

Black, Brenda ENV:EX

From: Caunce, Cassandra ENV:EX
Sent: Friday, January 6, 2012 2:09 PM
To: Black, Brenda ENV:EX
Subject: FW: May 6th inspection of the Clean Harbors Delta, BC facility (Permit No. PS (RS) - 8388) : Update information respecting completion of corrective actions addressing inspection findings.
Attachments: CleanHarborsDelta_MoEinspectn110506_corractsltr_efl111130.pdf

Cleaning out my email - For the file

Cassandra

Section Head, Environmental Management - Business & Standards
Ministry of Environment
(p:) 604.582-5299

From: Flanagan, Eric [<mailto:flanagan.william@cleanharbors.com>]
Sent: Wednesday, November 30, 2011 11:31 AM
To: Caunce, Cassandra ENV:EX
Cc: MA, WAYNE
Subject: May 6th inspection of the Clean Harbors Delta, BC facility (Permit No. PS (RS) - 8388) : Update information respecting completion of corrective actions addressing inspection findings.

Cassandra :

Please find attached a letter containing updated information respecting the completion of corrective actions implemented to address the findings documented in the July 07 2011 Ministry of Environment letter summarizing the May 06 2011 site inspection of the Clean Harbors Delta Waste Management Facility (Waste Management Act Permit RS-08388 (PS-8388)).

Again, ... as before, I hope this e-mail finds you doing well today and throughout this 'late fall/early winter season'.

Sincerely,

Eric Flanagan

Facility Environmental Compliance Manager
Clean Harbors Environmental Services
P.O. Box 390
Riley, Alberta
T0B4A0
Office: 780.663.2522
Cellular: 587.986.8027
Fax: 780.663.3539
Email: flanagan.william@cleanharbors.com
Web: www.cleanharbors.com

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Clean Harbors Canada Inc.
7842 Progress Way
Delta, British Columbia V4G 1A4
604.940.0894
Facsimile 604.940.1423
www.cleanharbors.com

November 30, 2011

Business & Standards Unit, Lower Mainland Region
Environmental Management Section
Regional Operations, Ministry of Environment
10470 – 152 Street
Surrey, British Columbia V3R 0Y3

Attention: Cassandra Caunce

**Re: Clean Harbors Environmental Services Delta Waste Management Facility
Waste Management Act Permit No.RS-08388 (PS-8388)
Actions addressing Ministry of Environment Site Inspection May 06 2011**

This letter provides update information on the status of corrective actions implemented to address findings documented by the Ministry of Environment in a letter dated July 07 2011 based on observations made during a site inspection conducted by the Ministry on May 06 2011.

Three observations were made during the inspection respecting site situations that may not have been in compliance with specific sections of the Hazardous Waste Regulation at the time of inspection. These items were presented in the Ministry letter in a table as follows:

Hazardous Waste Regulation (citation)	Inspection Finding
Section 5: Waste Information	Discussed increasing signage in loading and storing areas to identify groups of wastes and their hazards.
Section 8: Access Security	Side Gate was open.
Section 10: Spill Protection and Reporting	Berms for the lugger pad and tank farm have been worn down and appear to be compromised.

Actions completed to date intended to rectify the observed situations are described in the following table:

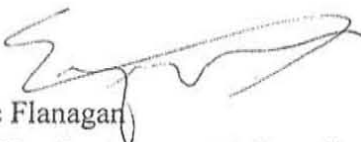
Finding Hazardous Waste Regulation Section Reference	Corrective Actions	Latest Status
Section 5: Waste Information	A project to have signs made for hanging on the walls and from the ceiling supports in the loading and storage areas has been initiated.	Installation of signs completed November 18 2011.
Section 8: Access Security	A spring has been installed on the gate so that it closes automatically. Additionally, a sign instructing users to keep the gate closed was installed at this gate location.	Completed earlier this year (reference previously submitted letter dated August 05 2011).
Section 10: Spill Protection and Reporting	An engineering project has been developed to replace the tank farm and lugger pad loading areas truck access berms. Quotes have been requested from two different contractors.	Repairs to berms using asphalt completed October 17 2011.

Clean Harbors believes that the corrective actions described in the preceding table have rectified the situations that may have not been in compliance with the sections of the Hazardous Waste Regulation noted by the Ministry of Environment.

As a further improvement to the berms providing spill protection for the tank farm and lugger pad loading areas access, a project has been proposed for 2012 that will replace the asphalt berms with concrete berms.

If you would like to discuss any of the corrective actions implemented to address the identified situations observed during the site inspection, please do not hesitate to contact me at (780) 663-2522 or Wayne Ma, the Facility General Manager, at (604) 940-5112.

Sincerely,
Clean Harbors Environmental Services Inc.



Eric Flanagan
Facility Environmental Compliance Manager, Western Canada

Cc: Wayne Ma, Clean Harbors Delta Facility General Manager

Enick, Oana V ENV:EX

From: Flanagan, Eric [flanagan.william@cleanharbors.com]
Sent: Friday, August 5, 2011 2:22 PM
To: Counce, Cassandra ENV:EX
Cc: Enick, Oana V ENV:EX; Armour, Christine A FLNR:EX; MA, WAYNE
Subject: FW: May 6th inspection of the Delta, BC facility
Attachments: May 6 Inspection report.pdf; CleanHarborsDelta_MoEinspectn110506_corraclsitr_efl110805.pdf

Cassandra (also Oana and Christine !) :

Please find attached a letter being our 'written response' to the July 7 2011 Ministry of Environment letter 'follow-up' to the May 06 2011 site inspection of the Clean Harbors Delta Waste Management Facility (Waste Management Act Permit RS-08388 (PS-8388)).

Cassandra: as I'm forwarding Oana's e-mail transmission of this morning; you will also find attached a copy of the Ministry 'inspection follow-up' letter of July 7 2011; signed by Oana and provided to us this morning (our having received a copy of this letter in an e-mail sent to us back on July 22nd by Christine; see e-mail chain 'below').

P.S. I appreciate all of the 'lines open for communication' we've had between ourselves on this matter. If you need to discuss anything with me, I am at your service.

Hoping this e-mail finds everyone doing well today and with a nice weekend ahead for you.

Sincerely,

Eric Flanagan

Facility Environmental Compliance Manager
Clean Harbors Environmental Services

P.O. Box 390

Ryley, Alberta

T0B4A0

Office: 780.663.2522

Cellular:587.986.8027

Fax: 780.663.3539

Email: flanagan.william@cleanharbors.com

Web: www.cleanharbors.com

From: Enick, Oana V ENV:EX [mailto:Oana.Enick@gov.bc.ca]
Sent: Friday, August 05, 2011 9:01 AM
To: Flanagan, Eric
Cc: Armour, Christine A FLNR:EX; MA, WAYNE
Subject: RE: May 6th inspection of the Delta, BC facility

Hi Erick, Christine, Wayne:

Sorry about confusion. Thank you for following up Christine, and thank you for coordinating with her Eric. The date on the letter has not changed, so just continue on the arrangements you've made. Please let us know if the delay will require additional time from us, otherwise, once again, please accept my apologies for the delay.

I attached a copy of the letter that went out this morning.

Thanks, Oana.

Oana Enick, P.Ag., M.E.T.
Environmental Protection Officer
Environmental Management
Ministry of Environment
Lower Mainland Region
ph: (604) 582-5270 fax: (604) 584-9751

From: Flanagan, Eric [mailto:flanagan.william@cleanharbors.com]
Sent: Thursday, August 4, 2011 1:43 PM
To: Enick, Oana V ENV:EX
Cc: Armour, Christine A FLNR:EX; MA, WAYNE
Subject: RE: May 6th inspection of the Delta, BC facility

Oana :

I spoke with Christine on the telephone some minutes ago and we were thinking to 'respond' to the 'e-mail attached' version of the letter (i.e. the version dated July 7, 2011).

Has the date of the 'signed' letter changed (and consequently should I reference the changed date if there was a change to the date of the letter ?).

Otherwise ; I can still 'word' our response letter to 'reference' the July 22nd e-mail 'attached' letter so there's no confusion ; and I'll still get this letter 'off' before tomorrow end of day if all goes well ?

Eric.

Eric Flanagan
Facility Environmental Compliance Manager
Clean Harbors Environmental Services
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T0B4A0
Office: 780.663.2522
Cellular:587.986.8027
Fax: 780.663.3539
Email: flanagan.william@cleanharbors.com
Web: www.cleanharbors.com

From: Enick, Oana V ENV:EX [mailto:Oana.Enick@gov.bc.ca]
Sent: Thursday, August 04, 2011 2:35 PM
To: Flanagan, Eric
Cc: Armour, Christine A FLNR:EX
Subject: RE: May 6th inspection of the Delta, BC facility

Hi Eric:

The signed letter was the last thing I did before leaving on holidays. I found it on my desk on my return yesterday. Please accept my apologies for the delay. It will be in the mail tomorrow morning. Thanks, Oana.

From: Flanagan, Eric [mailto:flanagan.william@cleanharbors.com]
Sent: Thu, August 4, 2011 1:19 PM
To: Armour, Christine A FLNR:EX
Cc: Enick, Oana V ENV:EX; MA, WAYNE
Subject: RE: May 6th inspection of the Delta, BC facility

Christine (... or Oana ?) :

I was talking to Wayne Ma a little while ago today and the "signed letter" indicated as 'being sent' to Wayne at the Clean Harbors Delta site has not been received yet ?

The 'soft copy' of this letter (that was attached to Christine's initiating e-mail 'below') ... to the attention of Wayne and myself was dated "July 7 2011" and was asking for a response in writing within 30 days of the date of this letter. If I'm not mistaken thirty days from the July 07th 2011 date would be August 05th (tomorrow) ?

Can you advise us whether the letter being sent to Wayne should have been received by now ?

If the contents of the letter reflects what was in the 'soft copy' e-mailed by Christine on July 22nd ; we can respond to the 'soft copy' version of the letter.

Please advise (... please call me if you have information we should be apprised of pertinent to the requested 'response in writing').

Hoping this e-mail transmission finds everyone having a nice day today.

Eric.

Eric Flanagan

*Facility Environmental Compliance Manager
Clean Harbors Environmental Services
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Fax: 780.663.3539
Email: flanagan.william@cleanharbors.com
Web: www.cleanharbors.com*

From: Armour, Christine A FLNR:EX [mailto:Christine.Armour@gov.bc.ca]
Sent: Friday, July 22, 2011 4:48 PM
To: Flanagan, Eric
Cc: Enick, Oana V ENV:EX
Subject: May 6th inspection of the Delta, BC facility

Hi Eric,

Apologies for the delays – the signed letter is being sent out to Wayne from Oana Enick.

I'm attaching a copy for you and a copy of the inspection form from May 6th, 2011. Normally, just a letter with the findings is sent out but we had talked about getting a copy of the actual inspection to you because you're getting to know BC legislation and the facilities.

Also attached are some photos from the site visit, any questions give me a call.

Christine

Christine Armour, RPF
Compliance and Enforcement Forester
Squamish Field Unit
Ministry of Forests, Lands and Natural Resource Operations
phone: (604) 898-2112

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COPY

August 05, 2011

Business & Standards Unit, Lower Mainland Region
Environmental Management Section
Regional Operations, Ministry of Environment
10470 – 152 Street
Surrey, British Columbia V3R 0Y3

**Re: Clean Harbors Environmental Services Delta Waste Management Facility
Waste Management Act Permit No.RS-08388 (PS-8388)
Ministry of Environment Site Inspection May 06 2011**

Please accept this letter in response to a letter from the Ministry of Environment dated July 7 2011 conveying follow-up information related to the site inspection conducted by the Ministry on May 06 2011.

Three observations were made during the inspection respecting site situations that may not have been in compliance with specific sections of the Hazardous Waste Regulation at the time of inspection. These items were presented in the Ministry letter in a table as follows:

Hazardous Waste Regulation (citation)	Inspection Finding
Section 5: Waste Information	Discussed increasing signage in loading and storing areas to identify groups of wastes and their hazards.
Section 8: Access Security	Side Gate was open.
Section 10: Spill Protection and Reporting	Berms for the lugger pad and tank farm have been worn down and appear to be compromised.

Actions to rectify the observed situations are described in the following table:

"People and Technology Creating a Better Environment"



Finding Hazardous Waste Regulation Section Reference	Corrective Actions	Status
Section 5: Waste Information	A project to have signs made for hanging on the walls and from the ceiling supports in the loading and storage areas has been initiated.	Request for quote being submitted to vendor on August 05th 2011. Estimated completion date – August 31 2011.
Section 8: Access Security	A spring has been installed on the gate so that it closes automatically. Additionally, a sign instructing users to keep the gate closed was installed at this gate location.	Completed.
Section 10: Spill Protection and Reporting	An engineering project has been developed to replace the tank farm and lugger pad loading areas truck access berms. Quotes have been requested from two different contractors.	Quote received from one contractor. Second contractor scheduled to visit site on August 05 2011 in preparation for providing a quote on the berm replacement. Estimated completion date – September 16 2011.

Clean Harbors believes that the corrective actions described in the preceding table will rectify the situations that may have not been in compliance with the sections of the Hazardous Waste Regulation noted by the Ministry of Environment.

If you would like to discuss any of the corrective actions we are implementing to address the identified situations observed during the site inspection, please do not hesitate to contact me at (780) 663-2522 or Wayne Ma, the Facility General Manager, at (604) 940-5112.

Sincerely,
Clean Harbors Canada, Inc.

Eric Flanagan
Facility Environmental Compliance Manager

"People and Technology Creating a Better Environment"



Date: July 7, 2011

File: RS-08388

Clean Harbors Environmental Services
7842 Progress Way
Delta, British Columbia
V4G 1A4

Attention: Wayne Ma and Eric Flanagan

Dear Sirs:

**Re: Site Inspection of Clean Harbors Environmental Services
Located at: 7842 Progress Way, Delta, British Columbia**

This letter is in follow up to the site inspection conducted by Ministry of Environment (Ministry) staff on May 6, 2011 at the Clean Harbors Environmental Services facility located at 7842 Progress Way, Delta, British Columbia. This letter shall not be construed as a waiver of any lawful requirement pertaining to the unauthorized discharge of waste to the environment, and is without prejudice to any further legal action that the Ministry may take under the *Environmental Management Act (Act)*.

The June 30, 2009 site inspection was completed as part of routine Ministry operations in the Lower Mainland region. This inspection was based on the *Hazardous Waste Regulation (HWR)*, but does not represent a comprehensive inspection. Although this inspection was limited to various sections of the *HWR*, please be advised that all requirements of the *Environmental Management Act (the Act)* and the *HWR* must be complied with at all times. Failure to comply is a violation of the *Act* and may be subject to legal action.

For your reference, the *Act* and the *HWR* can be found at the following websites, respectively:
http://www.qp.gov.bc.ca/statreg/stat/E/03053_00.htm
http://www.qp.gov.bc.ca/statreg/reg/E/EnvMgmt/EnvMgmt63_88/63_88.htm

Results of the inspection conducted on May 6, 2011 indicate that the facility located at 7842 Progress Way, Delta, British Columbia, may not be in compliance with sections of the *HWR* specified in the table below.

HWR	Inspection Finding
Section 5: Waste Information	Discussed increasing signage in loading and storing areas to identify groups of wastes and their hazards.
Section 8: Access Security	Side Gate was open.
Section 10: Spill Protection and Reporting	Berms for the lugger pad and tank farm have been worn down and appear to be compromised.

Please respond in writing to the Ministry within 30 days of the date of this letter, identifying actions to rectify these issues of non-compliance. Please include a schedule for implementing these actions.

The Ministry looks forward to working with you to bring your facility into full and continuous compliance with the *HWR*. If you have any questions, or wish to discuss this matter further, please contact Oana Enick at (604) 582-5332 or via e-mail at Oana.Enick@gov.bc.ca.

Sincerely,



Oana Enick
Environmental Protection Officer
Environmental Protection Section
Ministry of Environment, Lower Mainland Region



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www.cleanharbors.com

August 05, 2011

Business & Standards Unit, Lower Mainland Region
Environmental Management Section
Regional Operations, Ministry of Environment
10470 – 152 Street
Surrey, British Columbia V3R 0Y3

**Re: Clean Harbors Environmental Services Delta Waste Management Facility
Waste Management Act Permit No.RS-08388 (PS-8388)
Ministry of Environment Site Inspection May 06 2011**

Please accept this letter in response to a letter from the Ministry of Environment dated July 7 2011 conveying follow-up information related to the site inspection conducted by the Ministry on May 06 2011.

Three observations were made during the inspection respecting site situations that may not have been in compliance with specific sections of the Hazardous Waste Regulation at the time of inspection. These items were presented in the Ministry letter in a table as follows:

Hazardous Waste Regulation (citation)	Inspection Finding
Section 5: Waste Information	Discussed increasing signage in loading and storing areas to identify groups of wastes and their hazards.
Section 8: Access Security	Side Gate was open.
Section 10: Spill Protection and Reporting	Berms for the lugger pad and tank farm have been worn down and appear to be compromised.

Actions to rectify the observed situations are described in the following table:



Finding Hazardous Waste Regulation Section Reference	Corrective Actions	Status
Section 5: Waste Information	A project to have signs made for hanging on the walls and from the ceiling supports in the loading and storage areas has been initiated.	Request for quote being submitted to vendor on August 05th 2011. Estimated completion date – August 31 2011.
Section 8: Access Security	A spring has been installed on the gate so that it closes automatically. Additionally, a sign instructing users to keep the gate closed was installed at this gate location.	Completed.
Section 10: Spill Protection and Reporting	An engineering project has been developed to replace the tank farm and lugger pad loading areas truck access berms. Quotes have been requested from two different contractors.	Quote received from one contractor. Second contractor scheduled to visit site on August 05 2011 in preparation for providing a quote on the berm replacement. Estimated completion date – September 16 2011.

Clean Harbors believes that the corrective actions described in the preceding table will rectify the situations that may have not been in compliance with the sections of the Hazardous Waste Regulation noted by the Ministry of Environment.

If you would like to discuss any of the corrective actions we are implementing to address the identified situations observed during the site inspection, please do not hesitate to contact me at (780) 663-2522 or Wayne Ma, the Facility General Manager, at (604) 940-5112.

Sincerely,
Clean Harbors Canada, Inc.

Eric Flanagan
Facility Environmental Compliance Manager

Enick, Oana V ENV:EX

From: Enick, Oana V ENV:EX
Sent: Friday, July 22, 2011 4:10 PM
To: Armour, Christine A FLNR:EX
Cc: Caunce, Cassandra ENV:EX
Subject: RE: Operational Plan for Clean Harbors

That's excellent Christine. Thanks for your thoughtful approach to this. That's pretty good relationship building skills!

For the last couple of weeks, Cassandra has been fielding all questions relating to hazardous waste. So, by copy of this e-mail Cassandra, I will let you answer Christine's questions relating to a timeline for Clean Harbors' operational plan.

Thank you both and have a great weekend, Oana.

Oana Enick, P.Ag., M.E.T.
Environmental Protection Officer
Environmental Management
Ministry of Environment
Lower Mainland Region
ph: (604) 582-5270 fax: (604) 584-9751

From: Armour, Christine A FLNR:EX
Sent: Friday, July 22, 2011 3:58 PM
To: Enick, Oana V ENV:EX
Subject: Operational Plan for Clean Harbors

Hi Oana,

I spoke to Eric Flanagan the new Western Canada Regional Manager for Clean Harbors on July 14th, 2011. We were discussing the follow up from the site visit and then the topic of the Operational Plan came up.

The status of the Operational Plan for Clean Harbors is that it has been submitted and comments have been sent back to the company. The company would like to get the plan approved because it is one of the non-compliance issues that shows up every year in their audit. I told Eric that you were no longer working on the Hazardous Waste files and that I wasn't sure what my continuing involvement would be with the approval process.

I know that getting the Operational Plans approved is a time consuming project with the back and forth discussions of aspects of the plan. I told Eric that I would look into what is happening before the company invests a lot of time in looking at the suggestions that were just sent to them. In my experience, nothing makes a client more unhappy than investing time and money into something and having no response!

Could you look into the strategy for dealing with Operational Plans approvals while you're away? Then if you want I can pass the information back to Eric.

Thanks and have a good weekend!

Christine Armour, RPF
Compliance and Enforcement Forester
Squamish Field Unit
Ministry of Forests, Lands and Natural Resource Operations
phone: (604) 898-2112

Enick, Oana V ENV:EX

From: Armour, Christine A FLNR:EX
Sent: Friday, July 22, 2011 3:48 PM
To: 'flanagan.william@cleanharbors.com'
Cc: Enick, Oana V ENV:EX
Subject: May 6th inspection of the Delta, BC facility
Attachments: Inspection Report.pdf; Base of New Mixing Area.JPG; New Mixing Area.JPG; PCB Storage.JPG; Receiving Dock.JPG; Tank Farm.JPG; May 6th, 2011 Inspection Follow-up Letter.docx

Hi Eric,

Apologies for the delays – the signed letter is being sent out to Wayne from Oana Enick.

I'm attaching a copy for you and a copy of the inspection form from May 6th, 2011. Normally, just a letter with the findings is sent out but we had talked about getting a copy of the actual inspection to you because you're getting to know BC legislation and the facilities.

Also attached are some photos from the site visit, any questions give me a call.

Christine

Christine Armour, RPF
Compliance and Enforcement Forester
Squamish Field Unit
Ministry of Forests, Lands and Natural Resource Operations
phone: (604) 898-2112

Enick, Oana V ENV:EX

From: Armour, Christine A FLNR:EX
Sent: Thursday, July 7, 2011 10:47 AM
To: Enick, Oana V ENV:EX
Subject: RE: Clean Harbors site inspection

Hi there,

I think this is the more formal follow-up letter to go with the inspection – I couldn't quite remember the exact signage issue – it was to do with adding some hazard signs to the groups of stored wastes in the loading dock and warehouse?

Here is the letter – with the 3 issues identified – in the past it looks like it was sent out under Stephanie's name so I updated the info to Cassandra but not sure if this is the current procedure!

Thanks for your help in getting this finished – been on my desk way too long.



Inspection
Follow-up.docx

Christine Armour, RPF
Compliance and Enforcement Forester
South Coast Region
Ministry of Forests, Lands and Natural Resource Operations
Squamish Forest District
phone: (604) 898-2112

From: Enick, Oana V ENV:EX
Sent: Thursday, July 7, 2011 7:24 AM
To: Armour, Christine A FLNR:EX
Subject: RE: Clean Harbors site inspection

Hi Christine:

This looks fine. We usually give out a typed report outlining the issues noticed during the inspection. However, if the client requests a copy of the 'raw' inspection form, which I understand Clean Harbors did, they are certainly entitled to it. Go ahead and forward it to them. Have you also clarified with them in an e-mail the three issues: signs (minor), gate security (relatively minor) and berm integrity (major)? If not, perhaps you could mention these in the e-mail? Thanks, Oana.

Oana Enick, P.Ag., M.E.T.
Environmental Protection Officer
Environmental Management
Ministry of Environment
Lower Mainland Region
ph: (604) 582-5270 fax: (604) 584-9751

From: Armour, Christine A FLNR:EX
Sent: Wednesday, July 6, 2011 4:27 PM
To: Enick, Oana V ENV:EX
Subject: Clean Harbors site inspection

Hi Oana,

Finally had an afternoon to review the records that Wayne sent to finish off the inspection report – everything seemed complete and in order.

The new regional manager wanted to receive a copy of the inspection so I wanted to make sure everything is complete before sending it off.

I'm attaching the report and my photos – when you have a chance could you take a look – just to make sure it's complete! All the info is saved on the haz waste folder – but seemed easier to attach than give you a file location.

Hope you're enjoying the sunshine – I'm in Squamish all week -

s.22

s.22

<< File: Base of New Mixing Area.JPG >> << File: New Mixing Area.JPG >> << File: PCB Storage.JPG >> << File: Receiving Dock.JPG >> << File: Tank Farm.JPG >> << File: Inspection Report.pdf >>

Christine Armour, RPF
Compliance and Enforcement Forester
South Coast Region
Ministry of Forests, Lands and Natural Resource Operations
Squamish Forest District
phone: (604) 898-2112



Date: July 7, 2011

File: RS-08388

Clean Harbors Environmental Services
7842 Progress Way
Delta, British Columbia
V4G 1A4

Attention: Wayne Ma

Dear Sir:

Re: Site Inspection of Clean Harbors Environmental Services
Located at: 7842 Progress Way, Delta, British Columbia

This letter is in follow up to the site inspection conducted by Ministry of Environment (Ministry) staff on May 6, 2011 at the Clean Harbors Environmental Services facility located at 7842 Progress Way, Delta, British Columbia. This letter shall not be construed as a waiver of any lawful requirement pertaining to the unauthorized discharge of waste to the environment, and is without prejudice to any further legal action that the Ministry may take under the *Environmental Management Act (Act)*.

The June 30, 2009 site inspection was completed as part of routine Ministry operations in the Lower Mainland region. This inspection was based on the *Hazardous Waste Regulation (HWR)*, but does not represent a comprehensive inspection. Although this inspection was limited to various sections of the *HWR*, please be advised that all requirements of the *Environmental Management Act (the Act)* and the *HWR* must be complied with at all times. Failure to comply is a violation of the *Act* and may be subject to legal action.

For your reference, the *Act* and the *HWR* can be found at the following websites, respectively:
http://www.qp.gov.bc.ca/statreg/stat/E/03053_00.htm
http://www.qp.gov.bc.ca/statreg/reg/E/EnvMgmt/EnvMgmt63_88/63_88.htm

Results of the inspection conducted on May 6, 2011 indicate that the facility located at 7842 Progress Way, Delta, British Columbia, is not in compliance with sections of the *HWR* specified in the table below.

Priority	HWR	Inspection Finding
Minor	Section 5: Waste Information	Discussed increasing signage in loading and storing areas to identify groups of wastes and their hazards.
Minor	Section 8: Access Security	Side Gate was open.
Major	Section 10: Spill Protection and Reporting	Berms for the lugger pad and tank farm have been worn down and appear to be compromised.

Please respond in writing to the Ministry within 30 days of the date of this letter, identifying actions to rectify these issues of non-compliance. Please include a schedule for implementing these actions.

The Ministry looks forward to working with you to bring your facility into full and continuous compliance with the *HWR*. If you have any questions, or wish to discuss this matter further, please contact Oana Enick at (604) 582-5332 or via e-mail at Oana.Enick@gov.bc.ca.

Sincerely,

Cassandra Caunce.
Section Head, Env Mgmt, Business and Standards
Environmental Protection Section
Ministry of Environment, Lower Mainland Region



FILE

COPY

Date: July 7, 2011

File: RS-08388

Clean Harbors Environmental Services
7842 Progress Way
Delta, British Columbia
V4G 1A4

Attention: Wayne Ma and Eric Flanagan

Dear Sirs:

**Re: Site Inspection of Clean Harbors Environmental Services
Located at: 7842 Progress Way, Delta, British Columbia**

This letter is in follow up to the site inspection conducted by Ministry of Environment (Ministry) staff on May 6, 2011 at the Clean Harbors Environmental Services facility located at 7842 Progress Way, Delta, British Columbia. This letter shall not be construed as a waiver of any lawful requirement pertaining to the unauthorized discharge of waste to the environment, and is without prejudice to any further legal action that the Ministry may take under the *Environmental Management Act (Act)*.

The June 30, 2009 site inspection was completed as part of routine Ministry operations in the Lower Mainland region. This inspection was based on the *Hazardous Waste Regulation (HWR)*, but does not represent a comprehensive inspection. Although this inspection was limited to various sections of the *HWR*, please be advised that all requirements of the *Environmental Management Act (the Act)* and the *HWR* must be complied with at all times. Failure to comply is a violation of the *Act* and may be subject to legal action.

Ministry of Environment

Regional Operations
Lower Mainland Region

Mailing/Location Address:
10470 152 Street
SURREY BC V3R 0Y3

Telephone: (604) 582-5200
Facsimile: (604) 930-7119
<http://www.gov.bc.ca/>
<http://www.gov.bc.ca/wlap/>

For your reference, the *Act* and the *HWR* can be found at the following websites, respectively:
http://www.qp.gov.bc.ca/statreg/stat/E/03053_00.htm
http://www.qp.gov.bc.ca/statreg/reg/E/EnvMgmt/EnvMgmt63_88/63_88.htm

Results of the inspection conducted on May 6, 2011 indicate that the facility located at 7842 Progress Way, Delta, British Columbia, may not be in compliance with sections of the *HWR* specified in the table below.

HWR	Inspection Finding
Section 5: Waste Information	Discussed increasing signage in loading and storing areas to identify groups of wastes and their hazards.
Section 8: Access Security	Side Gate was open.
Section 10: Spill Protection and Reporting	Berms for the lugger pad and tank farm have been worn down and appear to be compromised.

Please respond in writing to the Ministry within 30 days of the date of this letter, identifying actions to rectify these issues of non-compliance. Please include a schedule for implementing these actions.

The Ministry looks forward to working with you to bring your facility into full and continuous compliance with the *HWR*. If you have any questions, or wish to discuss this matter further, please contact Oana Enick at (604) 582-5332 or via e-mail at Oana.Enick@gov.bc.ca.

Sincerely,



Oana Enick
Environmental Protection Officer
Environmental Protection Section
Ministry of Environment, Lower Mainland Region

Enick, Oana V ENV:EX

From: Armour, Christine A FLNR:EX
Sent: Wednesday, July 6, 2011 4:27 PM
To: Enick, Oana V ENV:EX
Subject: Clean Harbors site inspection

Hi Oana,

Finally had an afternoon to review the records that Wayne sent to finish off the inspection report – everything seemed complete and in order.

The new regional manager wanted to receive a copy of the inspection so I wanted to make sure everything is complete before sending it off.

I'm attaching the report and my photos – when you have a chance could you take a look – just to make sure it's complete! All the info is saved on the haz waste folder – but seemed easier to attach than give you a file location.

Hope you're enjoying the sunshine – I'm in Squamish all week –

s.22

s.22



Base of New
Mixing Area.JPG



New Mixing
Area.JPG



PCB Storage.JPG



Receiving
Dock.JPG



Tank Farm.JPG



Inspection
Report.pdf

Christine Armour, RPF
Compliance and Enforcement Forester
South Coast Region
Ministry of Forests, Lands and Natural Resource Operations
Squamish Forest District
phone: (604) 898-2112



Ministry of Environment
Environmental Protection

HAZARDOUS WASTE FACILITY INSPECTION REPORT

Date of Inspection: May 6/2011
Inspection Conducted By: Dana Enick / Christine Armour
File: RS-08388

Company Name Clean Harbours

Address: 7842 Progress Way

Contact Name: Wayne Ma

Job Title: Facility General Manager

INSPECTION REASON

☒ Compliance Audit
☐ Random

☐ Complaint driven
☐ Other (specify)

TYPE OF INSPECTION

☒ Pre-arranged
☐ Sample Collection
☐ Inspection of Discharge / Storage

☐ Unannounced
☐ Meeting

COMMENTS BASED ON

☒ Visual observations

☒ Data review

☒ Discussion with Wayne Ma

INDEPENDENT SAMPLES TAKEN ☐ Yes

☒ No

PHOTOS TAKEN ☒ Yes

☐ No

SITE RECORDS TAKEN ☐ Yes

☒ No * copies sent by email of requested records.

ADDENDUM REQUIRED

☐ Division 4 – Incinerators & Thermal Facilities

☐ Division 5 – Mobile Facilities

☐ Division 7 – Waste Piles, Impoundments & Land treatment Facilities



Mailing Address
42000 Loggers Lane
Squamish, B.C.
V8B 0H3

Ministry of Forests,
Lands & Natural
Resource Operations

SOUTH COAST REGION

Telephone: (604) 898-2112
Facsimile: (604) 898-2191
e-mail: Christine.Armour@gov.bc.ca

Dana Enick
Environmental Protection Officer,
Environmental Protection Division
Phone 604 582 5 ____

The ministry arrived at the facility at approximately 10:00 am/pm and departed at approximately 12:00 am/pm on May 6, 2011.

Site Observations

The following table lists hazardous wastes stored at the site during the inspection:

Waste Name	TDG Class & UN Number (if applicable)	Physical State	Estimated Quantity Found Onsite	Source of Waste (industry or process)
<i>see inventory.</i>				

The referenced hazardous waste facility was inspected in terms of the Hazardous Waste Regulation. This inspection assesses compliance of the facility on the date of the inspection. Following are the results of the inspection based on each applicable section of the Hazardous Waste Regulation

Section 3 – Siting Standards

Purpose: Ensures that the site is located in an approved area.

Results: 1. Copy of letter attesting to compliance with siting standards See file OLC.

Is the facility constructed to the requirements of the siting standards? ☐ Yes ☐ No ☐ Unknown

[Assume that siting standards have been met if plans and specifications have been approved unless available information indicates otherwise]

Comments: Site is an old contaminated site, there are records indicating that the site needs to be cleaned up.

Date:

File:

Section 4 – Plans

Purpose: Development and operational plans provide the basis for ministry approval for this facility.

Results: 1. Have these plans been submitted to the ministry? Yes.
Do the plans include all of the waste currently stored on your facility? _____
2. Do you have approval letters from the ministry? _____
3. Copy of HWR Plans and Specifications Guideline provided to client? _____

Submit update contingency. - done updated plan on file

Are the plans and specifications of new works approved? ☐ Yes ☐ No ☐ Unknown
(Last updated/ Submitted date: submitted.)

Are the plans for the modification of existing works approved? ☐ Yes ☐ No ☐ N/A
(Last updated/ Submitted date: _____)

Is the operational plan approved? ☐ Yes ☐ No ☐ Unknown
(Last updated/ Submitted date: _____)

Are all hazardous wastes currently onsite listed on the operational plan or permit? ☒ Yes ☐ No ☐ N/A
If no, provide information below

Waste Name	TDG Class and UN Number (if applicable)	Physical State	Estimated Quantity

Comments: O.K.

Section 5 – Waste Information

Purpose: Ensure that the facility is aware of any and all types of wastes (and potential hazards) coming in.

Results: 1. How do you identify the type of waste that you receive?
☒ oral/written communication with waste generators + profile, MSDS.
☒ sensory evaluation on site
☒ laboratory testing (lab reports) random or sufficient cause
2. Log books and/or copies of lab reports costed for logs.
3. Log books of volume/weight of waste coming in _____

Date:

Are the following requirements in compliance?

☒ Yes ☐ No ☐ Unknown

[If no, mark x in appropriate box]

(1) No owner of a facility shall accept, handle, store, treat, destroy or dispose of hazardous waste at the facility or allow it to be accepted, handled, stored, treated, destroyed or disposed of at the facility without taking reasonable measures to identify all hazards associated with the hazardous waste through

(a) physical, chemical or biological analyses,

(b) published scientific documentation,

(c) consultation with the waste generator, or

(d) consultation with the manufacturer in the case of manufactured goods which become waste

and without limiting the generality of this, the owner shall again inquire into and ascertain those hazards wherever he has reason to believe that

(e) a process or operation generating a hazardous waste delivered to the facility has changed, or

(f) the description of a hazardous waste received at the facility does not match the description of the hazardous waste on the accompanying waste manifest.

(2) The owner of a facility shall not accept a hazardous waste that

(a) does not match the description on the accompanying manifest, or

(b) is not accompanied by a manifest,

and where any person attempts to deliver such waste to the facility, the owner of the facility shall immediately notify the director by telephone to seek

(c) authorization to accept the hazardous waste, or

(d) other instructions.

(3) No person shall accept, at any hazardous waste facility, hazardous waste which is described as a quantity more than 100 kg or 100 l on the accompanying manifest without first determining the quantity of waste delivered by measuring the weight or volume of the shipment.

(4) Where the quantity of hazardous waste received at a hazardous waste facility is either

(a) 5% greater than, or

(b) 5% less than

the quantity described on the manifest, the owner of the facility shall immediately notify the director by telephone to seek

(c) authorization to accept the hazardous waste, or

(d) other instructions.

Comments: Signs have been upgraded around facility for warnings of hazards.

Section 6 – Waste Record

Purpose: A waste record ensures that you know at any given time exactly what, how much and where you store the products you are handling. In case of emergencies, it enables safe and rapid response.

Results: 1. Copy of balance of waste currently on site inventory requested.
2. Map (detailed) of the site showing various storage areas requested.

Note: Company policy to move C/S within 30 days.

Date:

File:

Are the records available during inspection?

☒ Yes ☐ No ☐ Unknown

Are the records correct, without apparent deficiencies?

☒ Yes ☐ No ☐ Unknown

[If no, mark x in appropriate box]

(1) The owner of a hazardous waste facility shall keep for inspection by an officer an operating record at his facility and shall record in a written or retrievable electronic form the following information for each hazardous waste received, stored or shipped:

(a) the description including

(i) the name and identification number as described in the federal dangerous goods regulations, and

(ii) the physical state (i.e. whether it is solid, liquid, gaseous or a combination of one or more of these);

(b) the quantity in kilograms or litres;

(c) the method and date of storing, repacking, treating or disposing at the facility, cross-referenced to specific manifest document numbers applicable to the hazardous waste;

(d) the location of each hazardous waste within the facility and the quantity at each location.

(2) The owner of a hazardous waste facility shall keep the records required under subsection (1) for a minimum of 2 years after the waste has been removed from the facility.

Comments: Clean Harbors has a tracking system for all waste on site and a copy of the inventory was provided. A storage map was also provided.

Section 7 – Weather Protection

Purpose: Ensures that any weather events will not cause or contribute to contamination of the environment with HW. Also ensures that weather events will not cause cross contamination of non-compatible wastes.

Results: Suggestions to the client? OK.

Is the facility designed, constructed and maintained so that elements of the weather such as precipitation, heat, frost, wind and humidity have no detrimental effect on the capability of the facility to manage hazardous waste.

☐ Yes ☐ No ☒ Unknown

Comments: _____

Date:

Section 8 - Access Security

Purpose: Ensures that the site is secured at all times. It protects the public from un-authorized entry of HW into the environment. It protects against intentional or unintentional trespassing and it also protects the company (you) from any un-authorized dumping.

Results: Do you use:

- a) 24-hours surveillance _____
- ☒ b) Fencing (2.13 m high and barbed wire) _____
- ☒ c) Locks on gates _____
- ☒ d) Lock on valves and pumps _____
- ☒ e) DANGER signs _____
- f) Other _____

Does the facility meet access security requirements?

☒ Yes ☐ No ☐ Unknown

[If no, mark x in appropriate box]

No person shall operate a hazardous waste facility unless access to the facility by unauthorized persons or by animals is prevented by

- (a) a 24 hour surveillance system that continuously monitors and controls entry to the facility, and for this purpose television monitors or an approved system, or surveillance guards present at the facility shall be used, ☐
- (b) a barrier such as ☐
 - (i) a 2.13 m high chain link fence topped with 3 strands of barbed wire to prevent scaling of the fence, or equally effective approved barrier, and
 - (ii) a means of controlled entry, at all times, through gates or other entrances,
- (c) locks or locked covers on all valves, pumps, electrical controls and other operational controls which would be accessible if the prevention measures referred to in paragraph (a) or (b) above were breached, and ☐
- (d) a sign, legible from a distance of at least 10 m, reading ☐
 - (i) "DANGER - UNAUTHORIZED PERSONNEL KEEP OUT",
 - (ii) "DANGER - AUTHORIZED PERSONNEL ONLY", or
 - (iii) "RESTRICTED AREA - AUTHORIZED PERSONNEL ONLY",or equivalent wording, posted at each entrance to the facility and at such other locations as a director may fix.

Comments: Please ensure all gates are closed/locked

Section 9 - Prevention of Fire, Explosion and Accidental Reactions

Purpose: To prevent thermal accidents and to ensure appropriate response resources in accidents do occur.

Results: Do you have:

- ☒ a) signs warning DANGER – NO OPEN FLAMES, SMOKING OR SPARKS _____
- ☒ b) 24-hr. fire alarm system with a) smoke alarms, b) heat sensing alarms _____
- ☒ c) aisle space between containers to allow movement of people and equipment _____

Date:

File:
MOE-2013-00098
Page 28

Does facility meet requirements?

☒ Yes ☐ No ☐ Unknown

[If no, mark x in appropriate box]

(1) The owner of a hazardous waste facility shall prevent the accidental ignition or reaction of ignitable or reactive waste by protecting such waste from sources of ignition or reaction such as open flames, smoking, grinding and welding, hot surfaces, frictional heat, static, electrical or mechanical sparks, spontaneous ignition from heat producing chemical reactions and radiant heat by means of;

- (a) electrical spark grounding where the potential for static buildup exists ☐
- (b) suitable separation distances or a barrier with a minimum fire rating of 2 hours between the waste and ignition sources, and ☐
- (c) a warning sign, legible from a distance of 10 m, reading "DANGER - IGNITABLE/REACTIVE HAZARDOUS WASTE, NO OPEN FLAMES, SMOKING OR SPARKS". ☐

(2) The owner of any indoor hazardous waste facility which manages reactive or ignitable hazardous waste shall

- (a) provide and maintain a continuous 24 hour fire alarm system with ☐
 - (i) smoke sensing alarms, and
 - (ii) heat sensing alarms, capable of automatically stopping any forced air ventilation systems in the facility and summoning a 24 hour external emergency response through
 - (iii) a local fire department,
 - (iv) a local response team, or
 - (v) on site security staff who have immediate communication access to a local response agency,
- (b) provide and maintain a fire suppression system specified by the Fire Commissioner or a local assistant to the Fire Commissioner as defined in the Fire Services Act, or where not so specified, provide and maintain ☐
 - (i) a permanent, automatic system which uses foam, inert gas or dry chemical, or
 - (ii) one portable ABC rated fire extinguisher with a minimum 10 kg capacity for every 250 m² of the facility's space,
- (c) provide and maintain sufficient aisle space between containers of hazardous waste to allow the unobstructed movement of persons, fire protection equipment, spill control equipment and decontamination equipment to any part of the facility, ☐
- (d) design and construct the facility so that the walls, doors and floor are noncombustible with a minimum fire rating of 2 hours, and ☐
- (e) ensure that any heat required for the facility is provided only by indirect means such as hot water, steam or electrical resistance and not by any device which uses an open flame within 10 m of where wastes are located, nor by any other device prohibited by the Fire Commissioner or a local assistant to the Fire Commissioner under the Fire Services Act ☐

(3) The owner of a hazardous waste facility that treats, stores or disposes of ignitable or reactive waste shall take precautions to prevent reactions, which may do any of the following:

- (a) generate extreme heat or pressure, fire or explosions, ☐
- (b) produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment; ☐
- (c) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion; ☐
- (d) damage the structural integrity of the facility. ☐

Comments: _____

OK

Date: _____

Section 10 - Spill Protection and Reporting

Purpose: To prevent against and protect from contamination of the surrounding area in the event of leaks from the storage containers/tanks.

Results: 1. Copies of approvals for the containment system on plans & specs.
2. Do the tanks have high-level alarms?
3. Logs of the regular (weekly - section 10.b) inspection to assess design integrity copy requested

The owner of a hazardous waste facility shall

(a) provide and maintain an approved spill containment system to contain on site any release of spilled hazardous waste,

Is the spill containment system approved?

☐ Yes ☐ No ☐ Unknown

(Last updated/ Submitted date:)

Does the company have the monthly inspection records available?

☐ Yes ☐ No ☐ Unknown

Are the following requirements met?

☐ Yes ☐ No ☐ Unknown

- (b) inspect the facility monthly ☐ and, where any free liquid hazardous waste is stored at the facility,
- (i) provide and maintain a 24 hour spill alarm system appropriate for the hazardous waste managed at the facility, or ☐
- (ii) inspect the facility weekly for any irregularities such as malfunctions, deterioration, operator error, leaks or spills which may lead to the escape of hazardous waste from the facility or may pose a threat to human health, ☐
- (c) maintain at the facility a record of inspections conducted as required by paragraph (b) showing, ☐
- (i) any irregularities in the facility,
- (ii) dates that any such irregularities were discovered,
- (iii) corrective action taken, and
- (iv) date of corrective action, and ☐
- (d) immediately report any irregularities to the director. ☐

Comments: Berms are compromised, please
inspect ~~log~~ lugger pad & tank farm.
weekly facility inspection records submitted for past month.

Section 11 - Contingency Plan

Purpose: It allows the company to enact rapid and effective measures to contain and manage a spill emergency at the site. It is also a requirement for regulatory approval.

Results: 1) Have you submitted a plan? Yes Date? 2008, but will update
2) Copy of the plan approval letter?

Is the Contingency Plan Approved?

☐ Yes ☒ No ☐ Unknown

Date:

not yet File:

Comments: _____

Section 12 - Emergency Systems Testing

Purpose: To ensure that the emergency systems and plans remain operational at all times.

Results: 1. Do you have copies of inspection logs for:
✓ a) the fire systems (from 9(2)) _____
✓ b) the spill protection systems (from 10(a and b)) Requested copies.
- c) the contingency plan annual drills Requested copies.

Are the following requirements met?

☐ Yes ☐ No ☐ Unknown

(1) The owner of a hazardous waste facility shall test or inspect

- (a) the fire and explosion protection systems described in section 9(2),
- (b) the spill protection systems described in section 10(a) and (b), and
- (c) the contingency plan described in section 11(a),

at least once a year to ensure that such protective measures, systems, procedures, equipment and clothing are capable of proper operation in an emergency.

☐
☐
☐

(2) The owner of a hazardous waste facility shall make a written record of each test carried out as required by subsection

(1)

and shall include in the record

- (a) the measures, systems, procedures, equipment and clothing tested,
- (b) a description of the test methods,
- (c) the date of the tests on each component,
- (d) the results of the tests, and
- (e) description and date of any corrective action and
- (f) the record shall be available for inspection by an officer.

☐
☐
☐
☐
☐
☐

(3) Where a facility manages more than 20 tonnes of hazardous waste in a calendar year, the owner of the facility shall submit a copy of the record referred to in subsection (2) to the director within 90 days after each test. (Last submitted date: _____)

☐

Comments: Received copies of the "Delta Facility Annual Contingency Plan Exercise and Spill Response Training"

Received copies of "processing area weekly inspection" and "weekly facility inspection reports" -> covers logs of spill protection systems.

Date:

Section 13 - Personnel Training

Purpose: To ensure that personnel handling the waste are appropriately trained. It protects the employees, the public and the company.

Results: Copy of 2 employee's training records (excludes office employees) requested copy.

Are the personnel training records available?

☐ Yes ☐ No ☐ Unknown

Are the following requirements met?

☐ Yes ☐ No ☐ Unknown

(1) The owner of a hazardous waste facility shall ensure that every person employed in the operation of the facility receives training which includes instruction on ☐

- (a) the employed person's duties and responsibilities,
- (b) use of personnel protective equipment,
- (c) fire and explosion response procedures,
- (d) spill response procedures,
- (e) communications and alarm systems,
- (f) use of abatement and cleanup equipment,
- (g) shut down operations, and
- (h) hazards of all hazardous waste managed at the facility, before beginning employment in an operational capacity.

(2) The owner of any facility shall provide to each operational staff member an annual review of the training required by subsection (1). ☐

(3) An owner of a facility referred to in subsection (1) shall maintain and shall produce for inspection whenever required by an officer a record of ☐

- (a) all persons employed in the operations of the facility and their duties and responsibilities,
- (b) a description of the level of training received by each person so employed, and
- (c) the date of the last training session for each person so employed.

Comments: Received - all in order - records for: Arlen N. Fennings,
Jaswant Toor,

Section 14 - Closure Plan

Purpose: To ensure safe closing and decommissioning procedures for the site.

Results: 1) Have you submitted a plan to the ministry? Yes.
2) Copy of the approval letter? No

Date:

Is the Closure Plan Approved?

☐ Yes ☐ No ☐ Unknown

Section 16 - Short Term Storage Facilities (Operational Requirements)

Purpose: To ensure that the site is operated in a manner consistent with easy and effective containment and management of waste in the event of leaks and/or spills.

Results: ✓ 1) Adequate space between containers to allow inspections? _____
2) Containment system (110% of volume) on plans & specs
3) Overflow protection (fixed piping, high level alarms) _____

Are the following requirements met?

☐ Yes ☐ No ☐ Unknown

The owner of a short term storage facility where free liquid hazardous waste is stored in containers or tanks shall:

- (a) provide space to allow for manual, visual inspection for leaks, ☐
- (b) provide and maintain an impervious containment system sufficient to hold the larger of ☐
 - (i) 110% of the largest volume of free liquid hazardous waste in any given container / tank, or
 - (ii) 25% of the total volume of free liquid hazardous waste in storage,
- (c) provide controlled forced air ventilation to any indoor facility so that 0.3 m³/min/m² of a facility is exhausted at all times unless a facility is used solely for passive storage, ☐
- (d) provide overflow protection for tanks by means of ☐
 - (i) fixed piping to an empty adjacent tank with a capacity equal to or greater than 20% of the protected tank,
 - (ii) a high level alarm set at 90% of the full liquid level of the tank, or
 - (iii) an automatic feed cutoff system set at 95% of the full liquid level of the tank container
- (e) use dripless hose connections when transferring liquid hazardous waste by means of detachable hoses or pipes, ☐
- (f) ensure that all materials on pipes, pumps, containers and any other equipment which comes in contact with the hazardous waste is compatible with the hazardous waste, and ☐
- (g) ensure that all hazardous waste transfer lines, hoses and pipes are equipped with automatic shutoff or close on failure valves which close off the flow of hazardous waste in the event of a sudden accidental escape unless a method of containment is provided to prevent the release of free liquid hazardous waste. ☐

Comments: _____

Section 17 - Performance Standards

Purpose: To ensure that any emissions or discharges to the environment (or storm or sanitary sewers) meet safety standards.

Results: Copies of laboratory reports showing that effluent quality is within the triggers for Schedule 1.2
do discharge to storm. 2 X / month
discussed toxicity.

Date:

Are the following requirements met?

☐ Yes ☐ No ☐ Unknown

[mark x where there are deficiencies]

The owner of a short term storage facility shall ensure that

(a) any emissions to the atmosphere resulting from the operation of the short term storage facility are controlled to meet approved emission specifications, and ☐

(b) any discharge of liquid effluent to the environment, to storm sewers or to a municipal or industrial effluent treatment works which results from the operation of the short term storage facility meets the effluent criteria prescribed in Schedule 1.2 ☐

Comments: _____

Section 17.1 - Additional Requirements for Short Term Storage of PCB Wastes

Purpose: PCB – polychlorinated byphenols are chemicals which require special treatment under the HWR. These can be pure, liquid, solid and/or mixed in oils, paint or soil or incorporated into other solids.

Results: 1. Do you store or handle PCB wastes? Yes
2. Containers must be stored on pallets Yes stacked no more than 2 drums high _____
3. Copy of inventory and location None on site today

Are PCB wastes stored at the facility?

☐ Yes ☐ No ☐ Unknown

Are the requirements of Section 17.1 met if the above box is yes?

☐ Yes ☐ No ☐ Unknown

[mark x where there are deficiencies]

(1) Notwithstanding section 2 (3) to (6) and (8), all short term storage facilities where ☐

(a) 1.0 kilogram or more of PCBs, _____

(b) 100 litres or more of PCB liquid, or _____

(c) 100 kilograms or more of PCB solids _____

are stored shall comply with sections 3 to 14, 16, 17 and this section on and after February 1, 1989.

(2) For the purpose of determining the quantity, volume or weight by which PCBs, PCB liquids or PCB solids exceed the amount specified in subsection (1), the total amounts stored at each location owned or controlled by the same owner or operator shall be added together. ☐

(3) The owner of a short term storage facility used to store PCB wastes shall ensure that

(a) drums up to 205 litre capacity used for PCB solids ☐

(i) Repealed. [B.C. Reg. 132/92, s. 12 (a).]

(ii) are made of 18 gauge steel or heavier,

(iii) have a securely attached, close fitting removable steel lid and a gasket of PCB resistant material, and

(iv) are painted to prevent rusting,

(b) drums up to 205 litre capacity used for PCB liquids ☐

(i) Repealed. [B.C. Reg. 132/92, s. 12 (b).]

(ii) are made of 16 gauge steel for PCB liquids placed in storage or repackaged on or after April 1, 1992 and 18 gauge steel for PCB liquids placed in storage before April 1, 1992,

Date:

- (iii) are closed except for screw plug double bung access holes, and
- (iv) are painted to prevent rusting,
- (c) all containers used for PCB wastes, and all PCB equipment except transformers on skids, shall be placed on pallets or an alternate system of storage that allows for visual inspection for leaks and easy removal of the waste, ☐
- (d) drums of PCB wastes shall not be stacked more than 2 drums high, ☐
- (e) containers of PCB wastes other than drums are not stacked unless the containers have been specifically designed for stacking and in such case that they are not stacked more than 2 containers high, ☐
- (f) an up-to-date inventory and site map indicating where all PCBs are stored at the facility and a fire safety plan acceptable to the local assistant to the fire commissioner ☐
 - (i) are provided to the director,
 - (ii) are provided to the local assistant to the fire commissioner, and
 - (iii) are kept on site for inspection by an officer,
- (g) capacitors containing 0.5 kilogram or more of chlorobiphenyls are labeled with either Environment Canada's serialized, black and white "CAUTION/ATTENTION PCB" label, measuring 76 mm by 76 mm, or a reasonable alternative, unless the capacitor was stored in a container before this section came into effect, ☐
- (h) electrical transformers, electromagnets and other equipment containing chlorobiphenyls in a concentration exceeding 1% by weight are labeled with either Environment Canada's serialized, black and white "ATTENTION PCB" label, measuring 150 mm by 150 mm, or a reasonable alternative, ☐
- (i) electrical transformers, electromagnets and other equipment containing chlorobiphenyls in a concentration exceeding 50 parts per million by weight but not greater than 1% by weight are labeled with either Environment Canada's "ATTENTION-Contaminated with PCBs" label, or a reasonable alternative, ☐
 - (i 1.) containers containing chlorobiphenyls in a concentration exceeding 1% by weight are labeled with either Environment Canada's "ATTENTION - PCB Waste" label, or a reasonable alternative, ☐
- (j) the floor or other surface of the storage site on which undrained PCB equipment or PCB liquids are stored, whether indoors or outdoors, shall be constructed of steel, concrete or other durable material, ☐
- (k) where undrained PCB equipment or PCB liquids are stored on a floor or other surface of the storage site, whether indoors or outdoors, the floor or surface of the site shall be provided with curbing or sides sufficient to contain ☐
 - (i) in the case where a single item is being stored, 125% of the volume of the PCB liquid in the item, and
 - (ii) in the case where more than one item is being stored, the greater of twice the volume in the largest item or 25% of the volume of all the PCB liquids stored on the floor or surface,
- (l) where the material of the floor or other surface of the storage site or the curbing or sides referred to in paragraph (k) are capable of absorbing PCBs, they are sealed with a durable PCB resistant coating, ☐
- (m) where undrained PCB equipment or PCB liquids are stored on a floor or other surface of the storage site, any existing floor drains, sumps or other openings in the floor are closed and sealed to prevent the escape of liquid, ☐
- (n) doors to storage sites, fencing and other security barriers enclosing storage sites are labeled with Environment Canada's non-serialized, black and white "ATTENTION PCB" label, measuring 150 mm by 150 mm, or a reasonable alternative. ☐

Comments: _____

Date:

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Division 3 — Requirements For Treatment Facilities

Section 18 - Operational requirements

Purpose: Demonstration trials are performed in order to ensure that the treatment applied to a waste stream is effective.

Results:

1. Did you conduct a demonstration trial for each treatment? Yes.
2. Do you have an approval letter for each demonstration trial? Yes hydrocarb. solid.
3. Did you submit the trial results to the ministry prior to full-scale treatment? yes metals stab

Are the following requirement met? ☐ Yes ☐ No ☐ Unknown
[mark x where there are deficiencies]

(1) The owner of a treatment facility shall provide an automatic means of stopping

(a) the process equipment, and ☐

(b) the waste feed system ☐

in the event of an accidental release or in circumstances which might lead to an accidental release of hazardous waste.

Does the company have an approved demonstration trial? ☐ Yes ☐ No ☐ Unknown

Did the company submit the demonstration trial results prior to full-scale treatment?
☐ Yes ☐ No ☐ Unknown

Comments: _____

Section 19 - Performance standards

Purpose: To ensure treatment remains effective at all times

Results:

1. Log and copies of laboratory results showing effluent is in compliance with schedule 1.2 have been submitted
2. Do you have permits? No GVRD, No Municipality
No effluent

Are the following requirements met? ☐ Yes ☐ No ☐ Unknown
[mark x where there are deficiencies]

(1) The owner of a treatment facility shall ensure that

(a) any discharge of liquid effluent to the environment, to storm sewers or to a municipal or industrial effluent treatment works which results from the operation of the treatment facility meets the effluent criteria prescribed in Schedule 1.2, and ☐

(b) any emissions to the atmosphere resulting from ☐

(i) a treatment facility process, or
(ii) the ventilation system of a treatment facility,
meet approved emission specifications.

Date:

Is the following requirement met?

☐ Yes ☐ No ☐ Unknown

[mark x where there are deficiencies]

(2) The owner of a treatment facility shall not allow residue to be discharged from the treatment facility unless

(a) the residue is managed at a hazardous waste management facility in accordance with this regulation, or ☐

(b) the owner demonstrates to the satisfaction of a director in accordance with test protocols or methods approved by a director under section 53 (1) that the residue no longer poses a hazard to human health or to the environment and that the residue is suitable for ☐

(i) disposal to a landfill authorized by a permit, approval, order or waste management plan, or

(ii) some other purpose under an approved management option.

(3) Where an owner has demonstrated to a director in accordance with subsection (2) that a residue no longer poses a hazard to human health or to the environment, the director may, notwithstanding section 39, authorize disposal of the residue to a landfill other than a secure landfill. ☐

Comments: _____

Part 6 - Management of Specific Hazardous Wastes

Section 41 - Waste oil

N/A

Purpose: Ensures the quality of the oil meets the requirements for the purpose for which you use it.

Results: 1. Copy of laboratory results used to ensure that the waste oil meets guidelines _____

Are the following requirements met?

☐ Yes ☐ No ☐ Unknown

[mark x where there are deficiencies]

(1) Subject to this section, waste oil may be disposed of

(a) in the manufacture of pavement, and ☐

(b) by combustion as a fuel. ☐

(2) No person shall without approval mix waste oil with any material in the manufacture of pavement unless the waste oil meets the following specifications ☐

(5) No person shall, without approval, use waste oil as a fuel unless it meets the following specifications: ☐

Date:

File:
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Page 37

Waste Oil Specifications for Use as a Fuel

COLUMN I	COLUMN II	COLUMN III
Parameter	Allowable Level for Fuel in a Cement Kiln	Allowable Level for Fuel in Uses Other Than for Cement Kilns
total arsenic	20 mg/L maximum	5.0 mg/L maximum
total cadmium	3.0 mg/L maximum	2.0 mg/L maximum
total organic halogens (as Cl)	3 000 mg/L maximum	1 500 mg/L maximum
total chromium	10 mg/L maximum	10 mg/L maximum
total lead	1 000 mg/L maximum	50 mg/L maximum
total polychlorinated biphenyls	500 mg/L maximum	3.0 mg/L maximum

(6) No person shall

(a) mix or blend waste oil with any other substance for use as a fuel, or

(b) sell waste oil or a mixture of waste oil for use as a fuel

unless the waste oil has been analyzed and shown to meet the specifications indicated

(c) in Column II of the table in subsection (5), if the oil is to be burned in a cement kiln, or

(d) in Column III of the table in subsection (5), if the oil is to be burned in a device other than a cement kiln.



Comments: _____

Part 7 – Administrative Requirements

Section 43 - Registration of Hazardous Waste

Registration of hazardous waste in storage under this section shall be deemed to constitute notification to a director under section 9 (2) of the Act.

Has the company applied for a BCG number (Form 1A)?

☒ Yes ☐ No ☐ Unknown

BCG Number:

Is the information supplied by the company up to date?

☐ Yes ☐ No ☐ Unknown

Comments: _____

Date:

Section 45 - Transport Licence

Does the company have a ministry approved LT license?
LT Number:

☒ Yes ☐ No ☐ Unknown

What waste stream is the company currently allowed to transport?

Comments: _____

Section 46 - Manifest Requirements for Transportation

Request to transporter & receiver copy.

Are the waste manifests available to review during the inspection?

☒ Yes ☐ No ☐ Unknown

Are the waste manifests completed adequately?

☒ Yes ☐ No ☐ Unknown

Is the following requirement met?

☒ Yes ☐ No ☐ Unknown

(9) Consignors, carriers and consignees must retain the applicable copy of a manifest at their principal place of business in British Columbia for a period of 2 years after the hazardous waste is delivered to the consignee.

☐

Comments: Received - scan not best quality but all information appears complete

Section 47 - Loads from Multiple Consignors

Request copies.

Are requirements met for loads from multiple consignors?

☒ Yes ☐ No ☐ Unknown

Comments: Received - scan of documents not best quality but information appears complete.

Section 47.1 - Multiple carrier shipments

Are requirements met for multiple carrier shipments?

☐ Yes ☐ No ☐ Unknown

Comments: _____

Section 47.2 - Shipments of multiple different wastes

Are requirements met for shipments of multiple different wastes?

☐ Yes ☐ No ☐ Unknown

Comments: _____

Section 49 - Analytical methods

Are approved analytical methods used?

☐ Yes ☐ No ☐ Unknown

Date: _____

Comments: _____

Section 53 - Delisting

Have treated wastes been delisted for the facility?

☐ Yes ☐ No ☐ Unknown

Comments: _____

Fuel Blending - Tell me about fuel blending.

Signs

Berms

Gate security

Brenntag.



s.22

53

52

51

50











MINISTRY OF ENVIRONMENT

PERMIT

Under the Provisions of the Waste Management Act

**LIDLAW ENVIRONMENTAL SERVICES LTD./
SERVICES ENVIRONNEMENTAUX LAIDLAW LTEE.**

7783 Progress Way

Delta, British Columbia

V4G 1A3

is hereby authorized to operate
a Special Waste Management Facility
located at 7842 Progress Way, Delta, British Columbia.

This Permit has been issued under the terms and
conditions prescribed in the attached appendices:
01, A-1, B-1, B-2, B-3, B-4, B-5, B-6, B-7, C-1 and C-2.

L. Ouellet
Assistant Regional Waste Manager

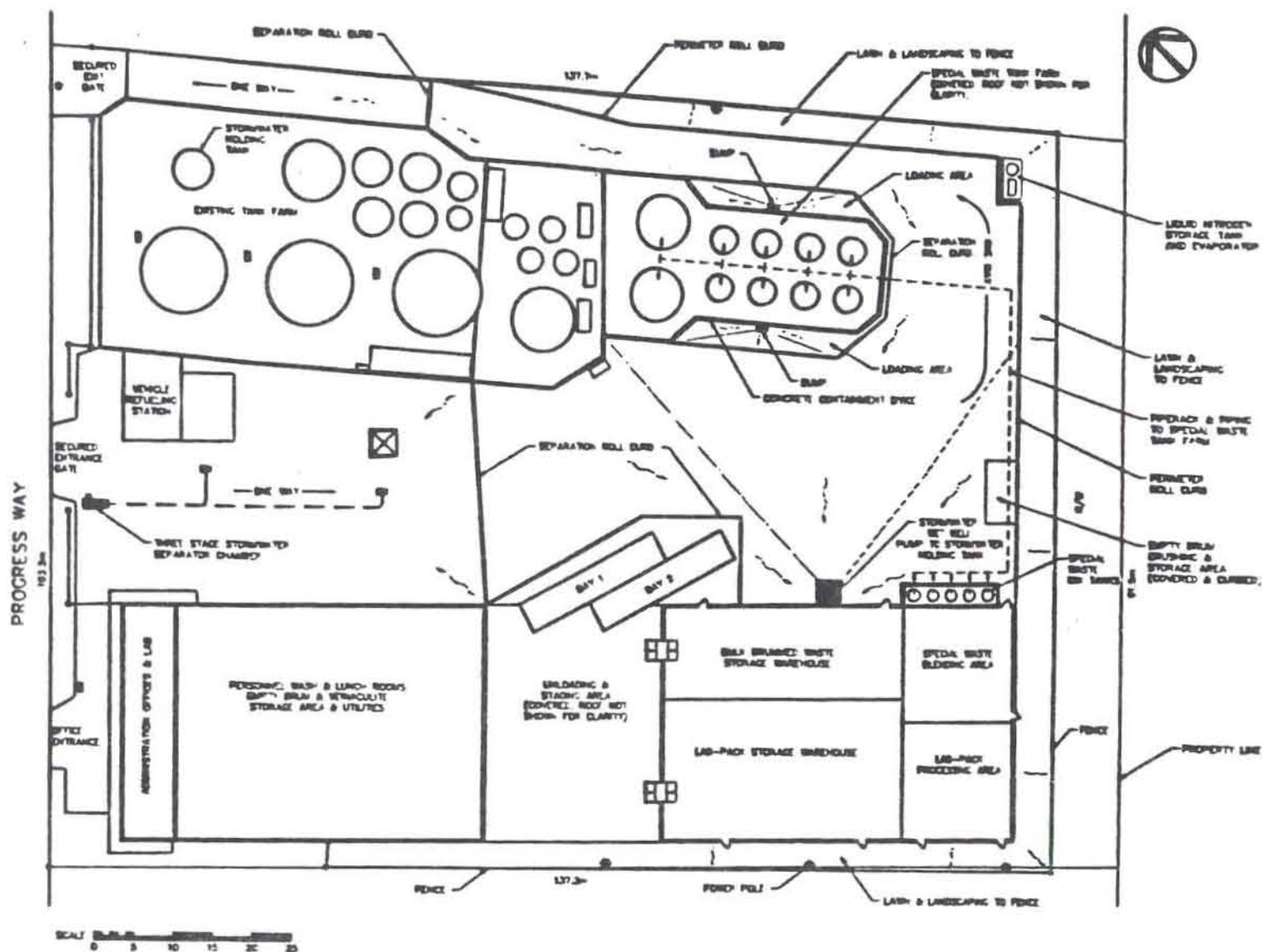
Permit No. **PS-8388**

Date Issued April 25, 1991

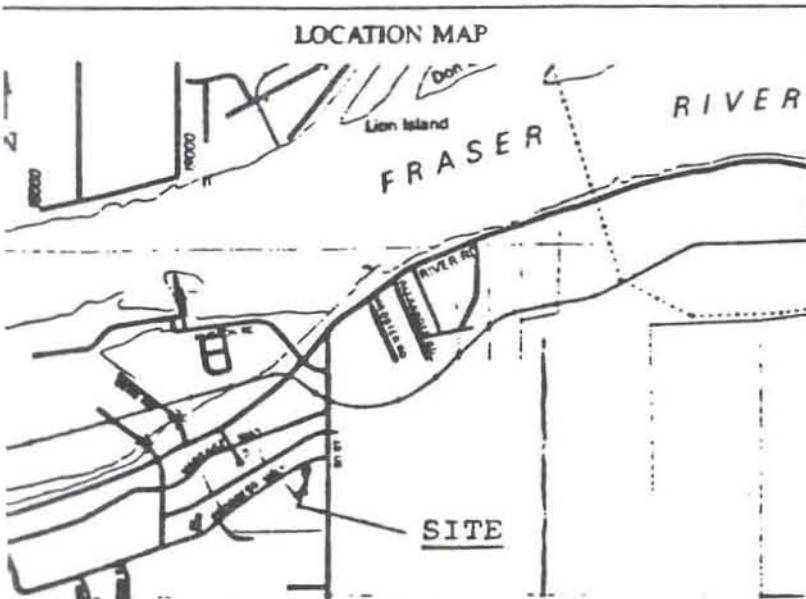
Date Amended Oct -9 '99



SITE PLAN



Legal Description: Lot 163 of District Lot 120, Group 2, Plan 58995
District of New Westminster



Laidlaw Environmental Services Ltd./
Services Environnementaux Laidlaw Ltée.

(Name of applicant(s))

(Date)

(Signature of applicant(s) or agent)

(FOR OFFICE USE ONLY)

April 25, 1991

Date Issued

OCT -9 1991

Date Amended

Assistant Regional Waste Manager

Appendix A-1

to Permit No.

PS-8388

Approval No.



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX 01

to Permit No. PS-8388

(A) The sources of the special wastes to which this appendix is applicable are various generators located primarily in British Columbia and neighbouring provinces and states.

(B) The quantity of special waste which may be stored is limited as follows:

Substance(s) (as specified in the Special Waste Regulation)	Method of Storage	Maximum quantity of special waste to be stored
Waste Oil	Tanks	4,000,000 litres
Waste with Transportation of Dangerous Goods Classification 2, 3, 4, 5, 6.1, 8, and 9 (solid and liquid)	205-L Bulk Drums	650 drums = 133,250 L
	205-L Labpacks	1,200 drums = 246,000 L
	Tanks	1,200,000 litres
	Bulk Containers	80,000 kg

(C) The facility authorized is a special waste management facility as directed in the following appendices, approximately located as shown on the attached Appendix A-1.

(D) The land on which the above special waste is stored and to which this appendix is appurtenant is Lot 163 of District Lot 120, Group 2, Plan 58995, New Westminster District.

(E) The Existing Facilities, as defined in Appendix B-1, shall be complete and in operation on and from the date of this appendix.

(F) The Proposed Facilities, as defined in Appendix B-1, shall be complete and operational before storage and/or treatment pertaining to the Proposed Facilities commence(s).

Date Issued April 25, 1991

Date Amended OCT -9 1991

L-Ouellet
Assistant Regional Waste Manager



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX B-1

to Permit No. PS-8388

A. DEFINITION

"Existing Facilities" and "Proposed Facilities" mean existing facilities and proposed facilities as described in the October 1990 report by Reid Crowther and Partners Ltd., Project No. 22949-000 titled Master Wash Products Ltd., Tilbury Industrial Park, Supporting Technical Information for Special Waste Management Application.

B. POSTING OF SECURITY

- (i) Operation of the Existing Facilities is not authorized until security in the amount of \$1,000,000 is posted with the Minister of Finance in a form acceptable to the Regional Waste Manager.
- (ii) Notwithstanding Section B.(i), operation of the Proposed Facilities is not authorized until additional security in the amount of \$1,400,000 is posted with the Minister of Finance in a form acceptable to the Regional Waste Manager.
- (iii) The Permittee may request the return of security provided the facility has been closed in accordance with the approved closure plan and to the satisfaction of the Regional Waste Manager.

C. REQUIREMENTS AND STANDARDS

The Permittee shall comply with the requirements and standards for management of special waste described in applicable sections of the Waste Management Act Special Waste Regulation (B. C. Reg. 63/88, O. C. 268/88) and the following:

1. Compliance with Siting Standards

- (i) All new works for special waste storage shall be constructed to prevent washout of any special waste by a 200 year flood. The 200 year flood level for this facility is 3.2 metres Geodetic Survey of Canada datum.
- (ii) All existing works for special waste storage shall be modified by December 15, 1991 to prevent washout of any special waste by a 200 year flood. Until such time as all aspects of the facility meet the 200 year flood level, there shall be contingency plans in place for waste not protected to this level.

Date Issued April 25, 1991

Date Amended NOT -9 1991

L. Ouellet
Assistant Regional Waste Manager



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX B-2

to Permit No. PS-8388

2. Modification to Works

The Permittee shall submit to the Regional Waste Manager the plans and specifications of modifications to works for approval. Construction of the works shall be carried out in accordance with the approved plans.

3. Operating Plans

(i) Operation of the facility is not authorized unless the following plans have been submitted to and approved by the Regional Waste Manager:

- (a) Contingency Plan pursuant to Section 11 of the Special Waste Regulation;
- (b) Closure Plan pursuant to Section 14 of the Special Waste Regulation;
- (c) Waste Analysis Plan including but not necessarily limited to:

- (1) The parameters for which each waste will be analyzed and the rationale for selecting these parameters;
- (2) The methods for obtaining representative samples of wastes for analysis;
- (3) The methods of obtaining or testing these parameters;
- (4) The procedures for confirming that each waste received matches the identity of the waste specified on the accompanying manifest.

(d) Operations Plan including but not necessarily limited to:

- (1) shipping/receiving;
- (2) warehouse operation;
- (3) loading/unloading;
- (4) tank farm operation;
- (5) tank filling/emptying;
- (6) internal waste handling and tracking;
- (7) personnel training;
- (8) drum storage and handling;
- (9) class 2 dangerous goods, storage and handling.

(ii) The facility shall be operated in accordance with the approved plans.

(iii) The plans shall be modified to reflect changes in the operation of the facility.

(iv) Modifications to the approved plans shall be submitted to the Regional Waste Manager for approval.

Date Issued April 25, 1991

Date Amended OCT. -9, 1991

L. Ouellet
Assistant Regional Waste Manager



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX B-3
to Permit No. PS-8388

4. Stormwater Management Plan

- (i) A stormwater management plan shall be submitted for approval by the Regional Waste Manager within 60 days of the issuance of the permit.
- (ii) The facility shall be operated in accordance with the approved plan.
- (iii) The stormwater management plan shall include, but not be limited to, collection and monitoring systems to ensure that all discharges of stormwater meet the criteria or standards prescribed in the Special Waste Regulation, with the exception of dioxins and furans, which shall be monitored as directed by the Regional Waste Manager.

5. Fire Safety Plan

- (i) Operation of the facility shall not be authorized until a fire safety plan has been reviewed and accepted in writing by the local assistant to the fire commissioner and has been submitted to the Regional Waste Manager.
- (ii) The fire safety plan shall address fire prevention and response measures, including spark prevention, for the entire facility.
- (iii) The facility shall be operated in accordance with the subject fire safety plan.

6. Blending of Special Wastes

- (i) The Permittee shall not mix or dilute a special waste with any solid or liquid including waste, water, or stormwater for the purpose of evading or avoiding any statute or regulation, either in British Columbia or another jurisdiction, where such regulation might otherwise apply to the special waste either separately or in combination with any other substance.
- (ii) The Permittee shall submit a blending procedures plan to the Regional Waste Manager for approval.
- (iii) Blending is not authorized unless the approved plan is followed to the satisfaction of the Regional Waste Manager.
- (iv) The plan shall be modified as required to reflect changes in the operation of the facility. Modifications to the approved plan shall be submitted to the Regional Waste Manager for approval.

Date Issued April 25, 1991

Date Amended oct -9, 1991

L. Ouellet
Assistant Regional Waste Manager



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX B-4
to Permit No. PS-8388

7. Off Site Shipments

The Permittee shall demonstrate to the satisfaction of the Regional Waste Manager that no special waste is transported from the facility unless all intended consignees are authorized to accept and manage the waste.

8. Temporary Storage

Storage of special waste on a temporary basis, as may be defined or allowed in the Special Waste Regulation, is not authorized unless the temporary storage complies with all the terms and conditions of this Permit.

9. Underground Storage Tank

The use of underground storage tanks for either storage or containment purposes is prohibited at this site.

10. Drum Storage

- (i) All drums of liquid special waste shall not be stacked more than two drums high. Labpacks and drums of solid special waste shall not be stacked more than three drums high.
- (ii) All drums used for transportation and/or storage shall be clean and in sound operating condition.
- (iii) Sufficient aisle space shall be provided between containers of special waste to allow the unobstructed movement of persons, fire protection equipment, spill control equipment and decontamination equipment to any part of the facility.
- (iv) The management of drums of special waste shall be restricted to those areas of the facility which are protected from the weather.

11. Storage of PCB Wastes

Storage of PCB wastes shall be subject to all applicable requirements of the Special Waste Regulation. The Regional Waste Manager shall be notified immediately of the consignment of any PCB waste to the facility.

Date Issued April 25, 1991

Date Amended OCT -9, 1991

L-Ouellet
Assistant Regional Waste Manager



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX B-5

to Permit No. PS-8388

12. Labelling of Special Waste Containers

All drums, tanks and other containers holding special waste shall be affixed at all times with a label indicating the shipping name and the primary hazardous constituent(s) of the special waste.

13. Inspections

- (i) The Permittee shall inspect the storage facility on a weekly basis to detect any irregularities such as deterioration, leaks or spills which may lead to the escape of special waste from the facility or may pose a threat to human health.
- (ii) Records of inspections shall be kept on site and shall be available for inspection by an Officer.
- (iii) Spills shall be reported as per the Spill Reporting Regulation (B.C. Reg. 263/90) and shall be cleaned up to the satisfaction of the Regional Waste Manager.

14. Tank Systems Integrity Testing

The Permittee shall develop and follow a schedule for conducting integrity assessments over the life of the storage/treatment tank systems to ensure that each tank and ancillary equipment retain structural integrity and will not collapse, rupture or fail. The schedule shall be based on the results of past integrity assessments, age of the tank systems, materials of construction, characteristics of the waste and other relevant factors. A copy of the schedule shall be submitted to the Regional Waste Manager by January 1, 1992. Results of integrity testing shall be submitted to the Regional Waste Manager as soon as they become available.

15. Loading and Unloading Areas

Loading and unloading areas shall be designed, constructed, operated and maintained to:

- (i) contain spills and leaks that may occur during loading and unloading;
- (ii) prevent release of special waste to ground or surface waters;
- (iii) contain wash waters resulting from the cleaning of contaminated transport vehicles and loading/unloading equipment;
- (iv) allow for removal, as soon as possible, of collected wastes resulting from spills, leaks and equipment cleaning.

Date Issued April 25, 1991

Date Amended OCT -9, 1991

L. Ouellet
Assistant Regional Waste Manager



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX B-6

to Permit No. PS-8388

16. Air Emission and Effluent Discharge

The Permittee shall ensure that

- (i) any emissions to the atmosphere resulting from the operation of the facility, including ventilation systems from the special waste storage and handling, are controlled to meet approved emission specifications in accordance with an authorization from the Greater Vancouver Regional District, and
- (ii) any discharge of liquid effluent which results from the operation of the facility meets the effluent criteria and standards prescribed in the Special Waste Regulation. Effluent discharges to sanitary sewer are also subject to authorization from the Greater Vancouver Regional District.

17. Special Waste Treatment

- (i) Pursuant to Section 18.(2) of the Special Waste Regulation, the Permittee shall conduct an approved demonstration trial to demonstrate the effectiveness of each process intended to treat special waste at the facility.
- (ii) Unless otherwise directed by the Regional Waste Manager, the Permittee shall retain the services of an independent consultant, knowledgeable in these matters, to audit the demonstration trial and prepare a report for submission to the Regional Waste Manager. This report shall include a description of the treatment process, sampling procedures and analytical methods for untreated wastes and residues remaining after treatment. The report shall address the requirements of Section 18.(3) of the Special Waste Regulation and shall include an assessment of the effectiveness of the treatment process(es).
- (iii) The terms of reference for each demonstration trial shall be submitted to the Regional Waste Manager for approval at least 30 days prior to the beginning of the trial.
- (iv) The Permittee shall submit the trial audit report to the Regional Waste Manager for review and assessment.
- (v) For all Proposed Facilities, no full scale treatment of special waste shall take place until approved by the Regional Waste Manager.
- (vi) For all Existing Facilities, all trial audit reports shall be submitted by July 31, 1991. There shall be no full scale treatment of the special waste after July 31, 1991 unless approved by the Regional Waste Manager.
- (vii) Unless otherwise directed by the Regional Waste Manager, the Permittee shall conduct a new demonstration trial for any treatment process which has been affected by a modification to works.

Date Issued April 25, 1991

Date Amended Oct -2 1991

L. Ouellet
Assistant Regional Waste Manager



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX B-7
to Permit No. PS-8388

D. FINAL CLOSURE PLAN

- (i) Notwithstanding the approved closure plan, the Permittee shall submit to the Regional Waste Manager, at least 90 days prior to the intended closure date of the special waste facility, a final closure plan indicating how the facility will be decommissioned, and how the special wastes will be managed.
- (ii) The final closure plan shall also include terms of reference for an environmental assessment, to be conducted by an independent consultant, addressing potential soil and groundwater contamination. The terms of reference shall be to the satisfaction of the Regional Waste Manager.

Date Issued April 25, 1991

Date Amended NOV -9, 1991

L. Ouellet
Assistant Regional Waste Manager



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX C-1

to Permit No. PS-8388

A. WASTE RECORDS

Notwithstanding Section 6.(1) of the Special Waste Regulation, for each special waste or residue managed or generated at the facility, the following records shall be kept on site, be cross-referenced to specific manifest numbers (Canadian and American) and waste analytical results, and be available for inspection by an Officer:

- (i) the date of receipt/generation;
- (ii) the name of the generator and the process which generated the waste;
- (iii) the waste name, description and physical state;
- (iv) the quantity, the method and date of storing and/or other methods of management such as treating, blending or repacking;
- (v) a record of any special waste shipped off site during this period, including descriptions of waste type and quantity, all consignees involved in the management of the special waste until its ultimate disposal, and the purpose of sending the waste off site. Each waste entry shall be cross-referenced with the shipping manifest numbers.

B. OPERATING RECORDS

The Permittee shall maintain up to date operating records in a written or retrievable electronic form. The records shall be available for inspection by an Officer and shall include but not necessarily be limited to:

- (i) results of waste analyses required in the Waste Analysis Plan;
- (ii) records of facility inspections;
- (iii) summary reports of all incidents that require implementing the contingency plan;
- (iv) emergency systems testing records;
- (v) analytical results, quantity and date(s) of each liquid discharge to sanitary sewer system pursuant to Sections 17 and 19 of the Special Waste Regulation;
- (vi) stormwater monitoring results;
- (vii) records of manifest discrepancies;
- (viii) personnel training records and all relevant training procedures and manuals.

Date Issued April 25, 1991

Date Amended OCT -9, 1991

L. Ducllet
Assistant Regional Waste Manager



MINISTRY OF ENVIRONMENT
Waste Management Branch

APPENDIX C-2
to Permit No. PS-8388

C. QUARTERLY REPORTING

The Permittee shall prepare and submit to the Regional Waste Manager, a quarterly report including the following information:

- (i) Tabulated on a monthly basis by waste classification:
 - (a) quantity of waste received;
 - (b) quantity of waste processed and the method of processing (bulking, stabilization, etc.);
 - (c) quantity of waste transported off site.
- (ii) The waste inventory on the last day of each month. This shall be tabulated by waste classification, storage method, and location.
- (iii) Stormwater monitoring results.
- (iv) Monitoring results of effluent discharge to sanitary sewer.

The report shall be submitted to the Regional Waste Manager within thirty days of the end of each quarter. The first report shall be submitted by July 31, 1991.

D. MONITORING OF STORMWATER DISCHARGE

Stormwater monitoring and record keeping shall be in accordance with the approved stormwater management plan.

E. ENVIRONMENTAL AUDIT

An environmental audit of the facility shall be carried out annually by an independent consultant. The audit shall review the facility operations and practices related to meeting regulatory requirements including transportation requirements. In addition, the audit shall identify areas of non-compliance with respect to the terms and conditions of the Permit and provide recommendations for restoring compliance. The terms of reference for the audit and choice of consultant shall be suitable to the Regional Waste Manager and shall be submitted for review at least 30 days prior to the start of the audit. A report detailing the results of the audit shall be submitted to the Regional Waste Manager on or before March 1 of each year.

JAN 31 of each year

Date Issued April 25, 1991

Date Amended SEP -2 1991

L. Ouellet

Assistant Regional Waste Manager