

May 12, 2011

File: PR-17343

Howie Aikman
Western Forest Products Inc.
Gold River Forest Operation
PO Box 220
Gold River BC V0P 1G0

Dear Mr. Aikman:

Re: Site Inspection Dated September 28, 2010

On September 28, 2010 an inspection was completed on Western Forest Products Inc.'s dryland sort operating area located at Broderick Creek on the west coast of Vancouver Island. Permit PR-17343 covers refuse discharge site E256014 and burn discharge site E219959. Based on the inspection, it was determined that Western Forest Products Inc. is currently out of compliance with Permit PR-14614. The attached report includes detailed findings of the inspection. Outlined below are the items that require action:

Permit Non-Compliance Issues:

- Section 2.1 "...cover material [shall] be applied once every 20 operating days and at least once per month..."*
At the time of the inspection, it was noted that the landfill was not covered. Please ensure that the landfill is covered with a suitable material as required.
- Section 2.2 Provision of fencing, site access, vehicle safety barriers, surface water diversionary works, firebreaks and site restoration as required, shall be carried out to the satisfaction of the Regional Waste Manager.*
It was observed during the inspection that landfill material was located adjacent to brush and trees. Please ensure that adequate firebreaks are maintained.

.../2

Ministry of
Environment

Coast Region
Environmental Protection Division

Mailing Address:
2080A Labicux Rd
Nanaimo BC V9T 6J9

Telephone: 250 751-3100
Facsimile: 250 751-3103
Website: www.gov.bc.ca/cnv

Y900 3.117

Howie Aikman
Western Forest Products Inc.
Gold River Forest Operation

- 2 -

May 12, 2011

Environmental Stewardship Issues:

Some environmental stewardship issues were noted as well. Environmental stewardship issues are those that require attention to ensure better protection of the environment and should be followed up with a report back to the Regional Manager outlining the steps and schedule of actions taken to resolve the environmental stewardship issues as soon as possible.

- The woody debris around the skids should be cleaned between loads to prevent leachate generation and release to the marine receiving environment.
- Logs were noted in the burn site. Whenever possible please either leave this material within the setting or utilize it rather than burning it.
- A burn plan should be prepared prior to future burning to ensure compliance with the operational requirements for controlled open burning listed in Section 2.4 of Permit PR-17343.
- To ensure that future site restoration will be carried out to the satisfaction of the Regional Waste Manager, a landfill closure plan should be submitted for approval.

Please be advised that failure to comply with terms and conditions of a Permit is an offence under the *Environmental Management Act* and the discharger may be subject to prosecution or other enforcement action.

Thank you for your attention to this matter. If you have any questions or concerns please contact me at 250 751-3193 or Katherine.Pearce@gov.bc.ca.

Yours truly,

Katherine Pearce
Environmental Protection Technician
Coast Region

Attachments

PEARCE/jlk

\\Tarpon\S40133\EnvProtection_Share\General\SAVE\2011\May\PR-17343 (Brodict Creek) Inspection Letter.docx

cc: Anne Molony, Campbell River Forest District, Ministry of Forests, Lands & Natural Resource Operations, 370 S Dogwood St, Campbell River, BC V9W 6Y7

COMPLIANCE REVIEW RECORD

Environmental Protection

File number: PR-17343

Client name: Western Forest Products Ltd.

Address: Gold River Forest Operation, PO Box 220, Gold River, BC V0P1G0

Client rep: Howie Aikman

Telephone No.: 250-283-2221

Date of Inspection: Sept. 28, 2010

Completed Anne Molony, Compliance and Enforcement, Ministry of
by: Natural Resource Operations

COMPLIANCE:

IN or OUT:

OUT

AUTHORIZATION REQUIREMENTS:

Review Period: from

to

Findings: <u>a capital "X" should be placed in the appropriate column</u>		YES	NO	N/A	??
a) Does discharge have an authorization number?		X			
b) Is all discharge monitoring conducted as required?				X	
c) Is all discharge monitoring reported as required?				X	
d) Is all discharge monitoring data reviewed in compliance with the authorization?				X	
e) Is all environmental monitoring conducted as required?				X	
f) Is all environmental monitoring reported as required?				X	
g) Is all environmental monitoring data reviewed in compliance with authorization?				X	
h) Is environmental monitoring indicating achievement of receiving environment quality criteria?				X	
Activity:	<u>INS</u>	NCD Matrix Level:	<u>1</u>	NCD Matrix category:	<u>A</u>
Comments	<u>Operations were not active at time of inspection.</u>		Compliance tool initiated:	<u>Advisory</u>	
AUTHORIZATION SUBSECTION	DETAILS		COMPLIANCE		
			IN	OUT	??
1.1 Authorized Discharge					
1.1.1 Maximum rate of discharge is 500 m3/yr	The maximum authorized rate of discharge is 500 m3.		X		
1.1.2 Components of refuse			X		
1.1.3 Location of Landfill	Location of landfill site appears correct as per Site Plan A in Permit.		X		
1.2 Maximum volume of wood waste that may be burned is 5,000 m3/yr	Permittee rep. estimates that less than 2,000m3 is burned annually.		X		
2.1 Landfill Operation	Cover material is required to be applied once every 20 operating days and at least once per month. Landfill was not covered at time of inspection.			X	
2.2 Site Preparation and Restoration	Material located landfill site is adjacent to brush and trees, firebreak is required.			X	
2.3 Waste Reduction and Alternate Disposal	Recyclable metals piled on sort.		X		
2.4 Operational Requirements for Controlled Open Burning	Copy of burn plan requested.				
2.4.1 Location	Burn pile located on dryland sort. Material also piled west of DLS.				X
2.4.2 Waste Segregation			X		
2.4.3 Frequency	Permittee rep. Indicated frequency meets permit requirement.		X		
2.4.4 Timing			X		
2.4.5 Fire Control			X		
DISCHARGE MONITORING	DETAILS	Reporting Frequency	COMPLIANCE		
			IN	OUT	??
N/A					
RECEIVING ENVIRONMENT MONITORING	DETAILS	Reporting Frequency	IN	OUT	??
N/A					

DETAILED COMMENTS AND INSPECTION OBSERVATIONS:

Permit PR-17343 was issued on July 7, 2004. The Permit covers refuse discharge site E256014 and burn discharge site E219959.

The woody debris around the log bunks should be cleaned between loads to prevent leachate generation and release to the marine receiving environment.


Logs were noted in the burn site (E219959). Whenever possible please either leave this material within the setting or utilize it rather than burning it.

The Permit requires that cover be applied once every 20 operating days and at least once per month. In addition, an adequate firebreak is also required.

RECOMMENDED FOLLOW-UP:

Ensure that the landfill is covered as required and that an adequate firebreak is in place. The woody debris around the log bunks should be cleaned between loads to prevent leachate generation and release to the marine receiving environment. Open burning is restricted to the location designated as the burning area in the permit. The Permittee is requested to submit a burn plan and a closure plan.

COMPLIANCE REVIEW CONDUCTED BY (SIGNATURE):


For details on Non-Compliance Decision (NCD) levels and categories see
www.env.gov.bc.ca/main/prgs/docs/ce_policy_and_procedure.pdf

Ministry of Environment	Coast Region Environmental Protection Division	Mailing Address: 2080A Labieux Rd Nanaimo BC V9T 6J9	Telephone: 250 751-3100 Facsimile: 250 751-3103 Website: http://www.gov.bc.ca/env/
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DRYLAND SORT CHECKLIST

PERMIT NO(s): PR-17343/S24144

COMPANY/CONTRACTOR: Western Forest Products Ltd.

LOCATION: Brodict Creek

CONTACTS: Howie Aikman

INSPECTOR(s): Anne Molony, Mark Ross

DATE AND WEATHER: September 28, 2010 Fog

GPS COORDINATES (DLS/LF): 49 51' 00.0" N 126 53' 00.0" W

VOLUME OF LOGS SORTED ANNUALLY: Not active.

IMMEDIATE ACTION REQUIRED (note target date for each action): RESOURCES AT RISK:

Cover landfill with suitable material as required. Ensure adequate firebreak around landfill area.

PROXIMITY TO SENSITIVE USERS (e.g.: first nations, tourist facilities, fish farms, etc.):

Brodict Creek is located on Nootka Island on the west coast of Vancouver Island. The area is subject to a boat traffic, particularly during July and August when tourism volumes peak.

PUBLIC COMPLAINTS (in the last year): No public complaints within the last year.

A) WATER MANAGEMENT

1. Surface


- a) Is the surface paved? No
- b) Is the working area cleaned between loads? No
- c) Is the area under the log bunks free of excessive waste build-up? Some debris noted.

2. Surface Drainage

- a) Is the working surface graded to prevent ponding of water? Surface satisfactory at time of inspection.
- b) Are ditches designed to handle expected storm flows? Yes
- c) Is there evidence of ditch failure? No
- d) Is the sort protected from run-on drainage from upslope areas? Yes

3. Water Treatment

- a) Is the run-off directed to sediment settling facilities? Yes
- b) Are the ponds designed to: Unknown
 - i) allow easy clean out of solids?
 - ii) collect oil and grease?
 - iii) prevent short circuiting in the pond?Pond dimensions: Ditchline at back wall with culvert.
- c) Is there a procedure in place to inspect the pond(s) and have them cleaned when required? Unknown
- d) Are there other obvious sources of solids at the dryland sort which are not directed to treatment? No


for Environmental Protection

B) REFUSE MANAGEMENT

1. Refuse containment at the dryland sort

- a) Is the refuse stored in a manner that prevents loss to the environment when loading for haul out? Yes
- b) Is the refuse hauled out regularly? Unknown
- c) Is the refuse storage area protected from run-on drainage? Yes
- d) Is leachate observed? No
- e) Is the leachate being directed to water treatment facilities? N/A

2. Burn Conditions - Estimated Annual Volume: Less than 2,000m³
Permitted Annual Volume: 5000m³
Compliance? Yes

- a) Was a burn underway during this inspection? No
- b) Does the frequency of burning meet the permit requirement? Yes
- c) Are the actual number of burns less than authorized? Yes
- d) Is only readily combustible refuse from the sort being burned? Yes
- e) Are the fines being excluded from the burnable refuse? Yes
- f) Is auxiliary air being supplied? No (not a requirement of the permit)
- g) Does the auxiliary air volume meet open burning guidelines? N/A

List blower specification (i.e.: motor power, fan speed, fan size and diffuser length and diameter): N/A – auxiliary air not supplied.

- h) Is refuse being added to the fire continually? N/A
- i) Is fire out at the end the authorized burn period? N/A
- j) Is there a burn plan to assure: Requested copy of burn plan.
 - i) weather condition will promote rapid dispersion of smoke before ignition?
 - ii) is the pile is built to promote combustion?
 - iii) an attendant is always on duty during the burn?
 - vi) fire tools are available?
 - vii) an adequate firebreak to combustibles?

3. Land fill - Estimated Annual Volume: less than 500m³

Permitted Annual Volume: 500 m³

Compliance? No, not covered with suitable material as required.

a) Is the landfill covered as required? No

b) Is the working face of the landfill minimized? Yes

c) Does the refuse contain excessive large woody debris? No

d) Is the landfill cover: Not covered.

i) at least 15 cm deep (60 cm for final cover)?

ii) material tight enough to prevent infiltration

iii) free of any cracking?

iv) competent right to the toe of the fill?

e) Is the landfill contoured to shed precipitation? No

f) Is the landfill being constructed in lifts of less than 3 metres? unknown

g) Is the site protected from run on from upslope drainage? Yes

h) Is leachate observed? No

i) Is there evidence of steam venting ? No

j) Is the shop waste being landfilled in a separate area? Shipped out for disposal

k) Is there evidence of putrescible refuse being landfilled? No

l) Is the landfill completely within the permitted site plan area? Appears as though it is as per Exhibit A map.

m) Are any other site being used for landfilling refuse? No

n) Is there a closure plan in place? No (not a requirement of the permit).

4. Alternatives (Reduce, Reuse and Recycle)

a) Is any refuse authorized for use as a soil amendment? No

b) Is the refuse volume being minimized by leaving as much waste in the cut block by operational methods? Yes, production is "camp run" (no on-site handling, sorting or manufacturing)

c) Are value added materials produced from the refuse? No

d) Are metal wastes recycled? Yes, barged out (piles of culverts and bin of metal on dryland sort).

C) CAMP MANAGEMENT: N/A – Camp not present

1. Camp Incinerator Operation

- a) Is the camp incinerator in operational condition?
- b) Is the refuse stored properly prior to incineration?
- c) Is there evidence of wildlife attraction?
- d) Is the ash removed from the incinerator regularly?
- e) Is the ash landfilled as authorized?
- f) Is auxiliary fuel supplied?
- g) Is the camp less than 100 persons?

2. Camp Sewage Treatment Operations

- a) Are all the authorized works operational?
- b) Is the outfall line intact?
- c) Are maintenance records available for inspection?
- d) Is there any evidence of environmental impact from this discharge?

3. Environmental Management

- a) How does this operation get its environmental information?
 - i) Pollution Prevention inspectors?
 - ii) Ministry of Environment web-site?
 - iii) Company head office? Yes
 - iv) Industry association? Yes
- b) Has this operation been subject to an internal environmental audit? Yes

D) RECEIVING ENVIRONMENT

1. Dryland Sort Drainage

- a) Is there visible evidence of impact at the discharge on:
 - i) the receiving water quality? No
 - ii) on the bottom? No
- b) Does the stormwater discharge enter fish bearing water? Ocean
- c) Is the stormwater discharge into fresh waters or an estuary? No
Stream Classification (from plan) N/A

2. Refuse Disposal Site Drainage

- a) Does the leachate enter fish bearing water? No
- b) Does the leachate discharge into fresh waters or an estuary? No

3. Receiving Water Monitoring

- a) suspended solids: N/A
- b) oil & grease: N/A
- c) Toxicity (daphnia): N/A

E) PETROLEUM PRODUCTS MANAGEMENT

Maximum Storage Volume: Gasoline: 10,000 Litres when operational
Diesel: 35,000 Litres when operational

1. Are the storage tanks contained? Yes

2. Is the containment:

- i) volume adequate (110% of largest tank)? Yes (envirotanks)
- ii) water tight? N/A – Yes
- iii) protected from precipitation? No
- iv) area drained by pump or siphon: Yes
- v) drainage treated with an oil/water separated?

3. Are there any pipes penetrating the containment walls? No

4. Are spills in the fuelling area contained? N/A

5. Are valves secured:

- i) at the tanks? Unknown
- ii) at the point of delivery? Unknown

6. Are other storage areas secured?

- i) heating oil – N/A
- ii) light plant – yes
- iii) shop tanks - N/A
- iv) other

7. Does the operation have a spill contingency plan? Yes

8. Is adequate spill containment and clean-up equipment on site? Yes

9. Does the operation provide ongoing training on spill containment and clean up procedures? Yes

10. Is there a spill reporting system in place? Yes

11. Has this operation had a reportable spill? No

12. Has the spill reporting system been used? No

F) SPECIAL WASTE MANAGEMENT

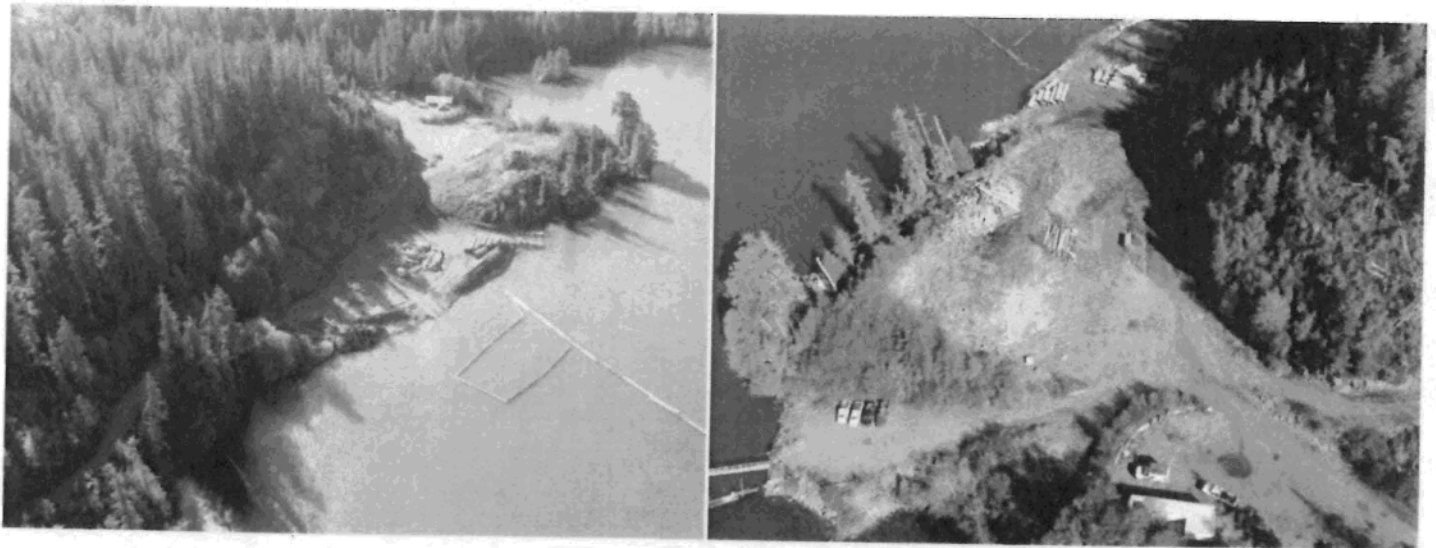
Hazardous wastes generated at this operation and maximum storage volumes:

Waste Oil –100 Litres when operational
Anti Freeze – 20 Litres when operational
Batteries –less than 10
Others – N/A

- 1. Do these volumes meet the registration/permit volumes of the Hazardous Waste Regulation?**
- 2. Are there procedures in place to ensure safe collection and storage of special wastes? Yes**
- 3. Do the temporary hazardous waste storage areas provide the required spill containment? N/A**
- 4. Is there a transport plan in place to ensure recycling or proper disposal of special wastes? Yes**
- 5. Are copies of hazardous waste manifests retained? Yes by contractor**
- 6. Is there a spill contingency plan in place for hazardous waste? Yes**
- 7. Is spill containment and clean up equipment on site? Yes**
- 8. Is training in spill containment and clean up provided? Yes**
- 9. Is used equipment dismantled on a containment pad? N/A – completed off-site**
- 10. Are all fluids and batteries removed from stored equipment? Yes**
- 11. Is there visual evidence of significant hydrocarbon contamination of soils? No**

List stained sites and approximate surface area - None

Overview of dryland sort area



Skids

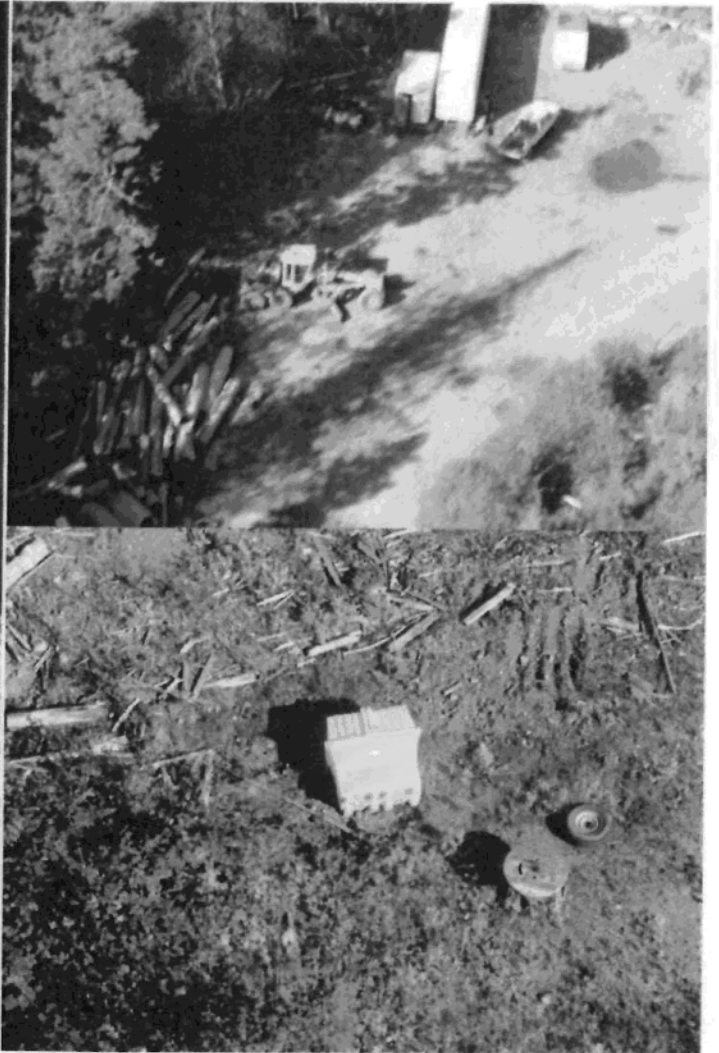


Crushed culvert

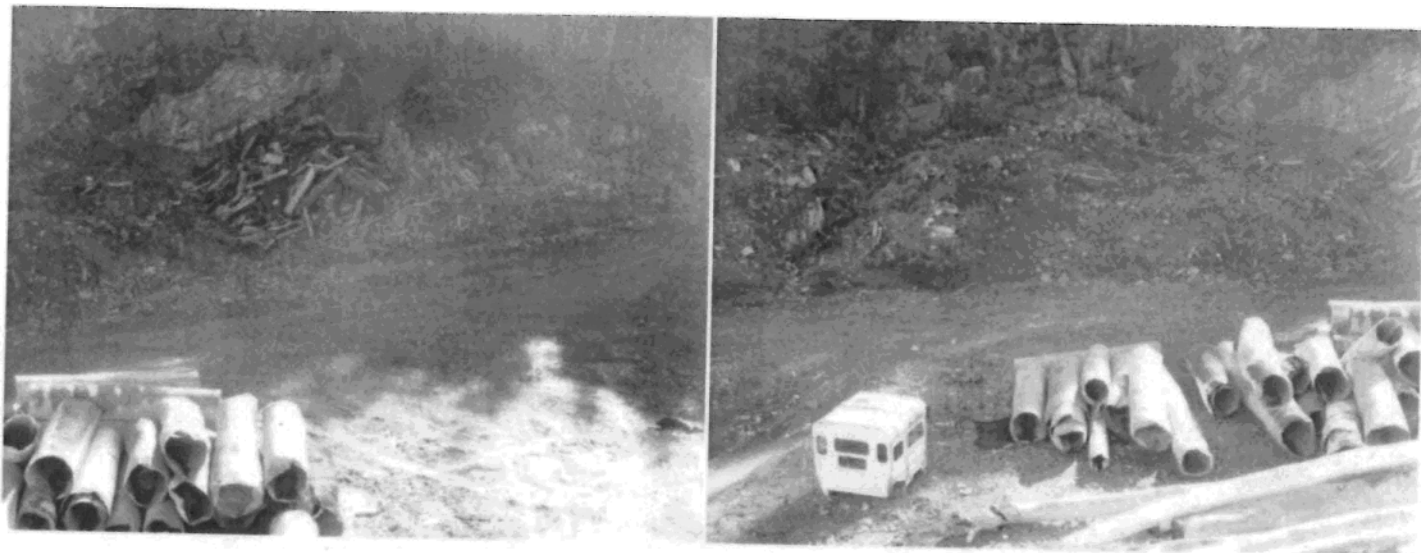


PR-17343 Broderick Creek (Western Forest Products Ltd.)

Fuel storage, culverts, spill kit



Debris at burn site

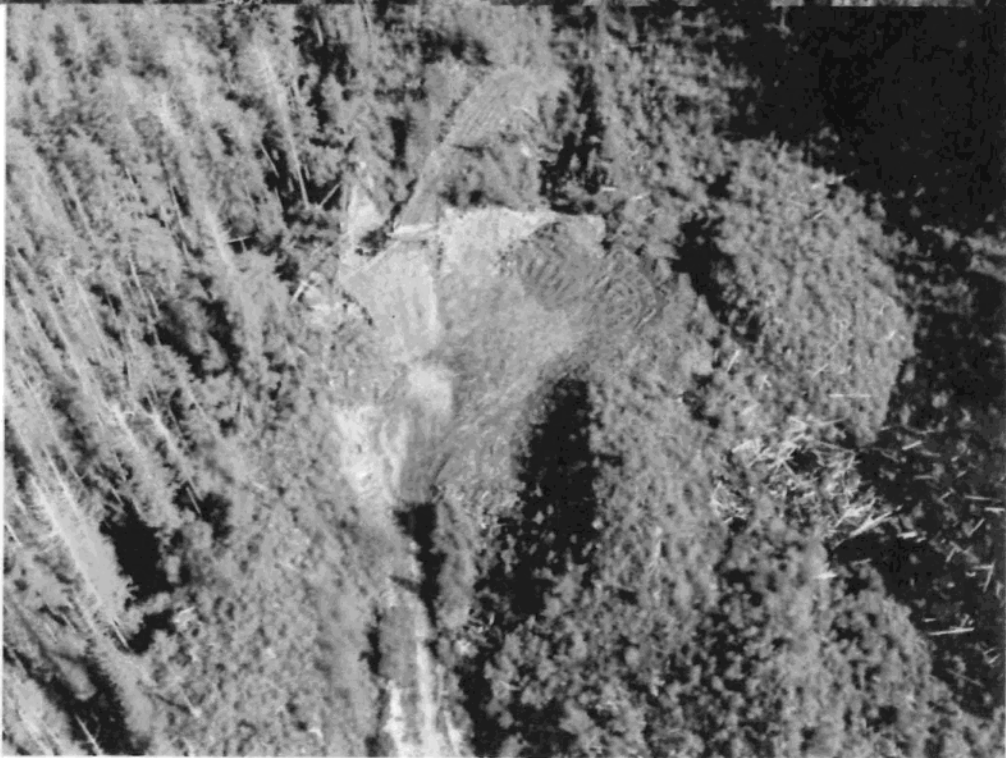


Debris Pile



PR-17343 Broderick Creek (Western Forest Products Ltd.)

Landfill site



Devos, Ruth-Ann E ENV:EX

From: Devos, Ruth-Ann E ENV:EX
Sent: Tuesday, February 19, 2013 10:05 AM
To: 'jreynolds@westernforest.com'
Subject: PR-15037 Blowhole Bay

Dear Mr. Reynolds,

Thank you for your letters of May 31, 2012 and September 28, 2012 concerning the non-compliance issues, other legal requirements and environmental stewardship issues that were identified in the May 2011 site inspection at Blowhole Bay. I have conducted an office review of the information submitted and have found Western Forest Products to be in compliance with all requirements of Permit PR-15037, other legal requirements and all of the environmental stewardship issues except for the Closure Plan. The Closure Plan submitted was found to be inadequate. Please see the inspection report for details. I have requested the submission of an adequate Closure Plan.



PR-15037
Inspection Report Fe

Sincerely,

Ruth-Ann Devos
Environmental Protection Officer
Vancouver Island Region
phone: 250-751-3187
fax: 250-751-3103
email: RuthAnn.Devos@gov.bc.ca

 Please consider the environment before printing this e-mail.



Ministry of Environment
Inspection Record

**Environmental
Protection
Division**

Inspection: Number: 7949
Date: 2013-01-23

Status: FINAL
Total Non- Compliance(s): 0

Trigger: Planned

EP System: AMS

EP Number: 15037

EP Status: Active

Region: West Coast

Regional Office: Nanaimo

Audit Number:

Regulated Party: WFP Western Lumber Ltd.

Contact(s): Jack Reynolds

Address:

WFP Western Lumber Ltd.
c/o Western Forest Products Inc.
Gold River Forest Operation
PO Box 220, Gold River, BC V0P 1G0

Telephone Number: 250-283-2833

Fax No:

Email:

**Inspector
Name(s):**

Ruth-Ann Devos

Risk Ranking: 1 to 2 = Medium

Location Description:

Receiving Environment: Land Based

Latitude: 49.828313

N Longitude: 126.676211

W

The facility is located in Blowhole Bay along the Tahsis Inlet on the west coast of Vancouver Island.

Summary

Incidents of Non-Compliance Observed: **No**

MONITORING AND REPORTING REQUIREMENTS

Inspection Period: **From:** 2010-09-28

To: 2013-01-23

Requirement Source:

Activity: Office Review

Waste Type: Refuse

Non-Compliance Decision Matrix Level:
Level 0

Non-Compliance Decision Matrix Category:
Category 0

Inspection Summary:

During a site inspection in May, 2011, Western Forest Products was found to be out of compliance with two Sections of Permit PR-15037: components of the refuse and segregation of burnable wastes. There were also several other legal requirements and environmental stewardship issues noted. Since the inspection Western Forest Products took the required action and reported the results. During this office review Western Forest Products has been found to be in compliance with all requirements of Permit PR-15037 and the other legal requirements and all environmental stewardship issues except for the closure plan. Although a closure plan was submitted it was considered to be inadequate. It has been requested that Western submit an adequate closure plan.

Response:

Notice

Compliance Summary

	In	Out	N/A	N/D
Discharge	1	0	0	0
Operations	1	0	0	0

Inspection Details

Requirement Type:	Requirement Description:	Details/Findings:	Compliance:
<u>Discharge</u>	Section 1.1.2 The components of the refuse which may be discharged are wood waste, mineral soil, logging camp incinerator ash, non-recyclable metallic waste and the residue of combustion from the open burning of woodwaste.	Mr. Reynolds reported that unauthorized materials were removed from the waste site shortly after the September 2010 inspection. Mr. Reynolds visited the site on May 23, 2012 and confirmed that there were no unauthorized waste materials being open burned.	<u>In</u>

Operations	Section 2.4 Burnable wastes shall be segregated from non-combustible materials and only readily burnable material originating from the dryland log sort shall be open-burned.	Mr. Reynolds reported that unauthorized materials were removed from the waste site shortly after the September 2010 inspection. Mr. Reynolds visited the site on May 23, 2012 and confirmed that there were no unauthorized waste materials being open burned.	In
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Inspection Details Continued

ACTIONS REQUIRED BY REGULATED PARTY & ADDITIONAL COMMENTS:

During the inspection there were other legal requirements noted. To gain compliance with these the following were requested:

- 1) Determination of whether hazardous wastes were in quantities above those stipulated in Schedule 6 of the Hazardous Waste Regulation,
- 2) Determination of the maximum storage volume of petroleum products on site; and,
- 3) Compliance with all portions of the Contaminated Sites Regulation.

In Mr. Reynolds letter of May 31, 2012, he informed that all hazardous waste materials have been removed, the maximum storage volume of petroleum products is 7,000 L and surface rainwater runoff is collected and treated by an oil water separator. Therefore Western Forest Products is in compliance with the legal requirements noted above.

There were also several environmental stewardship issues identified during the inspection. On May 31, 2012, Mr. Reynolds submitted the requested Closure Plan, reported that a Burn Plan is in place and prepared an action plan for the other environmental stewardship issues. On September 28, 2012, Mr. Reynolds reported the actions that had been taken to address each of the remaining environmental stewardship issues. Western Forest Products has appropriately addressed all environmental stewardship issues, except for the Closure Plan. The Closure Plan that was submitted was reviewed and deemed to be inadequate. For expectations on what is considered an adequate Closure Plan please refer to Section 3(2) of the Code of Practice for Industrial Non-Hazardous Waste Landfills Incidental to the Wood Processing Industry and Section 8.2 of the Wood Waste Landfills Guidelines. Both of these documents can be found at the following website:
http://www.env.gov.bc.ca/epd/industrial/regs/codes/industrial_land/index.htm

Please submit an Conceptual Closure Plan to address the remaining environmental stewardship issue.

INSPECTION CONDUCTED BY:

Signature:

Ruth-Ann Devos

Signed Date:

2013-02-19

ENCLOSURE(S) TO REGULATED PARTY & DESCRIPTION:

file://P:\WANS\SHARE\EPD\EPD_SHARED\Compliance\CVIS

REGULATORY CONSIDERATIONS:

Ministry of Environment	West Coast Region Environmental Protection Division	Mailing Address: 2080-A Labieux Rd Nanaimo, BC V9T 6J9	Phone: (250) 751-3100 Fax: (250) 751-3103
Website: http://www.gov.bc.ca			



Ministry of Environment Inspection Record

**Environmental
Protection
Division**

Inspection Number: 17273		Inspection Status: FINAL	
EP System: <u>AMS</u>		Inspection Date: 2013-07-24	
EP System Number: 8663		EP System Status: <u>Active</u>	
Region:		Office:	
Trigger: <u>Planned</u>		Incidents of Non-Compliance Observed: <u>No</u>	
Non-Compliance Decision Matrix Level: <u>Level 0</u>		Non-Compliance Decision Matrix Category: <u>Category 0</u>	
Inspector Name(s): Ruth-Ann Devos		CPIX: <u>1 to 2 = Medium</u>	
Audit:		Total Non-Compliance(s): 0	
Regulated Party: WESTERN FOREST PRODUCTS INC.			
Regulated Party Contact(s): Jack Reynolds and Bruce Creelman			
Legal Address: 118 - 1334 Island Highway Campbell River B.C. V9W 8C9			
Phone No: 250-283-2833		Fax No: (250) 724-7762	
Contact Email: jreynolds@westernforest.com			
Location Description or Site Address: The landfill facility is located in Nesook Bay in Nootka Sound.			
Latitude: 49.756 N		Longitude: 126.4202 W	
Receiving Environment(s): <u>Land Based</u>			

Summary

MONITORING AND REPORTING REQUIREMENTS	
Inspection Period: From: 2013-07-24 To: 2013-07-24	
Requirement Source: Permit	
Activity: <u>On Site</u>	Waste Type: <u>Refuse</u>
Inspection Summary: Although there were no incidents of non-compliance observed, it was noted that compliance with Sections 1.1.1 and 4 could not be determined and more information is required.	Response: <u>Notice</u>
ACTIONS REQUIRED BY REGULATED PARTY: See attached notice for required actions.	
ADDITIONAL COMMENTS:	

Compliance Summary	In	Out	N/A	N/D
Discharge	3	0	0	1
Operations	3	0	0	1

Inspection Details

Requirement Type: <u>Discharge</u>
Requirement Description: 1.1.1 The maximum authorized rate of discharge is 4,000 m3/year.
Details/Findings: The current discharge rate was not known at the time of the inspection. The estimated annual discharge rate should be submitted.

Compliance: <u>Not Determined</u>
Requirement Type: <u>Discharge</u>
Requirement Description: 1.1.3 The components of the refuse which may be discharged are wood waste, inert material and residue of combustion from the open burning of wood waste.
Details/Findings: Only wood waste was evident in the landfill.
Compliance: <u>In</u>
Requirement Type: <u>Discharge</u>
Requirement Description: 1.1.4 The authorized works are a landfill as directed, located approximately as shown on attached Appendix A-1.
Details/Findings: The landfill is located approximately as shown on attached Appendix A-1.
Compliance: <u>In</u>
Requirement Type: <u>Discharge</u>
Requirement Description: 1.2.1 The authorized works are a controlled open burning operation utilizing a forced air system as directed, approximately located as shown on attached Appendix A-1.
Details/Findings: The open burning operation was located as shown on attached Appendix A-1. Mr. Creelman informed that a forced air system is brought in and utilized when the site is operational.
Compliance: <u>In</u>
Requirement Type: <u>Operations</u>
Requirement Description: 3 The permittee shall maintain the landfills authorized in Subsection 1.1 as Level B operations in accordance with the Pollution Control Objectives for The Forest Products Industry of BC with the exception that intermediate covering is not required at this time. Specific operating instruction may be issued by the Regional Waste Manager.
Details/Findings: The landfill is maintained as a level B operation and intermediate cover is applied.
Compliance: <u>In</u>
Requirement Type: <u>Operations</u>
Requirement Description: 4 Provision of fencing, site access, vehicle safety barriers, surface water diversionary works, firebreaks and site restoration as required, shall be carried out to the satisfaction of the Regional Waste Manager. The Permittee shall maintain a 20 m buffer strip along the drainage channel on the east side of the landfill site authorized in Section 1.1.
Details/Findings: Due to the remoteness of the site it is not felt that fencing or vehicle safety barriers are required. The surface of the landfill is graded towards the west, and there is surface water diversionary works

along the south and north sides directing runoff to a depression and then forested area off the northwest corner of the landfill. The east end of the landfill is very close to the drainage channel and it could not be confirmed whether the 20 m buffer strip was maintained or whether the surface water diversionary works in place were adequate to manage runoff in an appropriate manner.

Compliance: Not Determined

Requirement Type: Operations

Requirement Description:

5 The permittee is encouraged to segregate for recycling and reuse, where possible, materials destined for disposal at this site.

Details/Findings:

Metals are segregated for recycling when the site is operational.

Compliance: In

Requirement Type: Operations

Requirement Description:

6 The burning operation shall be restricted to a site designated as a burning area by the Regional Waste Manager.

Burnable wastes shall be segregated from non-combustible materials and only readily burnable material originating from the dryland log sort operation shall be open-burned. No waste shall be burned which is unacceptable to the Regional Waste Manager.

The maximum burning frequency twice per month. Each burn shall comprise one continuous period necessary to reduce the wood waste to ashes, but shall not exceed five days in duration.

Burning shall take place only when an attendant is on duty and when conditions promote rapid combustion and dispersion of combustion products. No burning shall take place during periods of fire hazard or when burning is prohibited by other government agencies.

Suitable approved devices shall be available for extinguishing fires to prevent them from surrounding areas. A fireguard shall be cleared and maintained free of combustible materials.

Details/Findings:

Mr. Creelman informed that when the site is operational, the burning will occur as stipulated in this section.

Compliance: In

Were the following collected during inspection:

Samples? ☐ Photos? ☐ EMS Number

Other (please specify)

Is the Inspection related to an EA Project? ☐ EA Project Certificate Number:

INSPECTION CONDUCTED BY:

Signature

Ruth-Ann Devos

Date Signed

2014-03-31

ENCLOSURE(S) TO REGULATED PARTY & DESCRIPTION:

REGULATORY CONSIDERATIONS:

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DISCLAIMER:

Please note that sections of the permit, regulation or code of practice referenced in this inspection record are for guidance and are not the official version. Please refer to the original permit, regulation or code of practice.

To see the most up to date version of regulations and codes of practices please visit:

<http://www.bclaws.ca/>

If you require a copy of the original permit, please contact the inspector noted on this inspection record or visit: <http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publicly%20Viewable%20Authorizations>

It is also important to note that this inspection record does not necessarily reflect each requirement or condition of the authorization therefore compliance is noted only for the requirements or conditions listed in the inspection record.

Ministry of Environment	BLANK	Mailing Address:	Phone: (250) 751-3100
	Region	2080-A Labieux Rd	Fax: (250) 751-3103
	Environmental Protection Division	Nanaimo, BC V9T 6J9	Website:
			http://www.gov.bc.ca/env



FILE COPY

Date: March 31, 2014

File: PR-8405

REGISTERED MAIL

Jack Reynolds
Western Forest Products Ltd.
Nootka Sound Operations
PO Box 220
Gold River BC V0P 1G0

Dear Mr. Reynolds:

RE: Notice of Non-Compliance and Warning

Thank you for your time and assistance during the inspection conducted on July 25, 2013 of Western Forest Products Inc.'s landfill facility located at Head Bay in between Gold River and Tahsis, BC. It was determined that Western Forest Products Inc. is currently out of compliance with the following sections of Permit PR-8405:

- Section 4* There were no apparent surface water diversionary works or firebreaks in place. A portion of the landfill has been closed for some time that has never been capped, has reached capacity, but there is no closure plan, therefore it is uncertain whether or not site restoration has taken place in a satisfactory manner at the landfill.
- Section 5* There was not an adequate fireguard maintained at the open burning location.

Please find the attached inspection report for detailed findings. In order to bring Western Forest Products Inc. into full compliance with Permit PR-8405, the following actions and information are required by June 30, 2014:

- Section 4* Establish adequate surface water diversionary works and firebreaks for the landfill. Photographs of the works in place should be submitted.

.../2

Have a qualified professional prepare a closure plan for the landfill site for approval of the Director. The closure plan should be submitted to the Director no later than June 30, 2014. The closure plan must:

- (a) specify the final design elevation of the landfill,
- (b) specify the area of the landfill,
- (c) identify the measures to be taken to prevent, or minimize the risk of,
 - (i) leachate or waste escaping from the landfill,
 - (ii) erosion of the landfill cover,
 - (iii) fire occurring in the closed landfill or its cover, or
 - (iv) water running onto the closed landfill, and
- (d) identify maximum periods following the final discharge of waste before the implementation of the closure plan is initiated, and
- (e) describe the final cover of the landfill;
- (f) estimate the total volume of solid waste discharged to the landfill;
- (g) include a survey of the location of the landfill, prepared by a land surveyor admitted as a land surveyor under the *Land Surveyors Act*;
- (h) describe how the operator of the landfill facility has managed
 - (i) drainage restoration,
 - (ii) soil replacement,
 - (iii) the slope of the final cover,
 - (iv) erosion control, and
 - (v) re-vegetation and conditioning of the site;
- (i) describe how the operator of the landfill facility will monitor the site of the landfill facility.

Section 5 Establish an adequate fireguard at the open burning location. Photographs of the site once work is completed should be submitted.

It was also noted that compliance could not be determined with Section 1.1.1 of Permit PR-8405. In order to determine compliance with these sections, please submit the following information by June 30, 2014:

Section 1.1.1 The rate of discharge of waste to the landfill operation, including method of calculation.

You are warned that failure to comply with the terms and conditions of a Permit is an offence under the *Environmental Management Act* and the discharger may be subject to prosecution or other enforcement action.

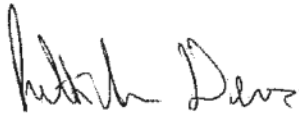
Jack Reynolds
Western Forest Products Ltd.
Nootka Sound Operations

- 3 -

March 31, 2014

If you have any questions or concerns please don't hesitate to contact me at 250 751-3187 or RuthAnn.Devos@gov.bc.ca.

Yours truly,



Ruth-Ann Devos
Environmental Protection Officer

DEVOS/jlk
\\Tarpon\S40133\EnvProtection_Share\General\Administration\SAVE\2014\March\8405
Warning letter March 31, 2014.docx

cc: Sergeant, Mike Newton – North Island District, BC Parks & Conservation Officer
Service Division Mike.Newton@gov.bc.ca

Maddalena Di Iorio Dunn – Compliance and Enforcement Supervisor, Forests Lands and
Natural Resource Operations Maddalena.DiiorioDunn@gov.bc.ca

Attachment: Inspection Record and photographs



Ministry of Environment
Inspection Record

**Environmental
Protection
Division**

EP System: <u>AMS</u>	Inspection Status: <u>FINAL</u>	
System Number: 8405	Inspection No: <u>17305</u>	
EP System Status: <u>Active</u>	Inspection Date: 2013-07-25	
Region: <u>West Coast</u>	Office: <u>Nanaimo</u>	
Trigger: <u>Planned</u>	Incidents of Non-Compliance Observed: <u>Yes</u>	
Non-Compliance Decision Matrix Level: <u>Level 2</u>	Non-Compliance Decision Matrix Category: <u>Category B</u>	
Inspector Name(s): Ruth-Ann Devos		Risk Ranking: <u>1 to 2 = Medium</u>
Audit:	Total Non-Compliance(s): <u>2</u>	
Regulated Party: Western Forest Products Inc.		
Regulated Party Contact(s): Jack Reynolds and Bruce Creelman		
Mailing Address: Nootka Sound Operations PO Box 220 Gold River BC V0P 1G0		
Phone No: 250-283-2833	Fax No:	
Contact Email: jreynolds@westernforest.com		
Location Description or Site Address: The landfill facility and open burning operation in Head Bay between Gold River and Tahsis.		
Latitude: 49.7924	N	Longitude: 126.4909 W
Receiving Environment(s): <u>Land Based</u>		

Summary

MONITORING AND REPORTING REQUIREMENTS	
Inspection Period: From: 2013-07-25 To: 2013-07-25	
Requirement Source: <u>Permit</u>	
Activity: <u>On Site</u>	Waste Type: <u>Refuse</u>
Inspection Summary: There were no apparent surface water diversionary works or firebreaks at the landfill and a portion of the landfill has been closed for some time but has not been capped. There is not an adequate firebreak around the open burning site.	Response: <u>Warning</u>

Compliance Summary	In	Out	N/A	N/D
Discharge	3	0	0	1
Operations	1	2	0	0

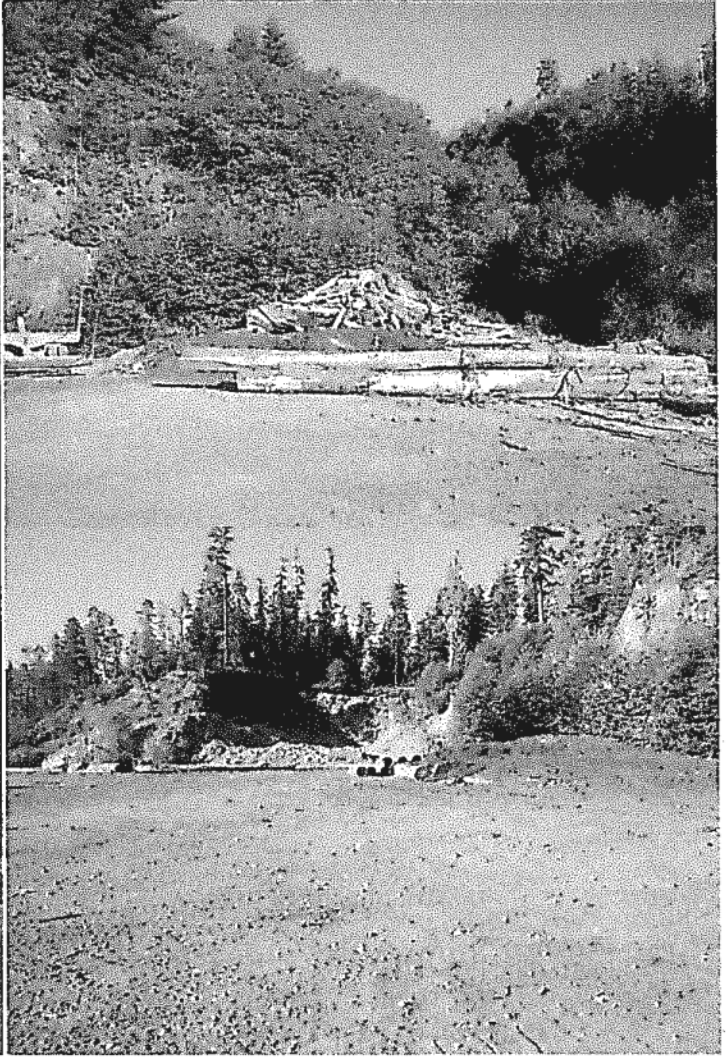
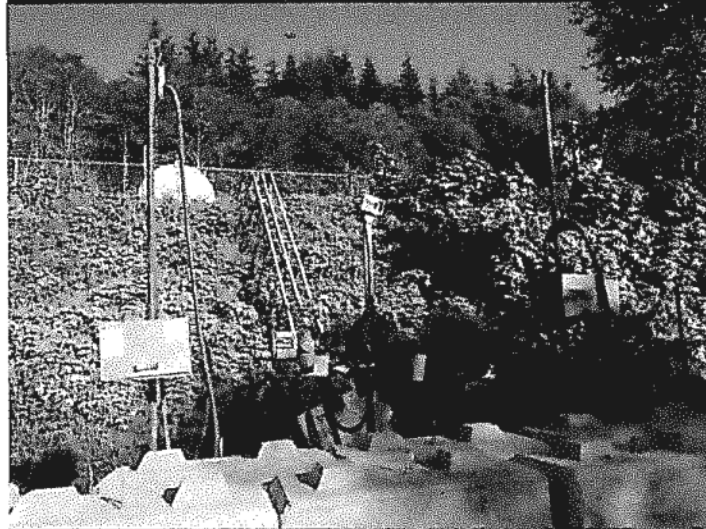
Inspection Details

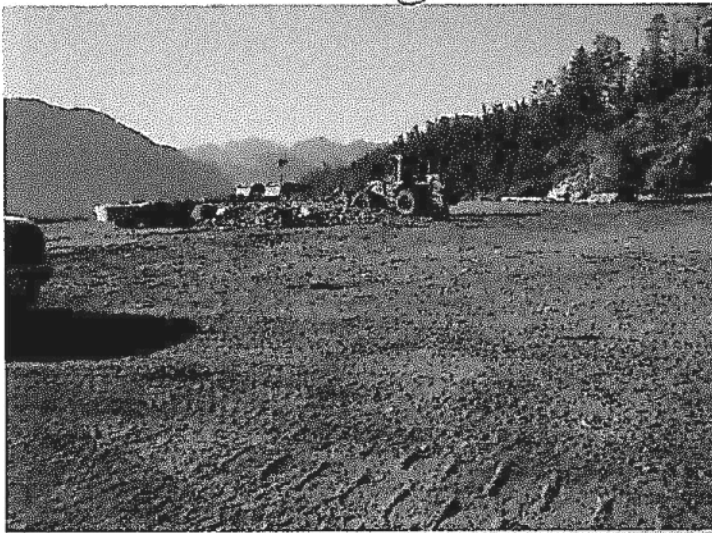
Requirement Type:	Requirement Description:	Details/Findings:	Compliance:
<u>Discharge</u>	1.1.1 The maximum authorized rate at which refuse may be discharged is 2000 m3/year.	The current discharge rate was not known at the time of the inspection. The estimated annual discharge rate should be submitted.	<u>Not Determined</u>
<u>Discharge</u>	1.1.3 The components of the refuse which may be discharged are wood waste, inert material and residue of combustion from the open burning of wood waste.	Only wood waste was evident in the landfill.	<u>In</u>
<u>Discharge</u>	1.1.4 The authorized works are a landfill, as directed, located approximately as shown on attached Appendix A-1.	The landfill is located as shown on Appendix A-1.	<u>In</u>
<u>Discharge</u>	1.2.2 The authorized works are a controlled open burning operation utilizing a forced air system as directed, approximately located as shown on attached Appendix A-1.	The open burning operation was located in accordance with Appendix A-1 A. Mr. Creelman informed that when the site is operating, a forced air system is brought in for use during open burning.	<u>In</u>
<u>Operations</u>	3 The permittee shall maintain the landfills authorized in Subsection 1.1 as Level B operations in accordance with the Pollution Control Objectives for The Forest Products Industry of BC with the exception that intermediate covering is not required at this time. Specific operating instruction may be issued by the Regional Waste Manager.	The landfill has been operated in accordance with this section.	<u>In</u>
<u>Operations</u>	4 Provision of fencing, site access, vehicle safety barriers, surface water diversionary works, firebreaks and site restoration as required, shall be carried out to the satisfaction of the	Due to the remoteness of the site it is not felt that fencing or vehicle safety barriers are required. There were no surface water diversionary works or firebreaks in place. There is a	<u>Out</u>

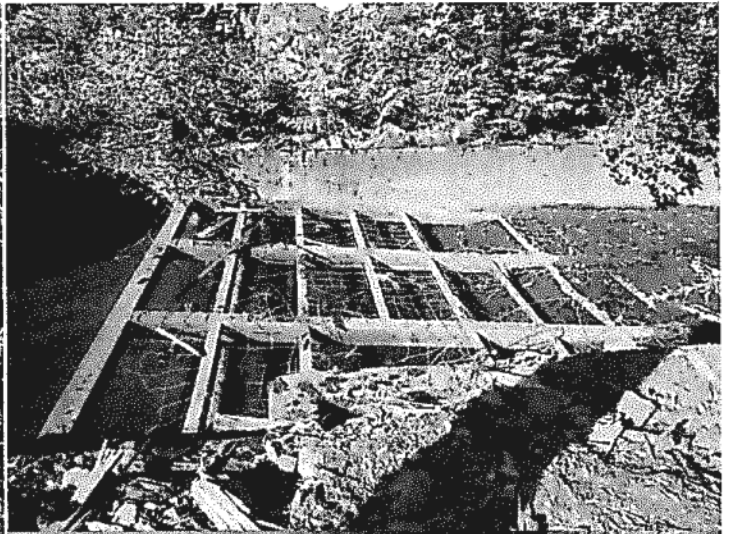
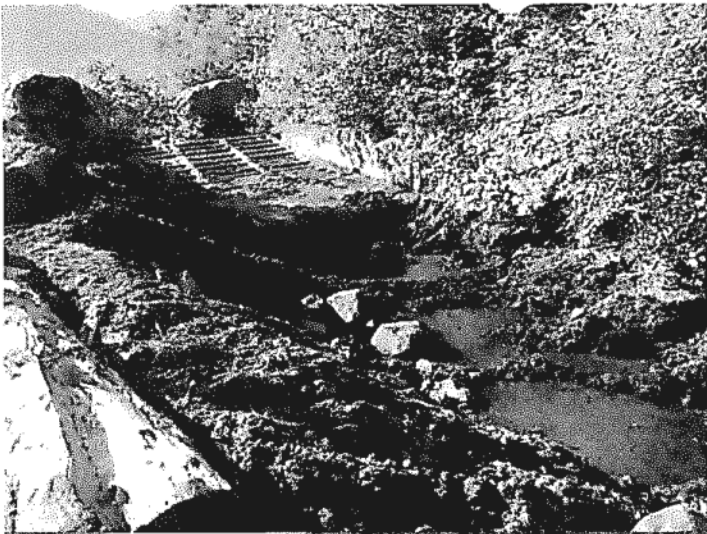
	Regional Waste Manager.	portion of the landfill that has been closed for some time with well-established alders growing on it that has never been capped.	
<u>Operations</u>	<p>5 The burning operation shall be restricted to a site designated as a burning area by the Regional Waste Manager.</p> <p>Burnable wastes shall be segregated from non-combustible materials and only readily burnable material originating from the dryland log sorting operation shall be open-burned. No waste shall be burned which is unacceptable to the Regional Waste Manager.</p> <p>The burning frequency is a maximum of twice per month. Each burn shall comprise one continuous period necessary to reduce the wood waste to ashes, but shall not exceed five days in duration.</p> <p>Burning shall take place only when an attendant is on duty and when conditions promote rapid combustion and dispersion of combustion products. No burning shall take place during periods of fire hazard or when burning is prohibited by other government agencies.</p> <p>Suitable approved devices shall be available for extinguishing fires to prevent them from surrounding areas. A fireguard shall be cleared and maintained free of combustible materials.</p>	<p>Mr. Creelman informed that the burning operation is carried out as specified in the permit.</p> <p>There was not an adequate fireguard maintained, as alders were growing too close to the burn site.</p>	<u>Out</u>

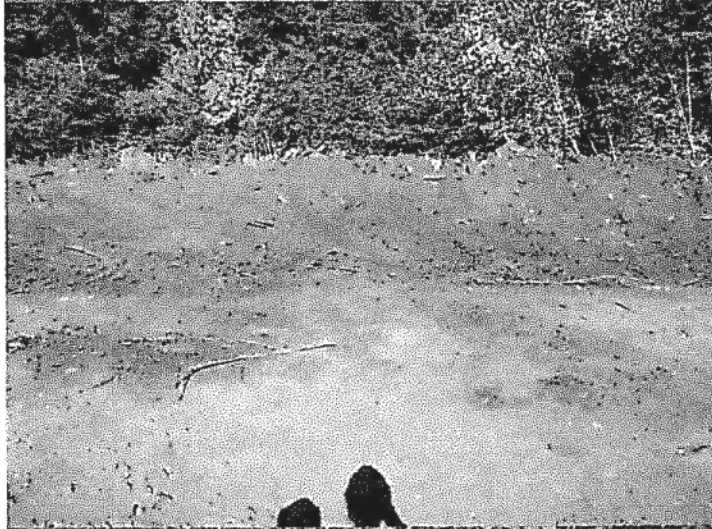
<i>ACTIONS REQUIRED BY REGULATED PARTY and/or ADDITIONAL COMMENTS:</i>	
Please see warning letter for required actions.	
<i>INSPECTION CONDUCTED BY:</i>	
<i>Signature</i> Ruth-Ann Devos	<i>Date Signed</i> : 2014-04-01
<i>ENCLOSURE(S) TO REGULATED PARTY & DESCRIPTION:</i>	
<u>CVIS Archives</u>	
<i>REGULATORY CONSIDERATIONS:</i>	

Ministry of Environment	West Coast Region Environmental Protection Division	Mailing Address: 2080-A Labieux Rd Nanaimo, BC V9T 6J9	Phone: (250) 751-3100 Fax: (250) 751-3103 Website: http://www.gov.bc.ca/env
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FILE COPY

March 31, 2014

File: PR-8663

REGISTERED MAIL

Jack Reynolds
Western Forest Products Ltd.
Nootka Sound Operations
PO Box 220
Gold River BC V0P 1G0

Dear Mr. Reynolds:

RE: Notice of Inspection

Thank you for your time and assistance during the inspection conducted on July 25, 2013 of Western Forest Products Inc.'s landfill facility located at Nesook Bay in between Gold River and Tahsis, BC. It was determined that Western Forest Products Inc. is currently in compliance with the requirements of Permit PR-8663. Please find the attached inspection report for detailed findings.

It was noted that compliance could not be determined with Sections 1.1.1 and 4 of Permit PR-8663. In order to determine compliance with these sections, please submit the following information by April 30, 2014:

- Section 1.1.1* The rate of discharge of waste to the landfill operation, including method of calculation.
- Section 4* The distance between the landfill and the drainage channel on the east side of the landfill as well as a topographic map showing the landfill location, drainage channel, surface water diversionary works and direction of runoff flow.

If you have any questions or concerns please don't hesitate to contact me at 250 751-3187 or RuthAnn.Devos@gov.bc.ca.

Yours truly,

Ruth-Ann Devos
Environmental Protection Officer
DEVOS/jlk

\\Tarpon\S40133\EnvProtection_Share\General\Administration\SAVE\2014\April\8663 Notice of Inspection letter March 31, 2014.docx

Attachment: Inspection Record and photographs



Ministry of Environment
Inspection Record

**Environmental
Protection
Division**

EP System: <u>AMS</u>	Inspection Status: <u>FINAL</u>	
System Number: 8663	Inspection No: <u>17273</u>	
EP System Status: <u>Active</u>	Inspection Date: 2013-07-24	
Region: <u>West Coast</u>	Office: <u>Nanaimo</u>	
Trigger: <u>Planned</u>	Incidents of Non-Compliance Observed: <u>No</u>	
Non-Compliance Decision Matrix Level: <u>Level 0</u>	Non-Compliance Decision Matrix Category: <u>Category 0</u>	
Inspector Name(s): Ruth-Ann Devos		Risk Ranking: <u>1 to 2 = Medium</u>
Audit:	Total Non-Compliance(s): <u>0</u>	
Regulated Party: Western Forest Products Inc.		
Regulated Party Contact(s): Jack Reynolds and Bruce Creelman		
Mailing Address: Nootka Sound Operations PO Box 220 Gold River BC V0P 1G0		
Phone No: 250-283-2833		Fax No:
Contact Email: jreynolds@westernforest.com		
Location Description or Site Address: The landfill facility is located in Nesook Bay in Nootka Sound.		
Latitude: 49.756	N	Longitude: 126.4202 W
Receiving Environment(s): <u>Land Based</u>		

Summary

MONITORING AND REPORTING REQUIREMENTS	
Inspection Period: From: 2013-07-24 To: 2013-07-24	
Requirement Source: <u>Permit</u>	
Activity: <u>On Site</u>	Waste Type: <u>Refuse</u>
Inspection Summary: Although there were no incidents of non-compliance observed, it was noted that compliance with Sections 1.1.1 and 4 could not be determined and more information is required.	Response: <u>Notice</u>

Compliance Summary	In	Out	N/A	N/D
Discharge	3	0	0	1
Operations	3	0	0	1

Inspection Details

Requirement Type:	Requirement Description:	Details/Findings:	Compliance:
<u>Discharge</u>	1.1.1 The maximum authorized rate of discharge is 4,000 m3/year.	The current discharge rate was not known at the time of the inspection. The estimated annual discharge rate should be submitted.	<u>Not Determined</u>
<u>Discharge</u>	1.1.3 The components of the refuse which may be discharged are wood waste, inert material and residue of combustion from the open burning of wood waste.	Only wood waste was evident in the landfill.	<u>In</u>
<u>Discharge</u>	1.1.4 The authorized works are a landfill as directed, located approximately as shown on attached Appendix A-1.	The landfill is located approximately as shown on attached Appendix A-1.	<u>In</u>
<u>Discharge</u>	1.2.1 The authorized works are a controlled open burning operation utilizing a forced air system as directed, approximately located as shown on attached Appendix A-1.	The open burning operation was located as shown on attached Appendix A-1. Mr. Creelman informed that a forced air system is brought in and utilized when the site is operational.	<u>In</u>
<u>Operations</u>	3 The permittee shall maintain the landfills authorized in Subsection 1.1 as Level B operations in accordance with the Pollution Control Objectives for The Forest Products Industry of BC with the exception that intermediate covering is not required at this time. Specific operating instruction may be issued by the Regional Waste Manager.	The landfill is maintained as a level B operation and intermediate cover is applied.	<u>In</u>
<u>Operations</u>	4 Provision of fencing, site access, vehicle safety barriers, surface water diversionary works, firebreaks and site restoration as required, shall be carried out to the satisfaction of the	Due to the remoteness of the site it is not felt that fencing or vehicle safety barriers are required. The surface of the landfill is graded towards the west, and there is surface water	<u>Not Determined</u>

	<p>Regional Waste Manager.</p> <p>The Permittee shall maintain a 20 m buffer strip along the drainage channel on the east side of the landfill site authorized in Section 1.1.</p>	<p>diversionary works along the south and north sides directing runoff to a depression and then forested area off the northwest corner of the landfill. The east end of the landfill is very close to the drainage channel and it could not be confirmed whether the 20 m buffer strip was maintained or whether the surface water diversionary works in place were adequate to manage runoff in an appropriate manner.</p>	
<u>Operations</u>	<p>5 The permittee is encouraged to segregate for recycling and reuse, where possible, materials destined for disposal at this site.</p>	<p>Metals are segregated for recycling when the site is operational.</p>	<u>In</u>
<u>Operations</u>	<p>6 The burning operation shall be restricted to a site designated as a burning area by the Regional Waste Manager.</p> <p>Burnable wastes shall be segregated from non-combustible materials and only readily burnable material originating from the dryland log sort operation shall be open-burned. No waste shall be burned which is unacceptable to the Regional Waste Manager.</p> <p>The maximum burning frequency twice per month. Each burn shall comprise one continuous period necessary to reduce the wood waste to ashes, but shall not exceed five days in duration.</p> <p>Burning shall take place only when an attendant is on duty and when conditions promote rapid</p>	<p>Mr. Creelman informed that when the site is operational, the burning will occur as stipulated in this section.</p>	<u>In</u>

	<p>combustion and dispersion of combustion products. No burning shall take place during periods of fire hazard or when burning is prohibited by other government agencies.</p> <p>Suitable approved devices shall be available for extinguishing fires to prevent them from surrounding areas. A fireguard shall be cleared and maintained free of combustible materials.</p>		
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ACTIONS REQUIRED BY REGULATED PARTY and/or ADDITIONAL COMMENTS:

See attached notice for required actions.

INSPECTION CONDUCTED BY:

Signature

Ruth-Ann Devos

Date Signed

:

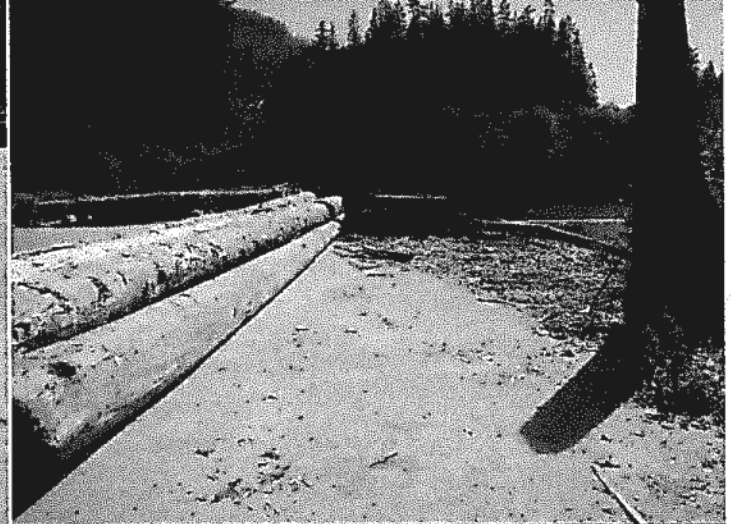
2014-03-31

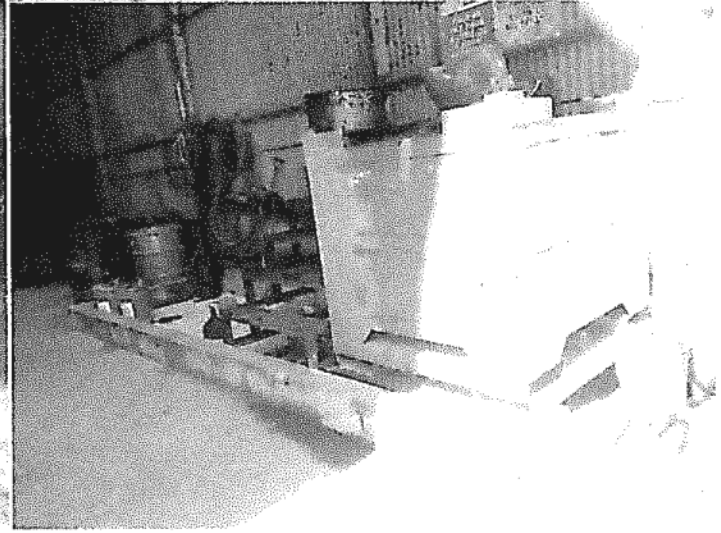
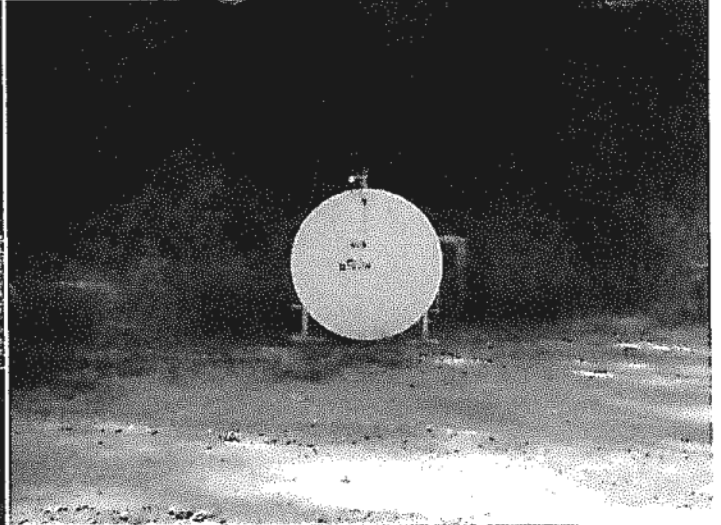
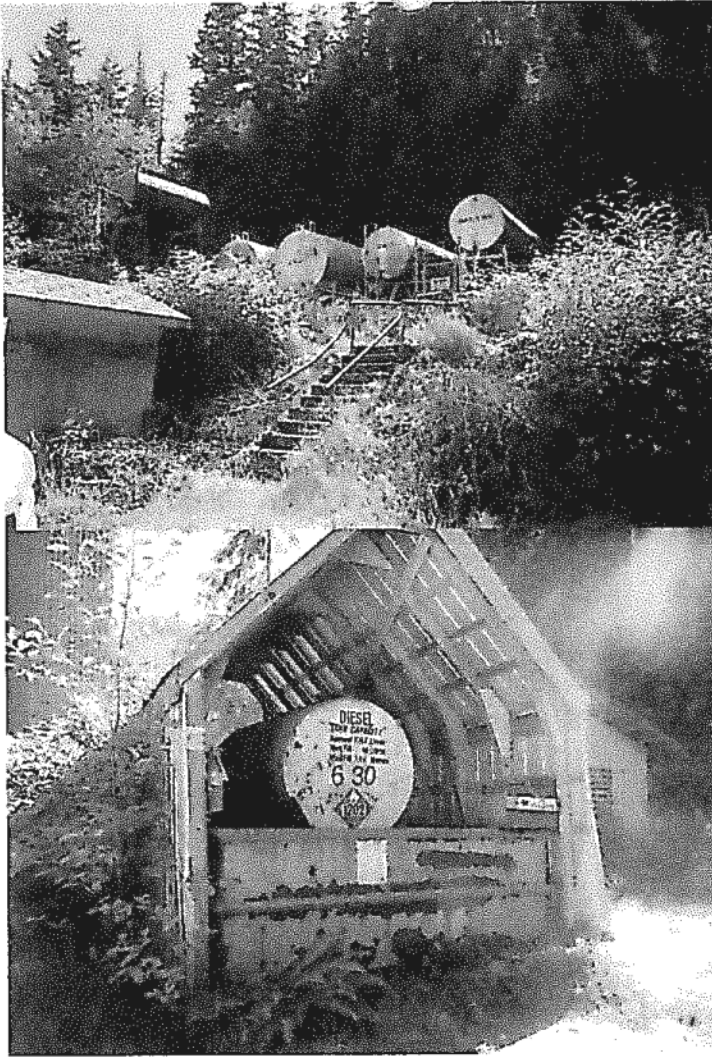
ENCLOSURE(S) TO REGULATED PARTY & DESCRIPTION:

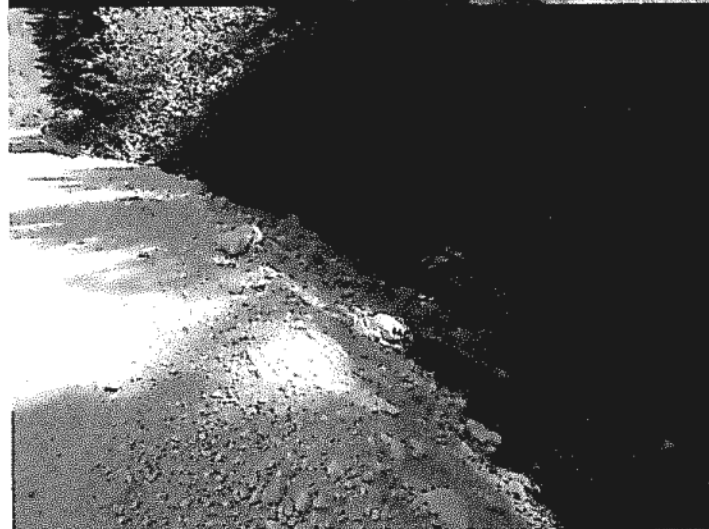
CVIS Archives

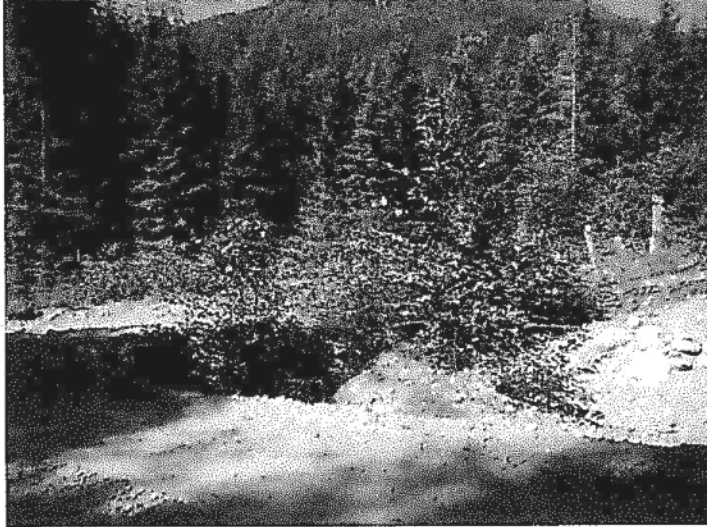
REGULATORY CONSIDERATIONS:

Ministry of Environment	West Coast Region Environmental Protection Division	Mailing Address: 2080-A Labieux Rd Nanaimo, BC V9T 6J9	Phone: (250) 751-3100 Fax: (250) 751-3103 Website: http://www.gov.bc.ca/env
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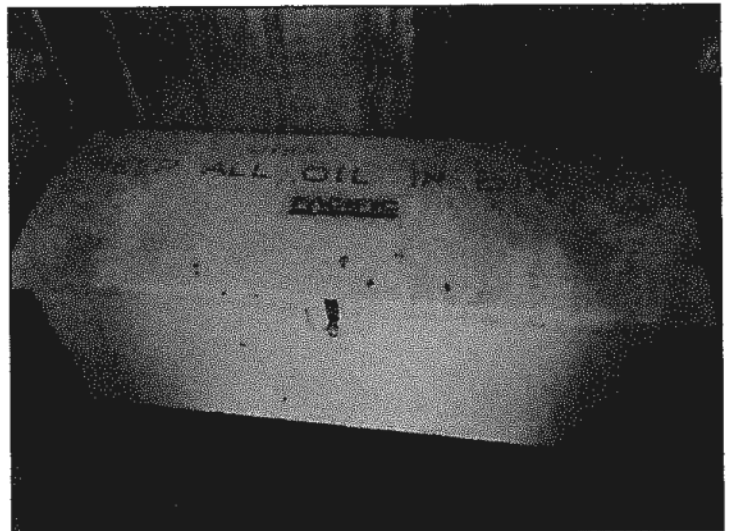
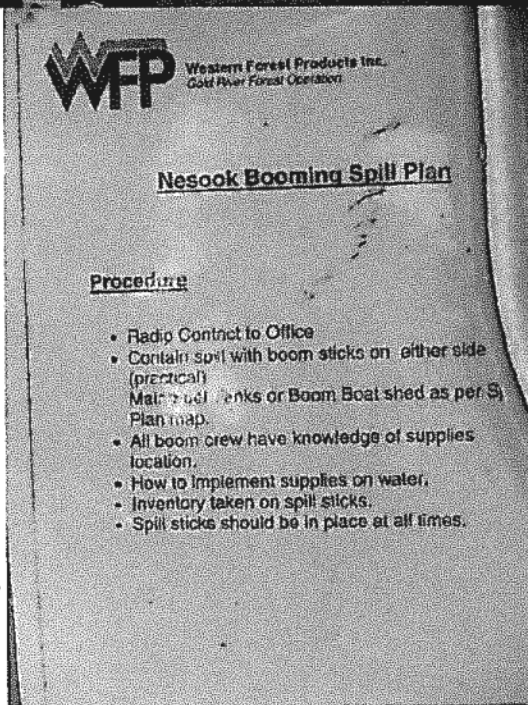
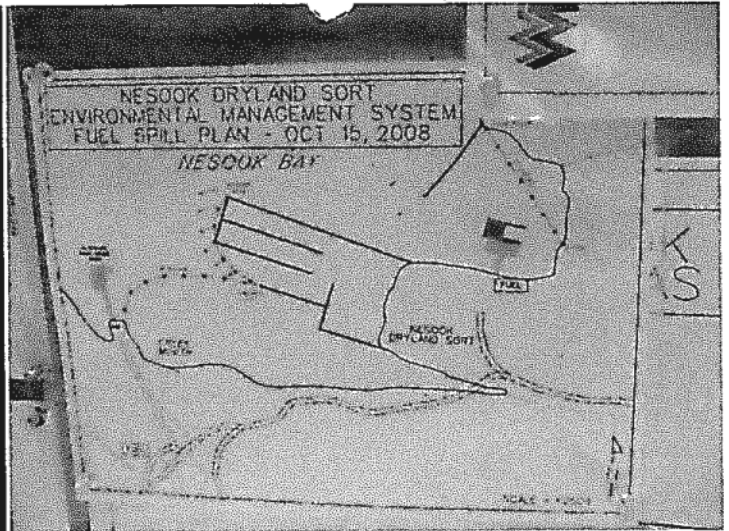














Date: March 31, 2014

File: PR-8405

REGISTERED MAIL

Jack Reynolds
Western Forest Products Ltd.
Nootka Sound Operations
PO Box 220
Gold River BC V0P 1G0

Dear Mr. Reynolds:

RE: Notice of Non-Compliance and Warning

Thank you for your time and assistance during the inspection conducted on July 25, 2013 of Western Forest Products Inc.'s landfill facility located at Head Bay in between Gold River and Tahsis, BC. It was determined that Western Forest Products Inc. is currently out of compliance with the following sections of Permit PR-8405:

- Section 4* There were no apparent surface water diversionary works or firebreaks in place. A portion of the landfill has been closed for some time that has never been capped, has reached capacity, but there is no closure plan, therefore it is uncertain whether or not site restoration has taken place in a satisfactory manner at the landfill.
- Section 5* There was not an adequate fireguard maintained at the open burning location.

Please find the attached inspection report for detailed findings. In order to bring Western Forest Products Inc. into full compliance with Permit PR-8405, the following actions and information are required by June 30, 2014:

- Section 4* Establish adequate surface water diversionary works and firebreaks for the landfill. Photographs of the works in place should be submitted.

.../2

Have a qualified professional prepare a closure plan for the landfill site for approval of the Director. The closure plan should be submitted to the Director no later than June 30, 2014. The closure plan must:

- (a) specify the final design elevation of the landfill,
- (b) specify the area of the landfill,
- (c) identify the measures to be taken to prevent, or minimize the risk of,
 - (i) leachate or waste escaping from the landfill,
 - (ii) erosion of the landfill cover,
 - (iii) fire occurring in the closed landfill or its cover, or
 - (iv) water running onto the closed landfill, and
- (d) identify maximum periods following the final discharge of waste before the implementation of the closure plan is initiated, and
- (e) describe the final cover of the landfill;
- (f) estimate the total volume of solid waste discharged to the landfill;
- (g) include a survey of the location of the landfill, prepared by a land surveyor admitted as a land surveyor under the *Land Surveyors Act*;
- (h) describe how the operator of the landfill facility has managed
 - (i) drainage restoration,
 - (ii) soil replacement,
 - (iii) the slope of the final cover,
 - (iv) erosion control, and
 - (v) re-vegetation and conditioning of the site;
- (i) describe how the operator of the landfill facility will monitor the site of the landfill facility.

Section 5 Establish an adequate fireguard at the open burning location. Photographs of the site once work is completed should be submitted.

It was also noted that compliance could not be determined with Section 1.1.1 of Permit PR-8405. In order to determine compliance with these sections, please submit the following information by June 30, 2014:

Section 1.1.1 The rate of discharge of waste to the landfill operation, including method of calculation.

You are warned that failure to comply with the terms and conditions of a Permit is an offence under the *Environmental Management Act* and the discharger may be subject to prosecution or other enforcement action.

.../3

Jack Reynolds
Western Forest Products Ltd.
Nootka Sound Operations

- 3 -

March 31, 2014

If you have any questions or concerns please don't hesitate to contact me at 250 751-3187 or RuthAnn.Devos@gov.bc.ca.

Yours truly,



Ruth-Ann Devos
Environmental Protection Officer

cc: Sergeant, Mike Newton – North Island District, BC Parks & Conservation Officer
Service Division Mike.Newton@gov.bc.ca

Maddalena Di Iorio Dunn – Compliance and Enforcement Supervisor, Forests Lands and
Natural Resource Operations Maddalena.DiiorioDunn@gov.bc.ca

Attachment: Inspection Record and photographs



Ministry of Environment Inspection Record

**Environmental
Protection
Division**

EP System: <u>AMS</u>		Inspection Status: <u>FINAL</u>	
System Number: <u>15037</u>		Inspection No: <u>17310</u>	
EP System Status: <u>Active</u>		Inspection Date: <u>2013-07-09</u>	
Region: <u>West Coast</u>		Office: <u>Nanaimo</u>	
Trigger: <u>Planned</u>		Incidents of Non-Compliance Observed: <u>Yes</u>	
Non-Compliance Decision Matrix Level: <u>Level 2</u>		Non-Compliance Decision Matrix Category: <u>Category B</u>	
Inspector Name(s): <u>Ruth-Ann Devos</u>		Risk Ranking: <u>1 to 2 = Medium</u>	
Audit: <u></u>		Total Non-Compliance(s): <u>1</u>	
Regulated Party: <u>WFP Western Lumber Ltd.</u>			
Regulated Party Contact(s): <u>Jack Reynolds</u>			
Mailing Address: <u>WFP Western Lumber Ltd.</u> <u>c/o Western Forest Products Inc.</u> <u>Gold River Forest Operation</u> <u>PO Box 220, Gold River, BC V0P 1G0</u>			
Phone No: <u>250-283-2833</u>		Fax No: <u></u>	
Contact Email: <u></u>			
Location Description or Site Address: <u>The landfill facility is located at Blowhole Bay on the east side of Nootka Island, BC.</u>			
Latitude: <u>49.828313</u> <u>N</u>		Longitude: <u>126.676211</u> <u>W</u>	
Receiving Environment(s): <u>Land Based</u>			

Summary

MONITORING AND REPORTING REQUIREMENTS	
Inspection Period: From: 2013-07-26 To: 2013-07-26	
Requirement Source: <u>Permit</u>	
Activity: <u>On Site</u>	Waste Type: <u>Refuse</u>
Inspection Summary: There were no surface water diversionary works or firebreaks in place at the landfill site. It could not be determined if there was an adequate buffer between the landfill and the south slope.	Response: <u>Warning</u>

Compliance Summary	In	Out	N/A	N/D
Discharge	5	0	0	0
Operations	2	1	0	1

Inspection Details

Requirement Type:	Requirement Description:	Details/Findings:	Compliance:
<u>Discharge</u>	1.1.1 The maximum authorized rate of discharge is 2000 m ³ /year.	The site was not operational at the time of inspection nor had been for some time.	<u>In</u>
<u>Discharge</u>	1.1.2 The components of the refuse which may be discharged are wood waste, mineral soil, logging camp incinerator ash, non-recyclable metallic waste and the residue of combustion from the open burning of wood waste.	Only wood waste and mineral soil were seen at the landfill.	<u>In</u>

<u>Discharge</u>	1.1.3 The authorized works a landfill operation as directed, located approximately as shown on attached Site Plan A.	The landfill facility is located as shown on attached Site Plan A.	<u>In</u>
<u>Discharge</u>	1.2.1 The maximum authorized volume of wood waste which may be burned is 2500 m3/year.	The site was not operational at the time of inspection nor had been for some time.	<u>In</u>
<u>Discharge</u>	1.2.2 The authorized works are a controlled open burning operation as directed utilizing a forced air system, approximately located as shown on attached Site Plan A.	The open burning operation was located in accordance with Site Plan A.	<u>In</u>
<u>Operations</u>	<p>2.1 The permittee shall maintain the landfills authorized in Subsection 1.1 as Level B operations in accordance with the Pollution Control Objectives for The Forest Products Industry of BC with the exception that intermediate covering of wood waste, residue of combustion from the open burning of wood waste and mineral soil is not required at this time. Logging camp incinerator ash shall be covered with suitable material once every 40 operating days and at least once every 2 months. Metallic refuse shall be placed in an area separated from the wood waste and covered with suitable material once every 40 operating days and at least once every 2 months. Specific operating instruction may be issued by the Regional Waste Manager.</p> <p>No refuse shall be placed within 15 m buffer as shown on attached Site Plan A.</p>	The site was quite overgrown and as such it could not be determined whether the 15 m buffer, as shown on attached Site Plan A, has been maintained.	<u>Not Determined</u>

<u>Operations</u>	2.2 Provision of fencing, site access, vehicle safety barriers, surface water diversionary works, firebreaks and site restoration as required, shall be carried out to the satisfaction of the Regional Waste Manager.	<p>Due to the remoteness of the site it is not felt that fencing or vehicle safety barriers are required.</p> <p>There were no apparent surface water diversionary works or firebreaks in place.</p>	<u>Out</u>
<u>Operations</u>	2.3 The permittee is encouraged to segregate for recycling and reuse, where possible, materials destined for disposal at this site.	The site was not operating at the time of visit, but Mr. Creelman informed that metals are segregated for recycling.	<u>In</u>

<p><u>Operations</u></p>	<p>2.4 The burning operation shall be restricted to a site designated as a burning area by the Regional Waste Manager.</p> <p>Burnable wastes shall be segregated from non-combustible materials and only readily burnable material originating from the dryland log sort operation shall be open-burned. No waste shall be burned which is unacceptable to the Regional Waste Manager.</p> <p>The burning frequency is twice per year and there shall be no burning during the period from July 1 to September 30 annually. Each burn shall comprise one continuous period necessary to reduce the wood waste to ashes, but shall not exceed five days in duration.</p> <p>Burning shall take place only when an attendant is on duty and when conditions promote rapid combustion and dispersion of combustion products. No burning shall take place during periods of fire hazard or when burning is prohibited by other government agencies.</p> <p>Suitable approved devices shall be available for extinguishing fires to prevent them from surrounding areas. A fireguard shall be cleared and maintained free of combustible materials.</p>	<p>Mr. Creelman informed that when operational, contractors are required to carry out the burning as specified in the permit.</p>	<p><u>In</u></p>
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ACTIONS REQUIRED BY REGULATED PARTY and/or ADDITIONAL COMMENTS:

Please see warning letter for required actions.

INSPECTION CONDUCTED BY:

Signature

Date Signed

Ruth-Ann Devos

2014-04-15

ENCLOSURE(S) TO REGULATED PARTY & DESCRIPTION:

CVIS Archives

REGULATORY CONSIDERATIONS:

Ministry of
Environment

West Coast
Region Environmental
Protection Division

Mailing Address:

2080- A Labieux Rd
Nanaimo, BC V9T 6J9

Phone: (250) 751-3100

Fax: (250) 751-3103

Website:

<http://www.gov.bc.ca/env>



FILE COPY

Date: April 22, 2014

File: PR-15037

REGISTERED MAIL

Jack Reynolds
Western Forest Products Ltd.
Nootka Sound Operations
PO Box 220
Gold River BC V0P 1G0

Dear Mr. Reynolds:

RE: Notice of Non-Compliance and Warning

Thank you for your time and assistance during the inspection conducted on July 26, 2013 of Western Forest Products Inc.'s landfill facility located at Blowhole Bay on the east side of Nootka Island, BC. It was determined that Western Forest Products Inc. is currently out of compliance with the following sections of Permit PR-15037:

Section 2.2 There were no apparent surface water diversionary works or firebreaks in place.

Please find the attached inspection report for detailed findings. In order to bring Western Forest Products Inc. into full compliance with Permit PR-15037, the following actions and information are required by June 30, 2014:

Section 4 Establish adequate surface water diversionary works and firebreaks for the landfill. Photographs of the works in place should be submitted.

It was also noted that compliance could not be determined with Section 2.1 of Permit PR-15037. In order to determine compliance with these sections, please submit the following information by June 30, 2014:

Section 2.1 A map showing the landfill footprint in relation to the required 15 m buffer.

You are warned that failure to comply with the terms and conditions of a Permit is an offence under the *Environmental Management Act* and the discharger may be subject to prosecution or other enforcement action.

.../2

Jack Reynolds
Western Forest Products Ltd.
Nootka Sound Operations

- 2 -

April 22, 2014

Some environmental stewardship issues were noted. Environmental stewardship issues are those that require attention to ensure better protection of the environment and should be followed up with a report back to the Director outlining the steps and schedule of actions taken to resolve the environmental stewardship issues by May 31, 2014.

- A closure plan should be submitted for approval for the permitted disposal site to ensure that future site restoration will be conducted to the satisfaction of the Regional Director.

If you have any questions or concerns please don't hesitate to contact me at 250 751-3187 or RuthAnn.Devos@gov.bc.ca.

Yours truly,



Ruth-Ann Devos
Environmental Protection Officer

DEVOS/jlk
\\Tarpon\S40133\EnvProtection_Share\General\Administration\SAVE\2014\April\15037
Warning letter April 14, 2014.docx

Attachment: Inspection Record and photographs

cc: Sergeant, Mike Newton – North Island District, BC Parks & Conservation Officer
Service Division Mike.Newton@gov.bc.ca

Maddalena Di Iorio Dunn – Compliance and Enforcement Supervisor, Forests Lands and
Natural Resource Operations Maddalena.DiiorioDunn@gov.bc.ca



Ministry of Environment
Inspection Record

Environmental
Protection
Division

EP System: <u>AMS</u>	Inspection Status: <u>FINAL</u>	
System Number: 15037	Inspection No: <u>17310</u>	
EP System Status: <u>Active</u>	Inspection Date: 2013-07-09	
Region: <u>West Coast</u>	Office: <u>Nanaimo</u>	
Trigger: <u>Planned</u>	Incidents of Non-Compliance Observed: <u>Yes</u>	
Non-Compliance Decision Matrix Level: <u>Level 2</u>	Non-Compliance Decision Matrix Category: <u>Category B</u>	
Inspector Name(s): Ruth-Ann Devos		Risk Ranking: <u>1 to 2 = Medium</u>
Audit:	Total Non-Compliance(s): <u>1</u>	
Regulated Party: WFP Western Lumber Ltd.		
Regulated Party Contact(s): Jack Reynolds and Bruce Creelman		
Mailing Address: WFP Western Lumber Ltd. c/o Western Forest Products Inc. Gold River Forest Operation PO Box 220, Gold River, BC V0P 1G0		
Phone No: 250-283-2833	Fax No:	
Contact Email:		
Location Description or Site Address: The landfill facility is located at Blowhole Bay on the east side of Nootka Island, BC.		
Latitude: 49.828313	N	Longitude: 126.676211 W
Receiving Environment(s): <u>Land Based</u>		

Summary

MONITORING AND REPORTING REQUIREMENTS	
Inspection Period: From: 2013-07-26 To: 2013-07-26	
Requirement Source: <u>Permit</u>	
Activity: <u>On Site</u>	Waste Type: <u>Refuse</u>
Inspection Summary: There were no surface water diversionary works or firebreaks in place at the landfill site. It could not be determined if there was an adequate buffer between the landfill and the south slope.	Response: <u>Warning</u>

Compliance Summary	In	Out	N/A	N/D
Discharge	5	0	0	0
Operations	2	1	0	1

Inspection Details

Requirement Type:	Requirement Description:	Details/Findings:	Compliance:
<u>Discharge</u>	1.1.1 The maximum authorized rate of discharge is 2000 m3/year.	The site was not operational at the time of inspection nor had been for some time.	<u>In</u>
<u>Discharge</u>	1.1.2 The components of the refuse which may be discharged are wood waste, mineral soil, logging camp incinerator ash, non-recyclable metallic waste and the residue of combustion from the open burning of wood waste.	Only wood waste and mineral soil were seen at the landfill.	<u>In</u>
<u>Discharge</u>	1.1.3 The authorized works a landfill operation as directed, located approximately as shown on attached Site Plan A.	The landfill facility is located as shown on attached Site Plan A.	<u>In</u>
<u>Discharge</u>	1.2.1 The maximum authorized volume of wood waste which may be burned is 2500 m3/year.	The site was not operational at the time of inspection nor had been for some time.	<u>In</u>
<u>Discharge</u>	1.2.2 The authorized works are a controlled open burning operation as directed utilizing a forced air system, approximately located as shown on attached Site Plan A.	The open burning operation was located in accordance with Site Plan A.	<u>In</u>
<u>Operations</u>	2.1 The permittee shall maintain the landfills authorized in Subsection 1.1 as Level B operations in accordance with the Pollution Control Objectives for The Forest Products Industry of BC with the exception that intermediate covering of wood waste, residue of combustion from the open burning of wood waste and mineral soil is not required at this time. Logging camp incinerator	The site was quite overgrown and as such it could not be determined whether the 15 m buffer, as shown on attached Site Plan A, has been maintained.	<u>Not Determined</u>

	<p>ash shall be covered with suitable material once every 40 operating days and at least once every 2 months. Metallic refuse shall be placed in an area separated from the wood waste and covered with suitable material once every 40 operating days and at least once every 2 months. Specific operating instruction may be issued by the Regional Waste Manager.</p> <p>No refuse shall be placed within 15 m buffer as shown on attached Site Plan A.</p>		
<u>Operations</u>	<p>2.2 Provision of fencing, site access, vehicle safety barriers, surface water diversionary works, firebreaks and site restoration as required, shall be carried out to the satisfaction of the Regional Waste Manager.</p>	<p>Due to the remoteness of the site it is not felt that fencing or vehicle safety barriers are required.</p> <p>There were no apparent surface water diversionary works or firebreaks in place.</p>	<u>Out</u>
<u>Operations</u>	<p>2.3 The permittee is encouraged to segregate for recycling and reuse, where possible, materials destined for disposal at this site.</p>	<p>The site was not operating at the time of visit, but Mr. Creelman informed that metals are segregated for recycling.</p>	<u>In</u>
<u>Operations</u>	<p>2.4 The burning operation shall be restricted to a site designated as a burning area by the Regional Waste Manager.</p> <p>Burnable wastes shall be segregated from non-combustible materials and only readily burnable material originating from the dryland log sort operation shall be open-burned. No waste shall be burned which is unacceptable to the Regional Waste Manager.</p>	<p>Mr. Creelman informed that when operational, contractors are required to carry out the burning as specified in the permit.</p>	<u>In</u>

	<p>The burning frequency is twice per year and there shall be no burning during the period from July 1 to September 30 annually. Each burn shall comprise one continuous period necessary to reduce the wood waste to ashes, but shall not exceed five days in duration.</p> <p>Burning shall take place only when an attendant is on duty and when conditions promote rapid combustion and dispersion of combustion products. No burning shall take place during periods of fire hazard or when burning is prohibited by other government agencies.</p> <p>Suitable approved devices shall be available for extinguishing fires to prevent them from surrounding areas. A fireguard shall be cleared and maintained free of combustible materials.</p>	
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ACTIONS REQUIRED BY REGULATED PARTY and/or ADDITIONAL COMMENTS:

Please see warning letter for required actions.

INSPECTION CONDUCTED BY:

Signature

Ruth-Ann Devos

Date Signed

:

2014-04-15

ENCLOSURE(S) TO REGULATED PARTY & DESCRIPTION:

CVIS Archives

REGULATORY CONSIDERATIONS:

Ministry of
Environment

West Coast
Region Environmental

Mailing Address:
2080-A Labieux Rd

Phone: (250) 751-3100
Fax: (250) 751-3103











Ministry of Environment Inspection Record

**Environmental
Protection
Division**

Inspection Number: 17465		Inspection Status: FINAL	
EP System: <u>AMS</u>		Inspection Date: 2013-07-25	
EP System Number: 5430		EP System Status: <u>Active</u>	
Region:		Office:	
Trigger: <u>Planned</u>		Incidents of Non-Compliance Observed: <u>Yes</u>	
Non-Compliance Decision Matrix Level: <u>Level 2</u>		Non-Compliance Decision Matrix Category: <u>Category B</u>	
Inspector Name(s): Ruth-Ann Devos		CPIX: <u>1 to 2 = Medium</u>	
Audit:		Total Non-Compliance(s): 1	
Regulated Party: Western Forest Products Inc.			
Regulated Party Contact(s): Jack Reynolds and Bruce Creelman			
Legal Address: Nootka Sound Operations PO Box 220 Gold River BC V0P 1G0			
Phone No: 250-283-2833		Fax No:	
Contact Email: jreynolds@westernforest.com			
Location Description or Site Address: The landfill facility and open burning operation is located near Tsowwin River, Tahsis Inlet, BC.			
Latitude: 49.7734 N		Longitude: 126.6347 W	
Receiving Environment(s): <u>Land Based</u>			

Summary

MONITORING AND REPORTING REQUIREMENTS	
Inspection Period: From: 2013-07-25 To: 2013-07-25	
Requirement Source: Permit	
Activity: <u>On Site</u>	Waste Type: <u>Refuse</u>
Inspection Summary: There were no apparent surface water diversionary works or firebreaks in place.	Response: <u>Warning</u>
ACTIONS REQUIRED BY REGULATED PARTY: Please see warning letter for required actions.	
ADDITIONAL COMMENTS:	

Compliance Summary	In	Out	N/A	N/D
Discharge	5	0	0	0
Operations	3	1	0	0

Inspection Details

Requirement Type: <u>Discharge</u>
Requirement Description: 1.1.1 The maximum authorized rate of discharge is 1500 m3/year.
Details/Findings: The site has not been in operation the last couple of years. As such, there were no discharges to the authorized landfill.

Compliance: <u>In</u>
Requirement Type: <u>Discharge</u>
Requirement Description: 1.1.2 The components of the refuse which may be discharged are wood waste, mineral soil, non-recyclable multi-strand log bundle wire, logging camp incinerator ash and the residue of combustion from the open burning of wood waste.
Details/Findings: Only wood waste was evident in the landfill.
Compliance: <u>In</u>
Requirement Type: <u>Discharge</u>
Requirement Description: 1.1.3 The authorized works are a landfill operation as directed, located approximately as shown on attached Site Plan A.
Details/Findings: The landfill is located as shown on Site Plan A.
Compliance: <u>In</u>
Requirement Type: <u>Discharge</u>
Requirement Description: 1.2.1 The maximum authorized volume of wood waste which may be burned is 2,500 m ³ /year.
Details/Findings: The site has not been in operation the last couple of years. As such, there has been no open burning of wood waste.
Compliance: <u>In</u>
Requirement Type: <u>Discharge</u>
Requirement Description: 1.2.2 The authorized works are a controlled open burning operation utilizing a forced air system, approximately located as shown on attached Site Plan A.
Details/Findings: The open burning operation was located in accordance with Site Plan A. Mr. Creelman informed that when the site is operating, a forced air system is brought in for use during open burning.
Compliance: <u>In</u>
Requirement Type: <u>Operations</u>
Requirement Description: 2.1 The permittee shall maintain the landfill authorized in Subsection 1.1 as a Level B operation in accordance with the Pollution Control Objectives for The Forest Products Industry of BC with the exception that intermediate covering of wood waste, residue of combustion from the open burning of wood waste and mineral soil is not required at this time. Logging camp incinerator ash shall be covered with suitable cover material once every 40 operating days and at least once every 2 months. The metallic component of refuse shall be segregated, placed in an area of the landfill separated from the wood waste and covered with suitable material once every 40 operating days and at least once every 2 months. Additional specific operating instruction may be issued by the Regional Waste Manager.
Details/Findings: Intermediate cover has been applied.

It was noted during the inspection that a road was being built on top of a portion of the landfill. It is assumed that this has been done under the direction of a suitably qualified professional and that any potential environmental impacts or fire hazards of this change in landfill design are taken into account. Please be aware that it is expected that this is also taken into account during the closure phase of the landfill.

Compliance: In

Requirement Type: Operations

Requirement Description:

2.2 Provision of fencing, site access, vehicle safety barriers, surface water diversionary works, firebreaks and site restoration as required, shall be carried out to the satisfaction of the Regional Waste Manager.

Details/Findings:

Due to the remoteness of the site it is not felt that fencing or vehicle safety barriers are required.

There were no apparent surface water diversionary works or firebreaks in place.

Compliance: Out

Requirement Type: Operations

Requirement Description:

2.3 The permittee is encouraged to segregate for recycling and reuse, where possible, materials destined for disposal at this site.

Details/Findings:

Metals were segregated for recycling.

Compliance: In

Requirement Type: Operations

Requirement Description:

2.4 The burning operation shall be restricted to a site designated as a burning area by the Regional Waste Manager.

Combustible wastes shall be segregated from non-combustible materials and only readily burnable material originating from the dryland log sorting operation shall be open-burned. No waste shall be burned which is unacceptable to the Regional Waste Manager.

The burning frequency is a maximum of twice per month and there shall be no burning during the period from July 1 to September 30 annually. Each burn shall comprise one continuous period necessary to reduce the wood waste to ashes, but shall not exceed five days in duration.

Burning shall take place only when an attendant is on duty and when conditions promote rapid combustion and dispersion of combustion products. No burning shall take place during periods of fire hazard or when burning is prohibited by other government agencies. The Regional Waste Manager may require that open burning cease during periods of adverse meteorological conditions.

Suitable approved devices shall be available for extinguishing fires to prevent them from surrounding areas. A fireguard shall be cleared and maintained free of combustible materials.

Details/Findings:

Mr. Creelman informed that when the site is operational, the burning operation is carried out as specified in the permit.

Compliance: In

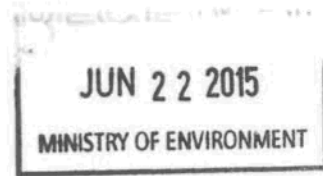
Were the following collected during inspection:		
Samples? <input type="checkbox"/>	Photos? <input type="checkbox"/>	EMS Number <input type="text"/>
Other (please specify) <input type="text"/>		
Is the Inspection related to an EA Project? <input type="checkbox"/>	EA Project Certificate Number: <input type="text"/>	

INSPECTION CONDUCTED BY:	
<i>Signature</i> Ruth-Ann Devos	<i>Date Signed</i> 2014-04-28
ENCLOSURE(S) TO REGULATED PARTY & DESCRIPTION: <input type="text"/>	
<u>CVIS Archives</u>	
REGULATORY CONSIDERATIONS: <input type="text"/>	
DISCLAIMER:	
<p>Please note that sections of the permit, regulation or code of practice referenced in this inspection record are for guidance and are not the official version. Please refer to the original permit, regulation or code of practice.</p> <p>To see the most up to date version of regulations and codes of practices please visit: http://www.bclaws.ca/</p> <p>If you require a copy of the original permit, please contact the inspector noted on this inspection record or visit: http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publicly%20Viewable%20Authorizations</p> <p>It is also important to note that this inspection record does not necessarily reflect each requirement or condition of the authorization therefore compliance is noted only for the requirements or conditions listed in the inspection record.</p>	

Ministry of Environment	BLANK	Mailing Address:	Phone: (250) 751-3100
	Region	2080-A Labieux Rd	Fax: (250) 751-3103
	Environmental Protection Division	Nanaimo, BC V9T 6J9	Website:
			http://www.gov.bc.ca/env



WESTERN FOREST PRODUCTS INC
Nootka Forest Operation



File #: PR-5430

June 17, 2015

Regional Waste Manager
Ministry of Environment – West Coast Region
2080-A Labieux Rd.
Nanaimo, BC
V9T 6J9

Attention: Katherine Pearce, Ruth-Ann Devos

Re: 2013 Site Inspection, Waste Permit PR-5430, Tsowwin River DLS and Waste Site

This letter is in response to your Notice of Non-Compliance and Warning letter dated April 25, 2014 regarding the July 2013 Site Inspection of PR-5430 at Tsowwin River. As described below, WFP has met permit requirements, and is in compliance with waste permit PR-5430.

Non Compliance Issues:

Regarding Section 2.2 – Surface water diversionary works:

- 1) At the dryland sort, there is no direct surface water input to the sort area, and no creek in the immediate vicinity of the sort area. Ditchlines are established where required to capture drainage directed off the surface of the sort, although it should be noted that the amount of shotrock on the sort surface prevents pooling that is common on other non-paved sorts.
- 2) The Tsowwin landfill site is located on an elevated portion of land that slopes away from the landfill on two of four sides (north-east and south-west sides). The landfill is isolated from input of surface water on the South east side by Spur T-5, which is effective in draining water away from the site to the north. The north-west side of the landfill site is located against a very small knob less than 0.5ha in size. Surface water from this small slope is limited, and a small rock ditchline (created by the elevation in the rock-lined side of the landfill) is effective in diverting any surface drainage away from the landfill site.

There are no streams in the immediate vicinity of the waste site. Diversionary works currently in place are effective in eliminating surface flow to the site, thus no further works are required to bring the site into compliance with the permit.

Environmental Stewardship Issues:

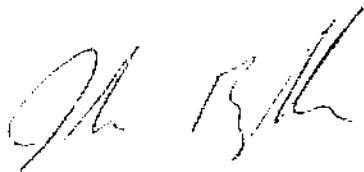
The environmental stewardship issues you have noted, have been dealt with during 2014 and Winter 2015 operations at Tsowwin River. Specifically of note:

- 1) The dryland sort surface was cleaned and patch ballasted prior to use in 2014 to ensure no pooling of water, and to ensure surface water drains correctly to the ditch areas. The ditches have been cleaned to allow for proper runoff of surface water.
- 2) The old debris piles have been burned/removed from the dryland sort area as recommended in your April 25, 2014 letter.
- 3) The accumulations of small woody debris and bark around the pushoff has been pulled back from the skidway and bunk areas and disposed of as recommended in your April 25, 2014 letter.
- 4) You have requested a closure plan for the landfill site associated with PR-5430 at Tsowwin River. The permit does not specify a requirement for a closure plan, and Section 15 of the *Code of Practice for Industrial Non-Hazardous Waste Landfills Incidental to the Wood Processing Industry* is specific in requiring a Final Closure Plan at least 3 months before the intended closure of a landfill facility. We do not plan to close the PR-5430 landfill within the next three months. While we recognize that a conceptual

closure plan can aid in the design and best management of a landfill, we are not aware of special circumstances that would require the submission of a closure plan earlier than specified in the *Code of Practice*. In the case of PR-5430, we are comfortable that the landfill meets the design elements and construction considerations required for proper waste site management, to provide many years of use into the future, and proper mitigation of potential environmental risks. Furthermore, we anticipate limited operations over the next few years, which will result in little to no use of the sort of landfill site.

As per the above, all outstanding items have been dealt with, and I consider WFP to be in full compliance with Waste Permit PR-5430 at Tsowwin River. Please do not hesitate to contact me if you have any further questions at (250) 283-2833, or via e-mail at jreynolds@westernforest.com

Yours truly,
Western Forest Products Inc.
Nootka Forest Operation

A handwritten signature in black ink, appearing to read 'J. Reynolds', is written over a horizontal line.

Jack Reynolds, RPF
Operations Engineer

From: [Bruce Vinnedge](#)
To: [Kurinka, Travis ENV:EX](#)
Subject: PR 7492
Date: Thursday, September 7, 2017 1:52:53 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)

An action item has been created to ensure that proper signage is in place for the West Tahsis landfill site. Due this year.

Bruce Vinnedge, RPF
Area Planner

Tel 250.287.5061 Cell 250.202.8340
BVinnedge@westernforest.com

westernforest.com



NOTICE OF CONFIDENTIAL TRANSMISSION. This message and any accompanying attachments are intended only for the intended recipient named above and may contain information that is privileged and confidential and protected by copyright. Any dissemination, distribution, copying or action taken in reliance on this email or any accompanying attachments by anyone other than the intended recipient is prohibited. If you are not the intended recipient, please notify us of the error in communication by telephone (604-648-4500) or by return e-mail and destroy all copies of this communication and any accompanying attachments without using or disclosing them. Thank you.



Report Date: October 05, 2017

File: 17343

Report Number: 068837

WESTERN FOREST PRODUCTS INC.

3RD FLOOR
435 TRUNK ROAD DUNCAN
BC V9L 2P9

Dear WESTERN FOREST PRODUCTS INC.

Re: Notice Letter, Permit 17343, Western Forest Products Inc. - Brodick Creek - Dry Land Log Sort, Refuse

On August 02, 2017, Ministry of Environment, Environmental Protection Division staff conducted an inspection of your facility, WESTERN FOREST PRODUCTS INC. located at Western Forest Products Inc. - Brodick Creek - Dry Land Log Sort with authorization number 17343 under the *Environmental Management Act*. Ministry staff were accompanied on site by Bruce Vinnedge, Western Forest Products Inc..

Inspection Details:

Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.1: This subsection applies to the discharge of refuse from a DRYLAND LOG SORTING OPERATION. The site reference number for this discharge is E256014. 1.1.1 The maximum authorised rate of discharge is 500 cubic meters per year.
Details/Findings:	On August 2, 2017, Ministry of Environment and Climate Change Strategy (MoE) Environmental Protection Officer Travis Kurinka conducted an on-site inspection of Western Forest Products Inc. (WFP) for compliance with refuse permit #PR17343 authorised under the Environmental Management Act (EMA). Officer Kurinka was accompanied on-site by WFP staff Will Sloan (Certification Coordinator) and Bruce Vinnedge (Area Planner). Mr. Vinnedge, informed Officer Kurinka that the landfill has not been operational during the inspection period (January 1, 2016 to August 2, 2017).
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.2: This subsection applies to the discharge of refuse from a DRYLAND LOG SORTING OPERATION. The site reference number for this discharge is E256014. 1.1.2 The components of the refuse which may be discharged are wood wastes, mineral soil, residue of combustion from the open burning of wood waste and metallic waste from maintenance shop.
Details/Findings:	Officer Kurinka observed wood wastes and mineral soil discharged into the landfill at the time of the inspection.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.3: This subsection applies to the discharge of refuse from a DRYLAND LOG SORTING OPERATION. The site reference number for this discharge is E256014. 1.1.3 The authorised works are landfill operations as directed and related appurtenances approximately located as shown on attached Site Plan A.

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Details/Findings:	Officer Kurinka observed the authorised landfill as directed and related appurtenances approximately located as shown on attached Site Plan A.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.4: This subsection applies to the discharge of refuse from a DRYLAND LOG SORTING OPERATION. The site reference number for this discharge is E256014. 1.1.4 The authorised works must be complete and in operation when discharge commences.
Details/Findings:	Officer Kurinka observed the landfill to be in to be complete at the time of the inspection. The landfill was not in operation at the time of the inspection as WFP was not logging in the area.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.1 Landfill Operations 2.1: The permittee shall maintain the landfill authorised in Subsection 1.1 as a Level B operation in accordance with the Pollution Control Objectives for the Forest Products Industry of British Columbia, dated November 23, 1977 which, in normal conditions, requires that cover material be applied once every 20 operating days and at least once per month. The metallic component of the refuse shall be segregated, placed in an area of the landfill separated from the wood waste and covered with suitable material once every 20 operating days and at least once per month. Additional specific operating instructions may be issued by the Regional Waste Manager.
Details/Findings:	Mr. Sloan and Mr. Vinnedge, informed Officer Kurinka that the landfill is maintained as a Level B operation in accordance with the Pollution Control Objectives for the Forest Products Industry of British Columbia, dated November 23, 1977. Mr. Vinnedge, informed Officer Kurinka that the landfill was last covered when the landfill was operation, which was before the inspection period.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.2 Site Preparation and Restoration 2.2: Provision of fencing, site access, vehicle safety barriers, surface water diversionary works, firebreaks and site restoration as required, shall be carried out to the satisfaction of the Regional Waste Manager.
Details/Findings:	The landfill site is remote with boat or helicopter access. Officer Kurinka observed that WFP had erected a sign indicating the nature of the works. No site access, vehicle safety barriers, and surface water diversionary works were present at the time of the inspection.
Compliance:	In
Actions to be taken:	

Please be advised that this inspection report may be published on the provincial website within 7 days.

Compliance History:

This is the first electronic compliance record for this authorization, since January 1, 2012.

Please submit all annual/quarterly/monthly reports and data submissions to the Ministry's Routine Environmental Reporting Submission Mailbox at EnvAuthorizationsReporting@gov.bc.ca. More information about the reporting requirements may be found at <http://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/routine-environmental-reporting-submission-mailbox>.

If you have any questions about this letter, please contact the undersigned.

Yours truly,

Travis Kurinka

Environmental Protection Officer

cc:

Attachments:

Deliver via:

Email: ☒ Fax: ☐ Mail: ☐
Registered Mail: ☐ Hand Delivery: ☐

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<http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publically%20Viewable%20A%20uthorizations>

It is also important to note that this inspection record does not necessarily reflect each requirement or condition of the authorization therefore compliance is noted only for the requirements or conditions listed in the inspection record.



Report Date: October 05, 2017

File: 7492

Report Number: 068867

Western Forest Products Inc.
Gold River Forest Operation
PO Box 220, Gold River, BC V0P 1G0

Dear Western Forest Products Inc.

Re: Notice Letter, Permit 7492, Western Forest Products Inc. - Tahsis - West Tahsis Dry Land Log Sort, Refuse

On August 02, 2017, Ministry of Environment, Environmental Protection Division staff conducted an inspection of your facility, located at Tahsis - West Tahsis Dry Land Log Sort with authorization number 7492 under the *Environmental Management Act*. Ministry staff were accompanied on site by Bruce Vinnedge, Western Forest Products Inc.

Inspection Details:

Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.1: This section applies to the discharge of refuse from a DRYLAND LOG SORTING OPERATION. The site reference number for this discharge is E261657. The maximum authorized rate of discharge is 400 m3/a.
Details/Findings:	On August 2, 2017, Ministry of Environment and Climate Change Strategy (MoE) Environmental Protection Officer Travis Kurinka conducted an on-site inspection of Western Forest Products Inc. (WFP) for compliance with refuse permit #PR7492 authorised under the Environmental Management Act (EMA). Officer Kurinka was accompanied on-site by WFP staff Will Sloan (Certification Coordinator) and Bruce Vinnedge (Area Planner). Mr. Vinnedge, informed Officer Kurinka that WFP has not discharged refuse into the landfill during the inspection period.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.2: This section applies to the discharge of refuse from a DRYLAND LOG SORTING OPERATION. The site reference number for this discharge is E261657. 1.1.2 The components of refuse which may be discharged are wood waste, mineral soil and residue of combustion from the controlled open burning of wood waste.
Details/Findings:	During the on-site inspection, Officer Kurinka observed wood waste and mineral soil in the landfill. Mr. Vinnedge, informed Officer Kurinka that when WFP was discharging refuse into the landfill it originated from the dryland log sorting operation.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.3: This section applies to the discharge of refuse from a DRYLAND LOG SORTING OPERATION. The site reference number for this discharge is E261657. 1.1.3 The authorized works are a landfill operation as directed and related appurtenances, identified as Site 2 on the attached Site Plan A.

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Details/Findings:	Officer Kurinka observed the authorized landfill operation as directed and related appurtenances, identified as Site 2 on the attached Site Plan A.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.4: This section applies to the discharge of refuse from a DRYLAND LOG SORTING OPERATION. The site reference number for this discharge is E261657. 1.1.4 The authorized works must be completed and in operation on and from the date of this amended permit.
Details/Findings:	At the time of the inspection, Officer Kurinka observed the landfill to be complete, but not in operation due to WFP not logging in the area.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.1 Active Landfill Operation 2.1: The permittee shall maintain the landfill operations authorized in Section 1.1 as Level B operations in accordance with the Pollution Control Objectives for the Forest Products Industry of British Columbia, dated November 23, 1977, with the exception that refuse shall be placed in lifts no deeper than 3 metres after compaction and each lift shall be covered with suitable inert material. No refuse shall be placed into free standing water and/or within 1 meter of the highest groundwater table at the point of discharge. Additional specific operating instructions may be issued by the Director.
Details/Findings:	Mr. Vinnedge, informed Officer Kurinka that the WFP maintains the active landfill as a Level B operations in accordance with the Pollution Control Objectives for the Forest Products Industry of British Columbia, dated November 23, 1977. At the time of the inspection, Officer Kurinka did not observe any refuse in free standing water.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.1 Active Landfill Operation 2.1: The permittee shall maintain the landfill operations authorized in Section 1.1 as Level B operations in accordance with the Pollution Control Objectives for the Forest Products Industry of British Columbia, dated November 23, 1977, with the exception that refuse shall be placed in lifts no deeper than 3 metres after compaction and each lift shall be covered with suitable inert material. No refuse shall be placed into free standing water and/or within 1 meter of the highest groundwater table at the point of discharge. Additional specific operating instructions may be issued by the Director.
Details/Findings:	At the time of the inspection the landfill was heavily overgrown with alder. Due to this overgrowth Officer Kurinka was unable to determine the lift height. In addition, at the time of the inspection the level of the groundwater at the point of discharge was unknown. <u>Therefore, compliance could not be determined for these sections of the permit.</u>
Compliance:	Not Determined
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.5 Hazardous Waste 2.5: The discharge of any material determined to be a hazardous waste as defined by the Environmental Management Act Hazardous Waste Regulation is prohibited.
Details/Findings:	Officer Kurinka did not observe any refuse that would be defined as a hazardous waste by the Environmental Management Act Hazardous Waste Regulation.
Compliance:	In

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Actions to be taken:	
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If you have any questions about this letter, please contact the undersigned.

Yours truly,

Travis Kurinka

Environmental Protection Officer

cc:

Attachments:

Deliver via:			
Email:	<input checked="checked" type="checkbox"/>	Fax:	<input type="checkbox"/>
Registered Mail:	<input type="checkbox"/>	Hand Delivery:	<input type="checkbox"/>

Ministry of Environment	Compliance	Mailing Address:	Telephone: 250 751 3100
	Environmental	2080-A	Facsimile: 250 751 3103
	Protection Division	Labieux Rd	Website: www.gov.bc.ca/env
		Nanaimo BC V9E 6J9	

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<http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publically%20Viewable%20A>
[authorizations](http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publically%20Viewable%20A)

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