

Environment Act Proposal - RW Packaging

200 Omand's Creek Blvd
Winnipeg, MB



Halket Environmental Consultants
January 15, 2016
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Executive Summary

RW Packaging Ltd., a pharmaceutical company, retained Halket Environmental Consultants Inc. (HEC) to prepare an Environment Act Proposal (EAP) for their Winnipeg manufacturing facility, in response to the November 2015 request of Manitoba Conservation and Water Stewardship (CWS). HEC assessed the facility's operations to determine their impact on air quality, noise, soils, surface water, groundwater, vegetation habitat and wildlife, socioeconomics, heritage resources, and public and employee health and safety.

RW Packaging blends and packages liquids and powders to make private brand consumer products for major retailers and national brand marketers across North America. The company was founded in Manitoba in 1919. Its state-of-the-art manufacturing facility located at 200 Omand's Creek Blvd was built in 2000 in accordance with Health Canada regulatory requirements for a drug manufacturing facility. The facility is a licensed Drug Establishment adhering to Good Manufacturing Practices Guidelines as required by Health Canada. RW Packaging has never had a Manitoba Environmental Act License.

All production activity is contained within the RW Packaging facility. Raw material is received via one of the five warehouse overhead doors, or pumped from a truck tanker or rail car to one of the three above-ground holding tanks on the east side of the building. The tanks are in good condition and licensed by CSW. There is no open outdoor storage of raw or finished product that could result in contaminated runoff from the site. There is no process water discharge from the facility to land or water; therefore no impacts to soil, surface water and groundwater are anticipated.

Detailed, written standard operation procedures govern all aspects of production. Quality control tracks, measures and tests raw material inventories, formulations and final products meticulously throughout the formulization, filling, and packaging processes. Minimal production waste occurs due to the value of the materials and strict adherence to formulations and quality control standards.

The application concludes that no adverse environmental effects are anticipated as a result of the continued operation of the facility.



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1.0 Introduction

RW Packaging blends and packages liquids and powders to make private brand consumer products for major retailers and national brand marketers across North America. The 35,000 square foot (3,251.6 square metre) manufacturing facility was built in 2000 to meet Health Canada regulatory requirements for a drug manufacturing facility. The facility is a currently licenced Drug Establishment adhering to Good Management Practices Guidelines as required by Health Canada. According to the Classes of Development Regulation M.R. 164/88, similar types of facilities are classified as Class I developments and therefore require licensing under the Environment Act through Manitoba Conservation and Water Stewardship (CWS). As requested by CWS in a letter to RW Packaging dated November 4, 2015, this Environment Act Proposal (EAP) has been prepared to support the application for an operating license for the RW Packaging facility.



2.0 Description of Development

2.1 Location and Ownership

The RW Packaging facility is located at 200 Omand's Creek Boulevard in the City of Winnipeg. The land comprises Lot 2, Plan 34840 WLTO in NW1/4 and SW1/4 23-11-2 EPM and in Closed Government Allowance. The land and facility are owned by RW Packaging. A Certificate of Title and Surveyor's Certificate are included in Appendix A. The owner of the mineral rights beneath the property is not explicitly noted on the Certificate of Title and therefore is assumed to be RW Packaging.

2.2 Property and Land-use

The RW Packaging property at 200 Omand's Creek Boulevard is located in the northwest region of the City of Winnipeg, within the Omand's Creek Industrial Park (Fig. 1).

The property is irregularly shaped and encompasses an area of 8,855.61 metres. It has a slightly curved 42.67 metre frontage on Omand's Creek Boulevard and a depth of 150.33 metres along its eastern edge. The western line boundary runs 115.01 metres to a slight jog and continues for 48.77 metres. The northern boundary is 80.02 metres in length.

According to the City of Winnipeg Zoning By-Law No. 200/2006, effective March 1, 2008, the property is zoned "M2" - Industrial District. Permitted uses in the "M2" zoning includes, but are not limited to: light manufacturing, processing, service, storage, wholesale, and distribution operations, with some limited outdoor operations and storage. The current use conforms to the zoning regulations.

Lands immediately adjacent to the east, west and south of the site are also zoned for industrial use, while the adjacent property to the north of the site (CNR and CPR rail lines) has been zoned for commercial use. The adjacent properties are:

- To the north lies a drainage ditch and the CNR and CPR rail spurs;
- To the south across Omand's Creek Boulevard is a mutli-tenant industrial building;
- To the east lies an industrial warehouse: and
- To the west lie two properties: the one to the north contains a 3,800,000 litre above ground storage tank and the one to the south a single-tenant industrial building.

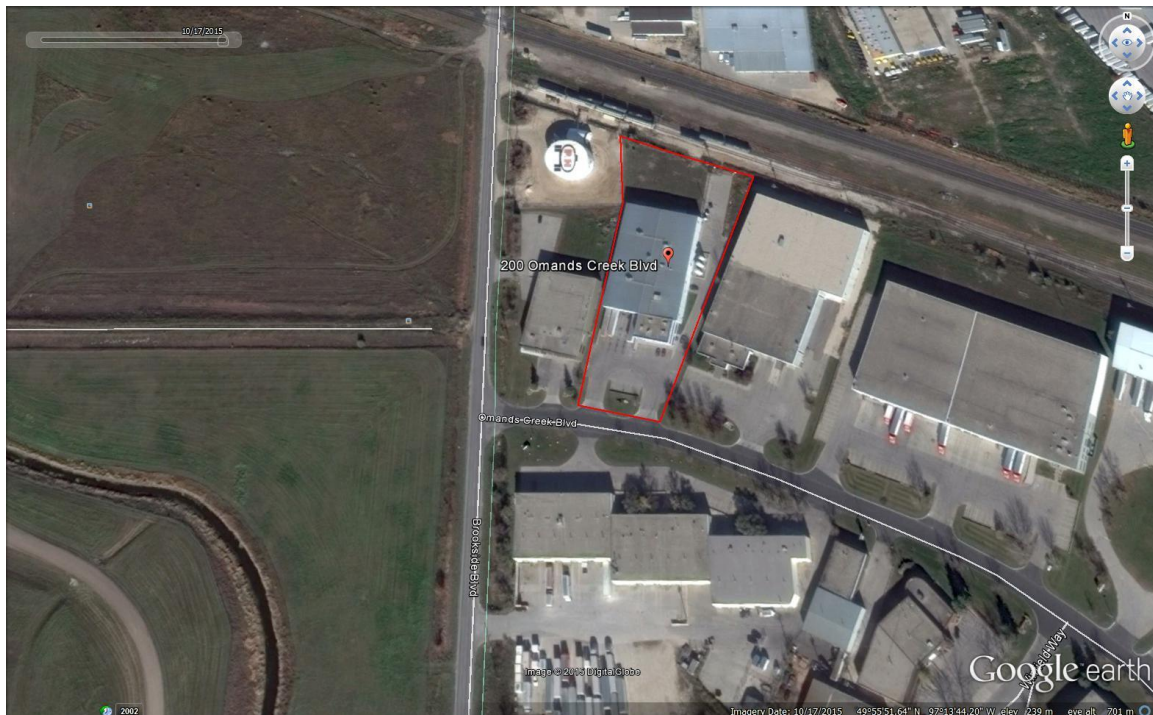


FIGURE 1: Satellite view of RW Packaging property (outlined in red). Photo courtesy of Google Earth, accessed on December 19, 2015.

2.3 Facility

The building on the property is a state of the art, 35,000 square foot (3,261.6 sq. m) manufacturing facility, custom designed and constructed in 2000.

The building includes:

- Manufacturing facilities – three clean rooms for formulating, filling and packaging of drug products and a warehouse with five dock level overhead doors and one oversized grade level overhead doors.
- Quality Control laboratory;
- Office Space with lunchroom, washrooms and computer server room.

A clean room is a specially designed room, akin to a surgical theater in a hospital, which can undergo a complete wash down. Special acrylic paint coats the walls, coved tiles cover the floor and turn ups, and ceiling tiles complete the enclosure. Lighting is sealed off, ventilation is

provided from the floor up, the air is filtered and monitored, temperature is controlled and the room is maintained at a positive air pressure. The entire building is equipped with a sprinkler system rated at FI fire protection level. The building is monitored by CCTV, alarmed and secured with key pad doors. The clean rooms are designed to act as a retention bowl for any spills. Each room is equipped with an open floor drain that drains to a sump pit and then to the sewer system.



On the outside of the building, along the east side, are three above ground liquid storage tanks (two with 26,000 litre and one with 26,500 litre capacity) enclosed within a concrete base pad and retaining walls. An Interim Permit has been issued to RW Packaging in accordance with the Dangerous Goods Handling and Transportation Act (C.C.S.M.c.D12)/The Storage and Handling of Petroleum Products and Allied Regulation M.R. 188/2001 until a renewed operating permit is issued. The application for the renewed operating permit was submitted to Manitoba Conservation and Water Stewardship on September 15, 2015.

There are no proposed plans for changes to the current facility.

2.4 Facility Licensing

The facility is a licenced Health Canada Drug Establishment adhering to Good Manufacturing Practices (GMP) and compliance certification registered to 9001:2008 quality standards. Health Canada has issued the following licences to RW Packaging:

- Drug Establishment Licence; and
- Natural Health Products Site Licence.

The facility is inspected every two years, at minimum, by Health Canada: Health Products and Food Program Inspectorate. Other external inspections also include Manitoba Agriculture, Food and Rural Initiatives and ISO Certification Audit and City of Winnipeg Fire Prevention Inspection, City of Winnipeg Water and Wastes Department and Zurich Insurance.

2.5 Production Process

RW Packaging blends and packages liquid and powder private brand consumer products for major retailers and national brand marketers across North America. The signed Standard Operating Procedures (SOP's) exist for all facets of the production process as well as for every product made in the facility.

Raw material is received via one of the five warehouse overhead doors or from a truck tanker or rail car pumped to the three above ground storage tanks on the east side of the building. Two of the tanks are dedicated to storing Isopropyl Alcohol 99% and the other to Rubbing Alcohol. Upon receipt, all raw materials are placed on hold until a QC inspection approves it for release to the manufacturing process.

The manufacturing process consists of two, custom designed stainless steel, liquid filling lines and two powder filling lines, each housed within separate clean rooms. Each liquid line consists of an electronic filler, capper, safety seal bander and labelling machine. Dedicated internal formulation tanks where liquids can be mixed feed to the lines. The two powder filling lines consist of a batch mixer and rotating product packaging machine.

Production is carried out once all materials have passed quality control testing. Products are packaged directly from bulk or batch formulations. The product produced is placed on hold until it is inspected and approved by quality control for final release before it is shipped to customers. The quality release of a product requires an independent assessment performed by a member of the Quality Team. It is based on pre-defined product specifications. Products produced at the plant are listed in Table I.

Quality control is a continuous process starting with raw material testing through to testing of the final product. RW Packaging maintains quality operating systems and procedures that are backed-up by written and computerized records, operating to cGMP (current Good Manufacturing Practices) and ISO standards. The Company's manufacturing records ensure complete traceability of the products produced, including full traceability after shipment to customers. The facility houses an in-house Quality Control Laboratory where testing of products and formulations are carried out.

All QC and Operations Management staff are required to hold University degrees in the Sciences, as well as, applicable Quality Control and Consumer Goods related experience. Staff are also trained in Health and Safety, WHIMIS, Production and Safety and Health SOPs and GMPs and Transport of Dangerous Goods.

Cleaning is carried out on a daily basis with floors being swept, garbage removed and table tops cleaned. Standard Operating Procedures are followed for sanitizing the production lines prior to product changeovers. A weekly sanitation is also carried out and includes complete washing of filling equipment, ledges, floors and other exposed areas.

Table I. Products produced at the facility.

Product	NPN/DPN
Calamine Lotion	00454575
Castor Oil	00167711
Camphorated Oil	00167762
Camphor Spirit	00399639
Epsom Salt	00167665
Eucalyptus Oil	00399620
Glycerin	00492434
Gripe Water Alcohol Free	02244627
Gripe Water Regular	01941372
Hydrogen Peroxide 3.0%	00167703
Hydrogen Peroxide 6.0%	01936476
Iodine Tincture 2.5%	00167754
Isopropyl Alcohol 70%	00167649
Isopropyl Alcohol 99%	00167657
Rubbing Alcohol	00167630

Witch Hazel	00430552
Wonder Oil	02247033
Mineral Oil Light	01935321
Mineral Oil Heavy	01935348
Epson Salts Scented	
Glycerin and Rosewater	
Olive Oil	
Distilled Water	

Source: RW Packaging, 2014.

2.6 Other Studies

AGRA Earth and Environmental conducted a Phase I Environmental Site Assessment in 2000 prior to development of the site. AGRA suggests – from a scrutiny of aerial photographs and other sources – that the site was in agricultural use until the late 1970’s when development of the Industrial Park began. The property remained a vacant lot until 2000. AGRA states in the conclusion of the report “that there is a low potential for significant environmental impacts to the subject property.”

3.0 Description of Existing Environment

The property is situated in the Winnipeg Ecodistrict, which lies in the central lowland of the Red River Plain. It is a flat to gently sloping, glaciolacustrine plain with a mean elevation of approximately 236 masl (Agriculture and Agri-Food Canada, 1998).

3.1 Climate

The region around Winnipeg experiences a dry continental climate, characterized by short, warm summers and long, cold winters. Precipitation varies on a seasonal basis with about three quarters of the total precipitation falling as rain and one quarter as snow.

The closest meteorological station to the property is the Winnipeg Richardson International Airport station. According to data, collected between 1981 and 2010, the daily average temperature ranged from -16.4 °C in January to 19.7 °C in July with an annual average of 3.0 °C. The mean annual precipitation is approximately 521 mm of which 419 mm falls as rain. Precipitation varies from year to year and is highest from late spring through summer. June has the highest average rainfall (90.0 mm) and January has the highest average snowfall (23.7 cm).

3.2 Geology, Surface Deposits and Soil

The general stratigraphy in the Winnipeg area consists of Pleistocene drift composed of Lake Agassiz silt and clay overlying silty till and Paleozoic carbonate bedrock.

The native surface soil complex consists of an organic rich layer overlying lacustrine and till deposits. Generally the soils in the general area of the Facility are variable and consist of predominantly imperfectly drained Vertisols and Black Chernozems which have developed on the glaciolacustrine sediments. Interbedded layers of lacustrine clay, silt, and fine grained sand underlie the organic soils to a depth of approximately 3 to 6 metres. Silty till underlies the lacustrine deposits.

The surficial deposits are underlain by Paleozoic limestones and dolomites of the Red River Formation. The bedrock in the area, approximately 9 to 12 metres below the surface belongs to the Gunn Member and consists of calcareous shale, interbedded with red and purple fossiliferous limestone.

3.3 Surface Water and Groundwater

The nearest stream is Omand's Creek, a tributary to the Assiniboine River, which runs along the western and southern side of Omand's Creek Industrial Park and lies approximately 250 metres away from the property. The property is separated from Omand's Creek by adjacent industrial properties to the west and south.

Run-off from the site is directed to and controlled by stormwater catch basins located within the property and along Omand's Creek Boulevard to the south and a ditch along the north side of the property. This area of Winnipeg is serviced by a separated storm and sanitary sewer system.

Fractured zones within the bedrock comprise the major aquifer in the area (AGRA, 2000). There are no aquifers above the bedrock (AGRA, 2000).

3.4 Vegetation, Wildlife and Habitat

The property consists of three distinct areas: the facility; paved parking and storage area; and a small field (Fig. 1). The vegetation in the field consists mostly of mown grass with typical weedy species. The ditch on the north side separating the field from the rail line supports cattail and wetland grasses. As the site is developed and within a larger industrial area, it does not provide any significant wildlife cover and it is unlikely that any wildlife sensitive to human disturbance would be present. Terrestrial and avian species potentially found in the project area would be limited to those found in Winnipeg.

Mr. Chris Friesen (5), Biodiversity Information Manager, Manitoba Conservation Data Centre (MCDC) completed a search of the MCDC rare species database and found no occurrences of federally or provincially listed species (Manitoba Endangered Species Act and Species At Risk Act) in the area (Appendix B).

3.5 Heritage Resources

Omand's Creek Park running along Omand's Creek to the south of the Industrial Park and Brookside Cemetery to the southeast are the nearest park and heritage properties to the RW Packaging property. However these properties are separated from the RW Packaging property by industrial properties.

3.6 Socioeconomics

RW Packaging, founded in 1919 in Winnipeg, has been operating at the site since 2000 and continues to contribute to the local, regional and provincial economy through direct and indirect employment. Currently, the manufacturing facility supports a staff of approximately 75 full-time employees. A substantial part of the business of a number of local companies depends on supplying materials for the manufacturing process at RW Packaging.

RW packaging supports a number of local (Manitoba & Alberta) charities each year including: **CancerCare, Variety Club, Fire Fighters Burn Fund, Breakfast for Learning, and Siloam Mission.**

RW Packaging shipped Distilled Water to New Orleans following Hurricane Katrina in 2005, provided health care products to the Haiti Earthquake relief efforts in 2010 and most recently sent health care products and cash donations collected by employees to support the Typhoon Haiyan relief efforts in the Philippines.

RW Packaging donates health care products to assist with **International Hope Canada, Canadian Food for Children** and **Health Partners of Canada** on-going humanitarian and relief efforts around the world. RW Packaging's Health Care product donations have been shipped to a number of countries including: Peru, Nicaragua, Ghana, Philippines, El Salvador and Zambia.

4.0 Description of Environmental Effects and Mitigation Measures

A potential environmental effect includes any change that the facility may cause to the environment (biological, physical, social and economic). Environmental effects were identified by evaluating activities associated with construction and operation of the facility and the following components.

4.1 Construction

Any potential adverse effects that may have occurred during construction of the RW Packaging facility would have been short term and happened over sixteen years ago. It is very unlikely that any of the construction effects would still be observable and therefore effects due to construction were not considered further. No new construction is proposed for the plant. Therefore, this assessment will focus on those effects potentially arising from the continued operation of the manufacturing facility.

4.2 Operation

Air quality

Receiving raw materials and shipping finished products may result in temporary increases in vehicle emissions and greenhouse gases. Trucks discharge their trailers at the warehouse doors and leave. Once a trailer is loaded, a truck is dispatched to pick up the trailer. Vehicle emissions arising from receiving and shipping activities are unlikely to exceed Manitoba's air quality guidelines. Fugitive dust levels are expected to be low because of the paved travel surfaces which are in good condition and span the shipping and receiving area and tank farm area. Therefore, the potential adverse effects on air quality in the local area were assessed to be minor. Mitigation measures to control greenhouse gases and vehicle emissions include requiring a high standard of maintenance for shipping vehicles and limiting unnecessary long-term idling.

Indoor air quality in the manufacturing plant is monitored and controlled by HVAC system. Air quality in the clean rooms is also temperature and pressure controlled, sampled on a regular basis according to GMPs and monitored by a ventilation system that removes and collects dust.

Noise

RW Packaging's operations are enclosed within the facility and these mixing operations produce very little noise. The City of Winnipeg's Neighborhood Livability By-law (2011) restricts industrial noise emissions within 150 m of residential developments. As the nearest residences are located over 600 m to the northeast, noise impacts are not considered to be of concern.

Waste

Production wastes are negligible (fractions of a percent) because of the strict adherence to formulations. All raw material inputs are measured at multiple stations along the product mixing lines and accounted for in the final product formulation as per Health Canada GMPs and internal SOPs. Non-hazardous solid wastes are separated. Recycled material is picked up by Emterra Group and refuse by Johnson Waste Management. Current operations produce wastewater which is released to the City of Winnipeg waste water system. The facility waste water discharge was inspected by the Sewer and Water Department in 2013. No follow-up action was required.

Laboratory wastes generated in the validation processes in the QC laboratory are stored in appropriate containers in the laboratory and picked up by Miller Environmental (Appendix DOC: QMP-042).

Soils, surface water and groundwater

All production activity is contained within the RW Packaging facility. There is no open outdoor storage of raw or finished product that could result in contaminated runoff from the site. There is no process water discharge from the RW Packaging facility to land or water; therefore no impacts to soil, surface water and groundwater are anticipated.

There are three above ground storage tanks on the east side of the building that feed into the facility. The tanks are sited on a concrete pad with concrete retaining walls on the perimeter. A tank inspection was conducted by J.A. Robinson on September 15, 2015. The tanks and retaining structures are inspected on annual basis by a licensed petroleum technician.

As detailed in the company's SOP two staff members trained in TDG oversee the filling of the tanks (Appendix C PDN SOP: 05). If any leakage is observed, the pump is shut down and spill containment procedures and devices immediately initiated and deployed in accordance with procedures detailed in Hazardous Material Spill Management DOC: WSH-015 (Appendix C).

Since all production activity is contained within the facility, no process water is released from the site, and SOPs in place to deal with emergencies, impacts to surrounding soils, surface water and groundwater are considered to be low.

Vegetation, Wildlife and Habitat

As the property was already developed and within an industrial area it does not provide any significant wildlife cover and it is unlikely that any wildlife sensitive to human disturbance would be present. Mr. Chris Friesen completed a search of the Manitoba Conservation Data Centre's rare species database and found no occurrences at this time for the area of interest.

Heritage Resources

There is no construction proposed at the RW Packaging property. The property is located in an existing industrial park. Therefore, there are no anticipated impacts to heritage resources as a result of the continued operation of this facility.

Public and Worker Safety

The public does not have access to the facility and therefore the project should not have any effect on public safety. The potential hazard to worker health and safety will be continuous while working in the manufacturing plant and was assessed as low. Mitigation measures already implemented include providing appropriate PPE for workers, signage warning about hazards, travelled areas, other safe work practices that complies with Manitoba Workplace Safety and Health Act and Canada Health regulations including Workplace Safety and Health SOPs (e.g. Appendix C DOC:WSH-016) conducting safety briefings with workers and providing employee training.

Workplace Health and Safety Meetings are held on regular intervals. The committee members consist of Management, Union representatives from Production, Distribution and Quality Control. Minutes are recorded and action items are checked for follow-up and completion. The accepted minutes are signed and copies sent to RW Management, UFCW Union and Manitoba Labour and Immigration. The minutes are also posted for all staff to see.

Reasonable precautions are in place to protect worker safety and, therefore, impacts on the public and staff are considered to be low.

5.0 Residual Effects

Based on the information presented on the facility and the surrounding environment and the assessment of environmental impacts in the previous sections combined with mitigation measures, the continued operation of the RW Packaging facility will not likely result in any significant residual adverse environmental effects.

6.0 Decommissioning

Decommissioning of the RW Packaging facility is not planned.

7.0 Limitations

This report was prepared by Halket Environmental Consultants for the sole benefit of RW Packaging. The material in this report reflects HEC's best judgement in light of the information available to HEC at the time of preparation. HEC accepts no responsibility for damages suffered by any third party as a result of decisions made or actions based on this report.



Ian Halket

Principal

Halket Environmental Consultants

1/15/2016

8.0 References

AGRA Earth and Environmental, 2001. **Phase I Environmental Site Assessment, 200 Omand's Creek Boulevard.**

Agriculture and Agri-Food Canada, 1998. **Terrestrial Ecozones, Ecoregions and Ecodistricts of Manitoba: An Ecological Stratification of Manitoba's Natural Landscapes.** Found on:

http://sis.agr.gc.ca/cansis/publications/ecostrat/provDescriptions/mbteee/mbteee_report.pdf

Agriculture and Agri-Food Canada, 2013. **National Ecological Framework.** Found on: <http://sis.agr.gc.ca/cansis/nsdb/ecostrat/index.html>

City of Winnipeg. 2008. **The City of Winnipeg Zoning By-law 200/06.** Found on: http://www.winnipeg.ca/ppd/bylaws/Bylaw200/By-law_200.2006.htm

Government of Canada. 2015. **Historical Climate Data.** Found on December 23, 2015: http://climate.weather.gc.ca/index_e.html

RW Packaging Ltd. 2014. Site Master File. Winnipeg, Manitoba.

Appendices



Appendix A

DATE: 2000/07/18
 TIME: 16:02
 POST

MANITOBA
 STATUS OF TITLE

TITLE NO: 1733991
 PAGE: 1

STATUS OF TITLE..... ACCEPTED
 ORIGINATING OFFICE..... WINNIPEG
 REGISTERING OFFICE..... WINNIPEG
 REGISTRATION DATE..... 2000/06/28
 COMPLETION DATE..... 2000/07/07

PRODUCED FOR: MYERS, WEINBERG & ASSOCIATES
 BY: M.DERKSEN
 LTO BOX NO: 175

LEGAL DESCRIPTION:

RW PACKAGING LTD.

IS REGISTERED OWNER SUBJECT TO SUCH ENTRIES RECORDED HEREBON, IN THE FOLLOWING DESCRIBED LAND:

LOT 2 PLAN 34840 WLTO
 IN NW 1/4 14 AND SW 1/4 23-11-2 EPM AND
 IN CLOSED GOVERNMENT ROAD ALLOWANCE

ACTIVE TITLE CHARGES:

255629	WPG ACCEPTED	CAVEAT	REG'D: 1978/09/20
	FROM/BY:	THE CITY OF WINNIPEG	
	TO:		
	CONSIDERATION:		NOTES:
262334	WPG ACCEPTED	CAVEAT	REG'D: 1979/07/03
	FROM/BY:	MAN. HYDRO ELECTRIC BOARD/MAN. TELEPHONE SYSTEM	
	TO:		
	CONSIDERATION:		NOTES:
81-53172	WPG ACCEPTED	CAVEAT	REG'D: 1981/06/17
	DESCRIPTION:	LOTS 1 & 2 PINK ON PLAN 15435, REG:DATE IS 1981-07-17	
	FROM/BY:	CANADIAN NATIONAL RAILWAY	
	TO:		
	CONSIDERATION:		NOTES: AFF;WTHN LTS R/W PL 15435
2244174	WPG ACCEPTED	CAVEAT	REG'D: 1998/03/19
	DESCRIPTION:	PLAN 35675 - R/W FOR HYDRO AND TELEPHONE EASEMENT	
	FROM/BY:	THE MANITOBA HYDRO-ELECTRIC BOARD AND MTS NETCOM INC.	
	TO:		
	CONSIDERATION:		NOTES: AFF WTN LTS R/W PL 35675

ACCEPTED THIS 28TH DAY OF JUNE, 2000
 BY W.BROWN FOR THE DISTRICT REGISTRAR OF
 THE LAND TITLES DISTRICT OF WINNIPEG.

CERTIFIED TRUE EXTRACT PRODUCED FROM THE LAND TITLES DATA
 STORAGE SYSTEM ON 2000/07/18 OF TITLE NUMBER 1733991 .
 THIS IS NOT A DUPLICATE TITLE.


 FOR THE DISTRICT REGISTRAR

***** END OF STATUS OF TITLE FOR-TITLE 1733991 WPG *****

A. L. HEGNER, M.L.S., F.L.S.
L. R. McLAUGHLIN, M.L.S., F.L.S.
D. W. ROBERTSON, M.L.S., F.L.S.

Telephone: 947-1337 Fax: 943-8024
Toll Free: 1-800-583-8818

POLLOCK & WRIGHT
LAND SURVEYORS

Main Office:
117 East Street
Winnipeg, Manitoba
R2C 1T6

Headquarters: 9:00 to 5:00
City Centre, Room 325
Winnipeg, Manitoba
R2C 4R7
Tel. 223-4415

SURVEYOR'S BUILDING LOCATION CERTIFICATE

January 16th, 2001

Our File No. 0101/23

Myers, Weinberg, Kussin, Weinstein, Bryk
Barristers and Solicitors
724 - 240 Graham Avenue
Winnipeg, Manitoba
R3C 0J7

Attention: Mr. Michael Kay

Dear Sir,

RE: Lot 2, Plan 34840 WLTO
in NW ¼ 14 and SW ¼ 23-11-2 EPM and
in closed Government Road Allowance

Certificate of Title: 1733991 [date of search: 2001/01/11]

Registered Owner: RW Packaging Ltd.


Encumbrances: Instrument Nos. 255629, 262334, 2244174, 2539503 and 81-53172 are registered against the above Certificate of Title.

This is to certify that I have made the necessary measurements to determine the position of a multi-level building un-numbered on the North side of Omands Creek Boulevard in the City of Winnipeg and find that the same above ground level is contained entirely within the limits of the above described land.

The two tanks and containment wall appurtenant to the said building are contained entirely within the limits of the above described land.

There are no encroachments above ground level onto the above described land by buildings from adjoining properties.

This survey was made on the 11th and 12th days of January, 2001.

 M.L.S.

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No person may copy, reproduce, transmit, or alter this document and no person may distribute or store copies of this document, in whole or in part.

SKETCH

Note: Survey monuments were not requested

PLEASE SEE ATTACHED SKETCH

63467

Drawn: Plan PL245/dry

A. C. POLLOCK, M.L.S., C.L.S.
L. N. WRIGHT, M.L.S., C.L.S.
D. N. BOURGEOIS, M.L.S., C.L.S.
Telephone: 947-1557 Fax: 943-8024
Toll Free: 1-800-343-8836

**POLLOCK & WRIGHT
LAND SURVEYORS**

Main Office:
117 East Street
Wilmington, North Carolina
28401
Hickoryville: 938 to 3-88
Cedar Grove: 800 to 3-77
Winkler: 336 to 3-77
2013 487
Tel: 333-2813
Date: 1/16/01

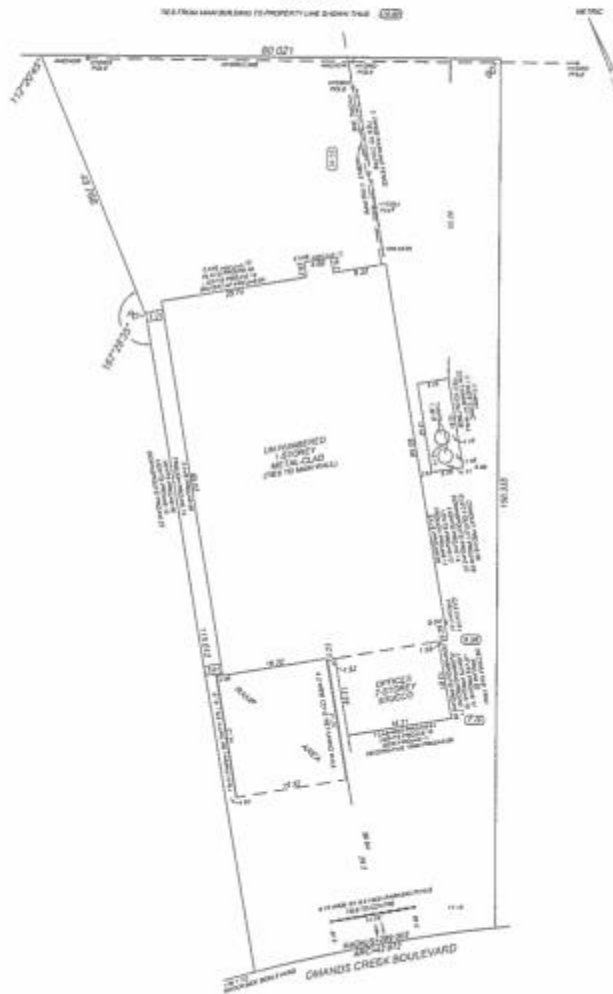
Attached to and forming part of
Building Location Certificate No. **63467**

Dated January 16th, 2001

D. Bourgeois, M.L.S.

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SKETCH



63467

1/16/01 DNB:WJG

Appendix B

Letter to confirm findings related to Manitoba Endangered Species Act and Species At Risk Act.

Ian

Thank you for your information request. I completed a search of the Manitoba Conservation Data Centre's rare species database and found no occurrences at this time for your area of interest.

The information provided in this letter is based on existing data known to the Manitoba Conservation Data Centre at the time of the request. These data are dependent on the research and observations of CDC staff and others who have shared their data, and reflect our current state of knowledge. An absence of data in any particular geographic area does not necessarily mean that species or ecological communities of concern are not present; in many areas, comprehensive surveys have never been completed. Therefore, this information should be regarded neither as a final statement on the occurrence of any species of concern, nor as a substitute for on-site surveys for species as part of environmental assessments.

Because the Manitoba CDC's Biotics database is continually updated and because information requests are evaluated by type of action, any given response is only appropriate for its respective request. Please contact the Manitoba CDC for an update on this natural heritage information if more than six months pass before it is utilized.

Third party requests for products wholly or partially derived from Biotics must be approved by the Manitoba CDC before information is released. Once approved, the primary user will identify the Manitoba CDC as data contributors on any map or publication using Biotics data, as follows as: Data developed by the Manitoba Conservation Data Centre; Wildlife Branch, Manitoba Conservation and Water Stewardship.

This letter is for information purposes only - it does not constitute consent or approval of the proposed project or activity, nor does it negate the need for any permits or approvals required by the Province of Manitoba.

We would be interested in receiving a copy of the results of any field surveys that you may undertake, to update our database with the most current knowledge of the area.

If you have any questions or require further information please contact me directly at (204) 945-7747.

Chris Friesen
Coordinator
Manitoba Conservation Data Centre
204-945-7747
chris.friesen@gov.mb.ca
<http://www.gov.mb.ca/conservation/cdc/>

-----Original Message-----

Sent: December-23-15 12:44 PM
To: Friesen, Chris (CWS)
Subject: WWW Form Submission

Below is the result of your feedback form. It was submitted by WWW Information Request () on Wednesday, December 23, 2015 at 12:43:38

DocumentID: Manitoba_Conservation

Project Title: 200 Omand's Creek Boulevard

Date Needed: 2016/1/5

Name: Ian Halket

Company/Organization: Halket Environmental Consultants

Address: 123 Sidebottom Drive

City: Winnipeg

Province/State: Manitoba

Phone: 204 583 7058

Email: ian@halketec.com


Project Description: Preparation of a Manitoba Environmental Act License Proposal for facility/property at 200 Omand's Creek Boulevard.

Information Requested: Screening of the database to identify and describe any rare or endangered species reported within the property or Omand's Creek Industrial Park

Format Requested: Microsoft excel spreadsheet or word doc, please

Location: 200 Omand's Creek Boulevard, Winnipeg, Manitoba.
Lot 2 Plan 34840 WLTO in NW1/4 and SW1/4 23-11-2 EPM.

Appendix C


	PRODUCTION STANDARD OPERATING PROCEDURES		CC#: 423	REV: 0	Page: 1 of 1
	SUBJECT: RAILCAR UNLOADING				
PDN SOP: 05	REVIEWED BY: <i>Clay</i>	QUALITY ASSURANCE	APPROVED BY: <i>BN</i>	President & CEO	August 12, 2013

1. **SCOPE**
The following outlines the procedure for safely connecting and unloading alcohol from the rail car.

2. **RESPONSIBILITIES**
Designated or assigned personnel from manufacturing with TDG training are responsible for unloading alcohol from the rail car. Two persons should be attending the job at all time, alternating through their break, taking turn monitoring the pump, hoses, and rail car.

3. **EQUIPMENT**
 - 3.1 Fife wrench: for opening the rail car bolts
 - 3.2 Ground cable: for grounding the rail car to the ground
 - 3.3 Pump
 - 3.4 Hoses
 - 3.5 Elbow fitting
 - 3.6 1" open wrench: for opening the outside tanks valve
 - 3.7 Lock: for locking the derailleur
 - 3.8 Loading Warning Sign
 - 3.9 20 L pail

4. **PROCEDURE**
 - 4.1 Visual inspection of the rail car, track and the derailleur, lock the derailleur, and put the warning sign up before proceeding.
 - 4.2 Chocked the rail car, and attach a ground cable.
 - 4.3 Climb the rail car, open the trap door and the pressure release valve, and close the trap door before climbing down the rail car.
 - 4.4 On the bottom of the rail car attach the elbow fitting for the hose, make sure all gaskets are intact, and put an empty 20 litres pail underneath.
 - 4.5 Connect all the hoses from the rail car to the pump to the outdoor holding tanks.
 - 4.6 Open the all valve from the holding tanks and reset the pump meter.
 - 4.7 Open the rail car release valve and check for any leaks from the hoses.
 - 4.8 Turn on the pump by plugging into the power socket.
 - 4.9 Check that the alcohol is flowing properly and make the walk around the hoses, and rail car every 10 to 15 mins for any possible leakage. **Reverse the procedures for closing.**

	SAFETY AND HEALTH PROGRAM MANUAL		CC# 597	REV: 1	Page: 1 of 2
	SUBJECT: HAZARDOUS MATERIAL SPILL MANAGEMENT				
DOC: WSH-015	REVIEWED BY: <i>LR</i>	Manager-Facility	APPROVED BY: <i>BL</i>	President & CEO	December 31, 2015

HAZARDOUS MATERIAL SPILL
(Winnipeg Facility)

Spill (Small or Large):

This section deals with spills that applies, but is not limited, to Production, Distribution or Quality Control. The spill may occur within the RW facility or outside, for example, during the transferring of the material.

Procedure:

1. Check to see if anyone has been contaminated by the spill.
 - Refer to the Safety Data Sheets for instructions for First Aid Measures.
 - Call 911 for an ambulance, if necessary.
2. Once a spill is noticed, ensure that it is contained as soon as possible.

MAJOR SPILL – may pose danger to workers and the environment

Contact Manager – Facility or designate. The Manager will:

- Determine whether the Fire Department needs to be contacted.
- Determine whether Miller Environmental needs to be contacted to organize the spill cleanup and/ or to provide guidance on the disposal.
 - Miller 24/7 Emergency Spill Line (204 957 6327) is able to provide guidance or send out a crew to clean up the disposal.

If it is safe to do so, clean up the spill using appropriate protective equipment (ie gloves, eye protection, etc).


FOR INDOOR SPILL:

- Close doors
- Collect the spill by absorbing it.
- Place spill into hazardous waste drum or barrel (marked 'Organic Wastes') for disposal.




FOR OUTDOOR SPILL:

TANK CAR UNLOADING SPILL: Immediately turn off power to the pump & truck. Close all valve from tank car, pump inlet valve (outside tank).

RAIL CAR UNLOADING SPILL: Immediately unplug the pump. Then, close the outlet valve under the rail car. Close the inlet valve to the outside tank.

	SAFETY AND HEALTH PROGRAM MANUAL		CC# 597	REV: 1	Page: 2 of 2
	SUBJECT: HAZARDOUS MATERIAL SPILL MANAGEMENT				
DOC: WSH-015	REVIEWED BY: <i>LR</i>	Manager-Facility	APPROVED BY: <i>JK</i>	President & CEO	December 31, 2015

<p>For all major outside spills:</p> <ul style="list-style-type: none"> • Contain and absorb liquid with non-combustible inert material (eg sand or earth). • Place spill into hazardous waste drum or barrel (marked 'Organic Wastes') for disposal.
<p>MINOR SPILL – easily contained & easily cleaned up</p>
<p>FOR INDOOR SPILL</p> <ul style="list-style-type: none"> • Absorb the spill and scoop up for disposal. • Place spill into hazardous waste drum or barrel (marked 'Organic Waste') for disposal. • Absorbing can be done with rags or mop and pail.
<p>FOR OUTDOOR SPILL</p> <ul style="list-style-type: none"> • Contain and absorb liquid with non-combustible inert material (eg sand or earth) • Place waste material into hazardous waste drum or barrel (marked 'Organic Wastes') for disposal.

	SAFETY AND HEALTH PROGRAM MANUAL		CC#:597	REV: 1	Page: 1 of 2
	SUBJECT: EMERGENCY MANAGEMENT PLAN				
DOC: WSH-016	REVIEWED BY: 	Manager-Facility	APPROVED BY: 	President & CEO	Dec 31, 2015

WORKPLACE EMERGENCY
(Winnipeg Facility)

NOTE: PERSON IN CHARGE – Manager, Team Leaders and Supervisors. In their absence, the person in charge is the most senior person present.

Evacuation of the facility may be required in case of extreme natural or man made emergency such as: fire, chemical spills, explosions and workplace violence resulting in bodily harm and trauma. It is an unforeseen situation that threatens the employees, disrupts or shuts down the operations or causes physical or environmental damage.




EVACUATION OF FACILITY:

The first employee who notices an emergency should:

- Activate the nearest fire alarm. Plan your exit.
- Evacuate the building through the nearest available exit.
- When feasible, Call 911 and provide the dispatcher with the following information:
 - Address
 - Brief description of emergency
 - Your name
- Immediately inform the Person in Charge or Manager – Facility.

Upon hearing the fire alarm, staff should:

- All machinery should immediately be stopped in a manner, which minimizes damage to the machine, and yet allows for a prompt departure.
 - If possible, ensure that emergency shut offs are closed.
- All employees shall **immediately** evacuate the premises through nearest available exit and move to the evacuation staging area.
 - Do not run or panic.

	SAFETY AND HEALTH PROGRAM MANUAL		CC#:597	REV: 1	Page: 2 of 2
	SUBJECT: EMERGENCY MANAGEMENT PLAN				
DOC: WSH-016	REVIEWED BY: 	Manager-Facility	APPROVED BY: 	President & CEO	Dec 31, 2015

- In fair weather, go to the front parking lot of the building (southeast corner of the parking lot). In inclement or very cold weather, go to one of the adjacent buildings next door, if they are opened.
- No employee is to take shelter in any vehicle.
Exception: In adverse or very cold weather shift employees may take shelter in vehicles that are parked in the front parking lot, facing the street.
- However, no vehicle is to be started unless authorized by Fire Department personnel.
- Person in Charge will assist in the orderly egress of all employees to the staging area.
 - Keep streets, fire lanes, hydrant and walk ways clear for emergency vehicles and crew.
- Person in Charge will perform a roll call to determine if any employees are still in the building, and if any visitors are unaccounted for. For the Administration staff, Exec VP / designate will perform roll call.
- Once the roll calls are complete, provide this information to the Fire Department upon arrival.
- **Under no circumstances is any RW Packaging Ltd. employee to return to the evacuated building unless told to do so.**
- Manager-Facility will deal with the Fire Department/ First Aide Responders regarding the situation.




REQUIRING MEDICAL AID

Production Supervisors and Formulator has their First Aide Certification. Seek them out for any required medical support.

Emergency Numbers:
Poison Control – 1 855 7POISON or 1 855 776 4767

Fire / Ambulance /Police – 911

Miller Environmental 24/7 Emergency Spill Line – 204 957 6327

	QUALITY MANAGEMENT PROCEDURE		REV: 0	Page: 1 of 1	
	SUBJECT: ORGANIC WASTE DISPOSAL				
DOC: QMP-042	REVIEWED BY: 	Quality Assurance	APPROVED BY: 	President & CEO	January 5, 2016

1.0 PURPOSE:

1.1 To define the process in which organic waste is disposed.

2.0 RESPONSIBILITIES:

2.1 Production and Lab personnel.

3.0 PROCEDURE:

3.1 Production

3.1.1 Drums must be labeled and dedicated for organic waste.

3.1.2 All organic waste must be collected in drums.

3.1.3 Filled drums must be sealed and stored in a location away from production.

3.2 Lab

3.2.1 Dedicated containers must be assigned for specific lab waste, including acids, reagents and organic.

3.2.2 Containers must be securely placed in the fume hood.

3.2.3 If organic waste is in large amounts, it must be placed in the labeled organic waste drums located in production

3.2.4 Filled containers must be placed in the chemical cabinet in the supply room.

3.3 Discarding organic and lab waste

3.3.1 Twice a year or when the waste drums and containers are full; Miller environmental must be contacted for waste disposal.