mean that developments that are adjacent to or encroaching on natural waterways are not at risk from overbank or overland flooding during extreme runoff events. There may be instances where overbank or overland flooding occurs during periods of extreme precipitation or spring runoff.



October 1<sup>st</sup>, 2013

Jennifer Winsor  
Environmental Approvals Branch  
Conservation and Water Stewardship  
123 Main Street, Suite 160  
Winnipeg, MB, R3C 1A5

Dear Jennifer Winsor,

**Re: R3 Innovations Inc. and Town of Neepawa Industrial Wastewater Treatment Facility Expansion –  
File: 2755.20**

I have reviewed the proposal and have the following general comments:

1. **Air Emissions:**
  - i. Ensure air emissions criteria will be met, including assessing the need for air dispersion monitoring if needed.
  - ii. Ensure odour control and monitoring.
2. **Water:**
  - i. Ensure containment design provides the best possible groundwater protection for the area.
  - ii. Consider ongoing leachate, soil and groundwater monitoring.
  - iii. Ensure prevention of pollutants or contaminated wastewaters from entering surface and/or groundwater systems.
3. **Waster/Chemicals:**
  - i. Ensure that any discharge of effluent or removal of effluent is in compliance with Manitoba Environment's guidelines.
  - ii. Ensure ongoing reporting and appropriate disposal of all hazardous wastes.
4. **Emergency Response Plan/Safety:**
  - i. Ensure availability for review of an emergency response plan.
  - ii. Fencing, gates, and warning signs to be included to ensure public safety, in case of unsupervised public access to the development.

**Re: Hylife Foods LP – Pork Processing Plant Expansion – File: 2754.10**

I have reviewed the proposal and have the following comments:

**1. Workplace Safety and Health:**

- a. Ensure Workplace Safety & Health Standards are applied to ensure the health of the workers at the pork processing plant is protected with the increased proposed development of this plant.

**2. Environment/Physical Health of the rural population surrounding this plant:**

- a. Ensure the physical health of the rural population surrounding this plant is protected by ensuring the points listed above regarding **File: 2755.20** are acknowledged.

**3. Social Implications**

- a. Social implications associated with the pork processing plant would be valuable to assess in order for harmonious relationships to be fostered between the surrounding rural community (including the workers at the plant) and the processing plant. It is important to manage the perceptions and concerns of the public and workers regarding the processing plant. As well, it is important that social integration of the plant (with the upcoming expansions) be enhanced by creating and maintaining a variety of links between the plant and the rural community.

Sincerely,

“Original Signed By”

Dr. Amy Frykoda, MD, CCFP, MSc  
Medical Officer of Health  
Prairie Mountain Health

cc Dr Susan Roberecki, Medical Lead - Environmental Health, Manitoba Health



**DATE:** September 30, 2013

## Memorandum

**TO:** Jennifer Windsor  
Land Use Approvals  
Environmental Assessment and  
Licensing Branch  
160-123 Main Street, Winnipeg,  
MB  
R3C 1A5

**FROM:** Joy Kennedy  
Water Quality Management Section  
Water Science and Management Branch  
160-123 Main Street, Winnipeg, MB  
R3C 1A5

**TELEPHONE:** 945-7908

**FACSIMILE:** 948-2357

**EMAIL:** joy.kennedy@gov.mb.ca

**Cc:** Nicole Armstrong  
Elaine Page

**SUBJECT:** *ENVIRONMENT ACT PROPOSAL FILE: 2755.20 HYLIFE FOODS  
PORK PROCESSING FACILITY AND R3 INNOVATIONS INC/TOWN OF  
NEEPAWA IWWF*

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We have reviewed the proposed wastewater treatment facility and have the following comments:

- The following effluent standards should be in place for HyLife Foods Pork Processing Facility and R3 Innovations Inc/Town of Neepawa IWWF. The Colony's wastewater lagoon as per the *Manitoba Water Quality Standards, Objectives and Guidelines Regulation (196/2011)*.
  - BOD<sub>5</sub> 25 mg/L
  - Total suspended solids 25 mg/L
  - Fecal Coliforms or *Escherichia coli* 200 MPN / 100mL
  - Total Nitrogen 15 mg/L
  - Total Phosphorus 1 mg/L
- The *Manitoba Water Quality Standards, Objectives and Guidelines Regulation (196/2011)* requires facilities that discharge continuously to meet a site specific guideline for total ammonia.
- The Water Quality Management Section is concerned with any discharges that have the potential to impact the aquatic environment and/or restrict present and future uses of the water. Therefore it is recommended that the license require the proponent to actively participate in any future watershed based management study, plan/or nutrient reduction program, approved by the Director.

Joy Kennedy



**Winsor, Jennifer (CWS)**

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**From:** Stibbard, James (CWS)  
**Sent:** September-26-13 12:00 PM  
**To:** Winsor, Jennifer (CWS)  
**Subject:** Re: 2754.10 Hilife Foods Expansion EAP

Ms. Winsor,

I reviewed the above noted EAP for concerns respecting drinking water safety. The potable water supply for the processing plant, coming from the Town of Neepawa public water system, will need to be protected from cross contamination as called for in *The Manitoba Plumbing Code*.

ODW has no other concerns with this EAP.

If you have any questions, please call.

Regards,

**James Stibbard P. Eng.**

Approvals Engineer

Office of Drinking Water

1007 Century Street

Winnipeg MB R3H 0W4

phone: (204) 945-5949

fax: (204) 945-1365

email: [James.Stibbard@gov.mb.ca](mailto:James.Stibbard@gov.mb.ca)

website: [www.manitoba.ca/drinkingwater](http://www.manitoba.ca/drinkingwater)

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## **Winsor, Jennifer (CWS)**

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**From:** Stibbard, James (CWS)  
**Sent:** September-26-13 11:26 AM  
**To:** Winsor, Jennifer (CWS)  
**Subject:** Re: 2755.20 R3 Hylife foods Wastewater Expansion EAP

Ms. Winsor,

I reviewed the above noted EAP for concerns respecting drinking water safety. The EAP notes that potable water from the Town of Neepawa public waer system is used as process water in the process. As such, the public water system will have to be protected from contamination with backflow/backsiphonage protection measures as required under *The Manitoba Plumbing Code*.

Beyond this point, ODW has no other causes for concern with this EAP or proposed project.

If you have any questions, please call.

Regards,

**James Stibbard P. Eng.**

Approvals Engineer  
Office of Drinking Water  
1007 Century Street  
Winnipeg MB R3H 0W4  
phone: (204) 945-5949  
fax: (204) 945-1365

email: [James.Stibbard@gov.mb.ca](mailto:James.Stibbard@gov.mb.ca)

website: [www.manitoba.ca/drinkingwater](http://www.manitoba.ca/drinkingwater)

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## **Winsor, Jennifer (CWS)**

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**From:** Kubish, Cheryl (OFC)  
**Sent:** September-20-13 11:49 AM  
**To:** Winsor, Jennifer (CWS)  
**Subject:** RE: Review and comments due September 30, 2013 - File: 2755.20 R3 Innovations Wastewater and 2754.10 Hylife Pork Processing

With respect to the proposed expansion and operation of the Hylife Foods processing plant, if there is any planned addition to the building floor area to accommodate this expansion, the Office of the Fire Commissioner (OFC) recommends that Building and Occupancy Permits be obtained from the authority having jurisdiction, that being the OFC located at 1601 Van Horne Avenue East, Brandon.

With respect to the expansion and operation of the R3 Innovations WWTF, the Office of the Fire commissioner has no comments at this time.

Cheryl Kubish  
Administrative Assistant  
Office of the Fire Commissioner  
508-401 York Avenue  
Winnipeg MB R3C 0P8  
Phone: 945-3328  
Fax: 948-2089

E-Mail address: [Cheryl.Kubish@gov.mb.ca](mailto:Cheryl.Kubish@gov.mb.ca)

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**From:** Steele, Tania (CWS)  
**Sent:** September-03-13 10:31 AM  
**To:** Schindler, Dennis (MAFRI); Wilson, Brian (MAFRI); Kaita, Adara (CWS); Labossiere, Don (CWS); Molod, Rommel (CWS); Streich, Laurie (CWS); Firlotte, Nicole (CWS); Kelly, Jason (CWS); Keenan, Phil (CWS); Missyabit, Ron (CWS); Page, Elaine (CWS); Phipps, Graham (CWS); Janusz, Laureen R (CWS); Stibbard, James (CWS); Matthews, Rob (CWS); Reimer, Geoff P (CWS); +WPG574 - HRB (CHT); Cunningham, Neil (CWS); Crone, Jim (IEM); Roberecki, Susan (HEALTH); Roberts, Tracy (HEALTH); +WPG969 - MIT Environmental Services Section (MIT); Shaler, Samantha (MLG); Allum, Brad (MIT); Schafer, Dave (OFC); Kubish, Cheryl (OFC); Armitt, Ernest (IEM); Lowdon, Keith (IEM); Prawdzik, Tim (CWS); Mlsanchuk, Lorne (CWS); Stonehouse, Perry (CWS)  
**Cc:** Winsor, Jennifer (CWS)  
**Subject:** Review and comments due September 30, 2013 - File: 2755.20 R3 Innovations Wastewater and 2754.10 Hylife Pork Processing

Your review and comments would be appreciated for the attached Proposal(s) submitted pursuant to *The Environment Act*:

<http://www.gov.mb.ca/conservation/eal/registries/2755.2r3innovations/index.html>  
<http://www.gov.mb.ca/conservation/eal/registries/2754.1hylife/index.html>

The contact person assigned to co-ordinate review and assessment of the Proposal(s) is:

**Contact Person: Jennifer Winsor @ 204-945-7012.** Email replies are programmed to automatically deliver to Jennifer Winsor.

Please indicate to the contact person if you are unable to review the proposal. A non-reply will be considered as indicating your department has reviewed the proposal and has no concerns.

## **Winsor, Jennifer (CWS)**

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**From:** Hagenson, Kayla (CWS)  
**Sent:** September-13-13 2:03 PM  
**To:** Winsor, Jennifer (CWS)  
**Subject:** Review and comments due September 30, 2013 - File: 2755.20 R3 Innovations Wastewater and 2754.10 Hylife Pork Processing

This department has the following comments with regards to the Hylife Pork Processing/R3 Innovations EAL alteration proposal:

- R3 Innovations in conjunction with Hylife Foods Pork Processing Facility should only have one point source of discharge to the Whitemud River. Therefore, all effluent generated at Hylife Foods Pork Processing Facility should be treated and discharged through the Industrial Wastewater Treatment Plant thereby ensuring proper treatment within the scope of the original proposal.
- No effluent is to be diverted to the Town of Neepawa Municipal Lagoon as the Town of Neepawa requires the full capacity of their facility to service the Town of Neepawa.

It should also be noted that the Clean Environment Commission Licence for the former Industrial Wastewater Treatment Lagoons should be reviewed and amended in order to indicate its current and future operations. Hylife has indicated they wish to utilize the former facility at times when the IWWTF may be down. Should that be the case an NoA should be provided to ensure the intended use meets the requirements of the licence. Also, there are components of the existing facility which are not functional/operational at this time and therefore use of the facility in its current state may not meet licence conditions.

Kayla Hagenson, *B.Env.Sc.*  
Environment Officer  
Conservation and Water Stewardship  
Environmental Compliance and Enforcement, Western Region  
27-2nd Ave SW  
Dauphin, MB R7N 3E5  
(204) 622-2316