



Report Date: October 10, 2018

File: 107664

Report Number: 099541

CIF COMPOSITES INC.

1810 Verling Ave  
Saanichton BC V8M 1X6

Dear CIF COMPOSITES INC.

**Re: Non-compliance Advisory Letter, Permit 107664, 1810 Verling Ave, Saanichton BC V8M 1X6, Air**

On September 05, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an inspection of your facility, CIF COMPOSITES INC. located at 1810 Verling Ave, Saanichton BC V8M 1X6 with authorization number 107664 under the *Environmental Management Act*.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of CIF COMPOSITES INC., and will be taken into account in the event of future non-compliance.

Please note that this authorization is considered to be out of compliance until such a time as it can be confirmed to meet the authorization requirements.

**Inspection Details:**

Requirement Description:	<p><b>1.1 Authorized Discharge</b></p> <p>1.1.1: This section applies to the discharge of air from a GEL COAT BOOTH (S1). The site reference number for this discharge is E309906.</p> <p>The maximum rate of discharge is 300 cubic metres per minute.</p>
Details/Findings:	<p>On September 5, 2018, Ministry of Environment and Climate Change Strategy (Ministry) Officer Graham Wheating conducted an on-site inspection of CIF Composites Inc. (Facility) located in Saanichton, BC to verify compliance with PERMIT 107664 (Permit). Permit 107664 authorizes the discharge of contaminants to air from a fibreglass manufacturing plant. The permit was first issued on April 10, 2018 and has not been amended. Present during the inspection was Wayne Peters (Director, CIF Composites).</p> <p>During the inspection, Mr. Peters informed Officer Wheating that the facility is in the process of finding a suitable qualified professional to design and implement the required upgrades to the rooftop fan/vents as required by section 2.1.2. The deadline to meet the requirements of section 2.1.2 is December 31, 2019. Therefore compliance with sections 1.1 to 1.5 and their subsections is beyond the scope of the inspection their compliance status was not determined.</p>

Compliance:	Not Determined
Actions to be taken:	Ensure steps are being taken to meet the regulatory requirements of section 2.1.2 regarding the upgrading of the facility's rooftop fan/vents.
Requirement Description:	<p><b>1.6 Miscellaneous Sources</b></p> <p>1.6: This section applies to the discharge of air contaminants from miscellaneous sources within this facility. These sources include, but are not restricted to Delta Dust Extractors D1 and D2.</p> <p>The characteristics of the discharge must be typical emissions originating from building ventilation, fan vents, and stacks.</p> <p>These sources must be operated as per Part 2 Section 6 of the Environmental Management Act that prohibits the introduction of waste into the environment in such a manner or quantity as to cause pollution. The Director may require sampling or control measures at these sources at any time by specifying such requirements in writing to the permittee.</p>
Details/Findings:	<p>During the inspection, Officer Wheating observed the shop doors to the facility were open and fiberglass odours were present outside of the building.</p> <p>Mr. Peters informed Officer Wheating that the doors are left open during the hot summer months to improve the working conditions for staff. Although there were noticeable odours present outside the building, their composition could not be determined and compliance with this section could not be determined.</p>
Compliance:	Not Determined
Requirement Description:	<p><b>2.1 Authorized Works</b></p> <p>2.1: The authorized works for the discharges in Section 1 must be complete and in operation while discharging.</p> <p>The Permittee must inspect the authorized works and maintain them in good working order.</p>
Details/Findings:	<p>During the inspection, Mr. Peters informed Officer Wheating that the facilities current ventilation fans are used when equipment they ventilate is in operation.</p> <p>During the inspection, Mr. Peters produced an equipment maintenance log document for each of the facilities current ventilation fans (Photo 5).</p>

Compliance:	In
Requirement Description:	<b>2.1 Authorized Works</b> 2.1.1: The Permittee must ensure that inlet mesh screens are in place during operations, where required in Section 1.
Details/Findings:	During the inspection, Officer Wheating observed that some of the ventilation system inlets did not have mesh screens in place (Photos 1 to 4).
Compliance:	Out
Actions to be taken:	Ensure that all ventilation systems inlets have mesh screens in place during operation.
Requirement Description:	<b>2.1 Authorized Works</b> 2.1.2: The Permittee must upgrade the rooftop fan/vents authorized in Sections 1.4.4 and 1.5.4 by December 31, 2019. Installation of a new fan and vent must be capable of a discharge rate of 300 cubic metres per minute. Record of these upgrades must be submitted to the Director within 6-months of installation.
Details/Findings:	Although the deadline for the upgrades required by this section has not lapsed, Mr. Peters informed Officer Wheating that the facility is currently in the process contacting qualified professionals to make the required upgrades to the ventilation system.
Compliance:	Not Applicable
Requirement Description:	<b>2.2 Bypasses</b> 2.2: The permittee must not allow any discharge authorized by this authorization to bypass the authorized works, except with the prior written approval of the Director.
Details/Findings:	During the inspection, Mr. Peters informed Officer Wheating that the facility has not experienced any bypasses of the authorized works. Therefore, this section is not applicable at this time.

Compliance:	Not Applicable
Requirement Description:	<p><b>2.3 Emergency Procedures</b></p> <p>2.3: In the event of an emergency or condition beyond the control of the permittee, which prevents effective operation of the authorized works or leads to an unauthorized discharge, the permittee must:</p> <ul style="list-style-type: none"> <li>i. Comply with all applicable statutory requirements, including the Spill Reporting Regulation;</li> <li>ii. Take remedial action to restore the effective operation of the authorized works and to prevent any unauthorized discharges.</li> <li>iii. Immediately report the emergency or condition and the remedial action that has and will be taken to the RAPP line (1-877-952-7277, #7277 from mobile phone) or electronically at this link: <a href="http://www.env.gov.bc.ca/cos/rapp/form.html">http://www.env.gov.bc.ca/cos/rapp/form.html</a>.</li> </ul> <p>The Director may reduce or suspend operations to protect the environment during an emergency until the authorized works have been restored and/or corrective steps have been taken to prevent unauthorized discharges.</p>
Details/Findings:	During the inspection, Mr. Peters informed Officer Wheating that the facility has not experienced any emergency procedures. Therefore compliance with this section is not applicable.
Compliance:	Not Applicable
Requirement Description:	<p><b>2.5 Process Modification</b></p> <p>2.5: The Director must be notified prior to implementing changes to any process that may result in discharges exceeding the characteristics authorized under this permit.</p>
Details/Findings:	The facility is currently in the process of contacting qualified professionals to upgrade the ventilation system as required by section 2.1.2. As such these upgrades being done to meet the current requirements are not considered process modifications. Therefore, this section is not applicable at this time.
Compliance:	Not Applicable

Actions to be taken:	If, after the upgrades made to meet the section 2.1.2 requirements have been made, the facility intends to make further upgrades, they must notify a director prior to implementing the change.
Requirement Description:	<b>2.6 New Works</b> 2.6: Plans and specifications for new authorized works and upgrades to existing works must be submitted to the Director and their approval obtained before construction commences. Works must be constructed in accordance with approved plans.
Details/Findings:	During the inspection, Mr. Peters informed Officer Wheating that the facility in the process of finding an appropriate qualified professional. The plans for the upgrades to the existing works have not been completed and construction has not yet commenced. Therefore compliance with this section is not applicable at this time.
Compliance:	Not Applicable
Actions to be taken:	Ensure that the plans for the upgrades to the existing authorized works are provided to the Director prior to the commencement of construction.
Requirement Description:	<b>2.7 Future Upgrading of Works</b> 2.7: The Director may require the Permittee to repair, alter, remove, improve or add to existing works, or to construct new works, and to submit plans and specifications for works specified in this authorization.
Details/Findings:	This requirement regarding the future upgrades to works is beyond the scope of this inspection. Therefore compliance with this section is not applicable at this time.
Compliance:	Not Applicable

Requirement Description:	<b>2.8 Reduction of Fugitive Emissions</b> 2.8: Fugitive emissions created within the operation area must be suppressed.  The permittee must: <ul style="list-style-type: none"> <li>• Ensure that ventilation fans are operational during operating hours;</li> <li>• Refrain from storing waste and uncured materials containing styrene outside the plant building;</li> <li>• Keep the lids of all waste receptacles securely closed;</li> <li>• Provide storage for inventory of resins, gelcoats and cleaning solvents in tightly sealed containers and provide lids for working containers when not in actual use.</li> </ul>
Details/Findings:	<p>During the inspection, Officer Wheating observed that the facility stores waste and uncured materials indoors, and stores it's product inventory in tightly sealed containers in a sea container (Photo 6).</p> <p>Mr. Peters informed Officer Wheating that the facility does not keep the ventilation fans on continuously during operating hours, he explained that the fans are in operation when the equipment they service is in use. As the intent of this section is to ensure the ventilation fans are in use during operating hours, this section is found to be out of compliance.</p>
Compliance:	Out
Actions to be taken:	Ensure the ventilation fans are in operation during the facilities operating hours.
Requirement Description:	<b>2.9 Restriction of Air Mixing</b> 2.9: The use of air for mixing of resins or gel coats is prohibited except where required for specific process reasons.
Details/Findings:	During the inspection, Mr. Peters informed Officer Wheating that the facility uses air mixing at one of it's mixing stations. Whether air mixing was required for the specific process was not determined at the time of the inspection. Therefore, compliance with this section is not determined at this time.
Compliance:	Not Determined
Actions to be taken:	Ensure that the air mixing of resins or gel coats is only used for the specific processes that require it.

Requirement Description:	<b>3.1 Emissions Monitoring</b>  3.1: The permittee must complete a one-time flow rate stack test for all sources in Section 1 to demonstrate increased flow rates, targeting the maximum flow rate specified in the permit for each source. The results must be submitted to the Director within 1-year of installing the upgraded works required in Section 2.1.2.
Details/Findings:	This requirement is based upon the upgrades required by section 2.1.2 that are not required to be in place until December 31, 2019. Therefore, compliance with this section is not applicable at this time.
Compliance:	Not Applicable
Requirement Description:	<b>3.2 Future Monitoring</b>  3.2: The Director may require the Permittee to conduct monitoring, and may specify procedures for monitoring and analysis, and procedures or requirements respecting the handling, treatment, transportation, discharge or storage of waste.  The Director may amend any requirements under this section, including requiring increased or decreased monitoring based on data submitted by the Permittee and any other data gathered in connection with this authorization.
Details/Findings:	As this section refers to potential future monitoring requirements, it is beyond the scope of this inspection which focused on the current operation of the facility.
Compliance:	Not Applicable
Requirement Description:	<b>3.3 Future Impact Assessment</b>  3.3: The Director may require the Permittee to conduct studies and to report information in accordance with the specification of the Director.  The Director may amend any requirements under this section, including requiring increased or decreased reporting based on data submitted by the Permittee and any other data gathered in connection with this authorization.
Details/Findings:	As this section refers to future potential to carry out impact assessment, it is beyond the scope of this inspection which focused on the current operation of the facility.

Compliance:	Not Applicable
Requirement Description:	<b>3.4 Resin and Gelcoat Consumption Records</b> 3.4: The permittee must record and maintain monthly records of resin, spray adhesive, solvent and gelcoat consumption and make these available for inspection upon request.
Details/Findings:	During the inspection, Mr. Peters provided Officer Wheating with consumption records of products used at the facility (Photo 7).
Compliance:	In
Requirement Description:	<b>3.5 Maintenance Records</b> 3.5: The permittee must record and maintain monthly records of maintenance of the authorized works in Section 1 and make these available for inspection upon request. Records must be retained for 5-years.
Details/Findings:	During the inspection, Mr. Peters provided Officer Wheating with equipment maintenance logs of the authorized works in Section 1.
Compliance:	In



**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](mailto: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>

Authorization holders are required to submit reports of non-compliance to [EnvironmentalCompliance@gov.bc.ca](mailto:EnvironmentalCompliance@gov.bc.ca). This reporting requirement applies to any non-compliance with authorization conditions including, but not limited to; unauthorized bypasses, malfunctions, emergency conditions, permit exceedance and toxicity test failures. More information about the reporting requirements may be found at <https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/compliance-reporting-mailbox>

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

Below are attachments related to this inspection.

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

Yours truly,

Graham Wheating  
Environmental Protection Officer

cc:

**Attachments:**

1) 2018-09-05 IR99541 Photo Record Permit - 107664.pdf      Photo Record

**Deliver via:**

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

**Ministry of Environment  
and Climate Change  
Strategy**

Compliance  
Environmental  
Protection Division

Mailing Address:  
3rd Floor  
2975 Jutland Road  
Victoria BC V8W 9M1

Telephone: 250 387 3205  
Facsimile: 250 356 9836  
Website: [www.gov.bc.ca/env](http://www.gov.bc.ca/env)

**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 the 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.

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.

Photo 1.

Ventilation  
inlets with  
mesh screens in  
place.



Photo 2.

Ventilation inlet  
with mesh  
screen in place.



Photo 3.

Ventilation inlet  
without mesh  
screen in place.



Photo 4.

Ventilation inlet  
with mesh  
screens in  
place.



Photo 5.

## Equipment Maintenance Log.

[illegible]

Photo 6.

Product storage.



Authorization: 107664

Client Name: CIF Composites Inc.

NRIS IR#: 99541

(Date) Site Inspection Photos: 2018-09-05

Photo 7.

Product  
consumption  
records.

CONSUMPTION RECORD					
		Apr-18	May-18	Jun-18	Jul-18
DDM 9 MEK 50%		145.2 Kg	87.12 Kg	116.16 Kg	
DDM 30 MEK 30%				116.16 Kg	
LF 50 MEK 50%		203.28 Kg	87.12 Kg		
LF 30 MEK 30%					
68404 DCPD RESIN		4,840 Kg	3,520 Kg	1,100 Kg	
6631 ISO RESIN		900 Kg	2,250 Kg	450 Kg	
32334 ORTHO RESIN		2,700 Kg	225 Kg	675 Kg	
GP RESIN					
MISC. Resin					
AP 347 GELCOAT		245 Kg	245 Kg		
AP 348 GELCOAT		735 Kg	490 Kg		
PEBBLE GELCOAT		1,494 Kg	498 Kg	249 Kg	
GREEN GELCOAT					
MISC. GELCOAT					
ACETONE		1,134 Kg	1,134 Kg	324 Kg	
(For tool cleaning only)					

From: [COS South Island Zone ENV:EX](#)  
To: [ENV Environmental Complaints ENV:EX](#)  
Subject: 107664 95009 ERS 18-2425 s.22  
Date: July 27, 2018 10:05:46 AM

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From: ecc.ops3@pep.gov.bc.ca  
Sent: July-27-18 10:05:43 AM (UTC-08:00) Pacific Time (US & Canada)  
To: COS South Island Zone ENV:EX  
Subject: Notification of ERS 18-2425 - VICTORIA - SAANICH

Notification of ERS 18-2425 - VICTORIA - SAANICH

You can access the document at the following URL:

s.15

Enforcement Routing Sheet #18-2425  
Complaint Received By: SHANE (Operations 3 ECC)  
Date / Time received: 2018-07-27 9:58  
Area: SAANICH - VICTORIA - WEST COAST REGION  
COORS OR#:

#### CALLER INFORMATION

Caller Name: s.22  
Mail / Street Address / City: s.22  
Postal Code:  
Referred By:

#### CONTACT NUMBERS

Business s.22

#### VIOLATION DETAILS:

Violation Date: 2018-07-27  
Violation Time:  
Violation in Progress: No  
Violation Type: WASTE  
Offense Witnessed: Odour  
Offense Location: 1761 VERLING AVE, Saanichton, BC

s.22

## DESCRIPTION

Name (If known):

Sex:

Race:

Height:

Weight:

Eyes:

Hair:

Glasses:

Smoker:

Build:

Complexion:

Distinguishing Features:

Clothing:

Vehicle:

Weapons:

Other Details: