

2021-04-15 17787 Complaint NRIS pcbs in stormwater

From: ENV Environmental Complaints ENV:EX <EnvironmentalComplaints@gov.bc.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Cc: Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>
Sent: April 15, 2021 1:39:55 PM PDT
Attachments: image003.png, image005.png, image009.jpg, image010.jpg, image007.jpg, image004.png, image001.jpg, image002.gif

Hi Oana,

Complaint assigned to you. I'm unable to enter it in NRIS at the moment because I'm getting an error in the permit section. I'll assign it in NRIS once that's fixed.

Filed here:

P:\WANS\SHARE\ROB\25400-70 HWR\17787 Contech Mitchell Island HWR\09 Compliance

Best,

Kathryn Poole | a/Compliance Coordinator

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy

From: Environmental Compliance ENV:EX <environmentalcompliance@gov.bc.ca>
Sent: April 14, 2021 3:58 PM
To: ENV Environmental Complaints ENV:EX <EnvironmentalComplaints@gov.bc.ca>
Subject: 17787 Complaint NRIS pcbs in stormwater



Kathryn Poole | a/Compliance Coordinator

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on the TELUS Mobility Network or report the incident [online](#)

To report a spill call the Provincial Emergency Program at 1-800-663-3456

 @ComplianceBC More information about Environmental Compliance and how it is assessed can be found [here](#).

From: Mills, Warren <WMills@richmond.ca>
Sent: April 14, 2021 3:41 PM
To: Environmental Compliance ENV:EX <environmentalcompliance@gov.bc.ca>
Subject: FW: Site 3727 Richmond Steel

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Good afternoon,

Re: 11760 Mitchell Rd, Richmond, BC V6V 1V8

At this site, PCB contaminated with storm water has been identified by ECCC on permeable grounds near the Fraser River. This PCB contaminated stormwater has entered the Fraser River via the overland flow, and the operator has provided a remediation plan to address this issue. To date, the operator and their environmental consultant has not investigated groundwater at the site. There is a high likelihood that PCB contamination is present in groundwater and entering the Fraser River via groundwater migration.

The provincial land remediation branch has determined this would fall under Environmental Compliance's jurisdiction. Can you please call me to discuss?

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca

www.richmond.ca

From: Delaney, Colleen ENV:EX <Colleen.Delaney@gov.bc.ca>

Sent: January 27, 2021 1:46 PM

To: Mills, Warren <WMills@richmond.ca>

Subject: RE: Site 3727 Richmond Steel

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Hello Warren,

I have no further update beyond having been notified that Richmond Steel is under the jurisdiction of the Regional Operations Branch (ROB), since it is an operating site. I believe that David O'Malley in ROB David.OMalley@gov.bc.ca may be the more appropriate ENV representative for this meeting.

Regards,

Colleen

From: Mills, Warren <WMills@richmond.ca>

Sent: January 27, 2021 12:17 PM

To: Delaney, Colleen ENV:EX <Colleen.Delaney@gov.bc.ca>

Subject: RE: Site 3727 Richmond Steel

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Colleen,

Any update on this file? We are meeting with Environment Canada, Richmond Steel and their environmental consultant from PGL, next week to discuss the PCBs in stormwater.

Is a representative from MENV available to attend via webex on Thursday at 10am?

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

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www.richmond.ca

From: Mills, Warren

Sent: November 24, 2020 1:58 PM

To: 'Delaney, Colleen ENV:EX' <Colleen.Delaney@gov.bc.ca>

Subject: RE: Site 3727 Richmond Steel

Thanks Colleen.

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1



From: Delaney, Colleen ENV:EX [<mailto:Colleen.Delaney@gov.bc.ca>]
Sent: Tuesday, 24 November 2020 13:57
To: Mills, Warren
Subject: RE: Site 3727 Richmond Steel

Hi Warren,
Your original email was forwarded to the Land Remediation Management Team for discussion and a response. I have followed up with them on this and will notify you when I know more.
Regards,
Colleen

From: Mills, Warren <WMills@richmond.ca>
Sent: November 24, 2020 1:10 PM
To: Delaney, Colleen ENV:EX <Colleen.Delaney@gov.bc.ca>
Subject: RE: Site 3727 Richmond Steel

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Colleen,

I am just following up on this email.

Warren Mills, B.Sc., E.P., P.Ag.
Environmental Coordinator
6911 No. 3 Road, Richmond, BC V6Y 2C1
T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca
www.richmond.ca



From: Mills, Warren
Sent: Wednesday, 30 September 2020 15:25
To: 'Delaney, Colleen ENV:EX'
Cc: 'gregory.lee3@canada.ca'; O'Malley, David P ENV:EX; McCammon, Alan W ENV:EX
Subject: RE: Site 3727 Richmond Steel

Good afternoon Colleen,

We last spoke of this project back in July 2020. Since then we have worked with Richmond Steel to address their identified PCB contamination. They have started an investigation and verified that PCB-contaminated storm water is migrating offsite across leased crown land, and eventually discharging to the Fraser River. They have concluded that a Notice of Likely offsite Migration is not required for surface water. This opinion is stated in a letter from their CSAP, included as Appendix B in the attached Remediation plan.

Is this the correct interpretation of the EMA, and the CSR? If so, is there another way this site would be captured in the contaminated sites process, potentially as a high risk site?

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

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From: Delaney, Colleen ENV:EX [<mailto:Colleen.Delaney@gov.bc.ca>]

Sent: Tuesday, 21 July 2020 12:36

To: Mills, Warren

Cc: 'gregory.lee3@canada.ca'; O'Malley, David P ENV:EX; McCammon, Alan W ENV:EX

Subject: RE: Site 3727 Richmond Steel

Hello Warren,

Land Remediation has not received anything further for this site. Neither a Notification of Off-site Migration or a Notification of Independent Remediation has been filed.

Gregory, has Richmond Steel indicated what they plan to do yet?

Kind regards,

Colleen

From: Mills, Warren <WMills@richmond.ca>

Sent: July 20, 2020 3:39 PM

To: Delaney, Colleen ENV:EX <Colleen.Delaney@gov.bc.ca>

Cc: 'gregory.lee3@canada.ca' <gregory.lee3@canada.ca>; O'Malley, David P ENV:EX <David.OMalley@gov.bc.ca>;

McCammon, Alan W ENV:EX <Alan.Mccammon@gov.bc.ca>

Subject: RE: Site 3727 Richmond Steel

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Hi Colleen,

I am following up on this file. Since our last meeting, the applicant was notified of ECCC's investigation that concluded that substances have migrated from the site to a neighboring site.

Do you know at what stage of the CSR process this file is at?

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

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From: Delaney, Colleen ENV:EX [<mailto:Colleen.Delaney@gov.bc.ca>]

Sent: Friday, 14 February 2020 11:57

To: Mills, Warren
Cc: 'gregory.lee3@canada.ca'; O'Malley, David P ENV:EX; McCammon, Alan W ENV:EX
Subject: RE: Site 3727 Richmond Steel

Hi Warren,

Thank you for your email. It was great to be involved in the conversation yesterday.

Yes, as I said in the meeting, the responsible person does have the duty to notify the affected property owners and the ENV once they have carried out site investigation "that discloses that one or more substances has migrated or is likely to have migrated to a neighbouring site and is or is likely causing contamination of the neighbouring site". This duty, as you've identified below, is under section 60.1 (2) of the CSR. However, the ENV has no knowledge if such investigation has been carried out by the responsible person; therefore, ENV has no authority to enforce this provision.

As per Protocol 12 - Site Risk Classification, Reclassification and reporting, a responsible person also has the duty to submit a Site Risk Classification Report (SRCR) to the director, along with the submission of a NOM. To classify a site under this protocol and complete the required SRCR, an on-site investigation would be necessary. Risk classifications apply to toxicological risks associated with substances listed in the Contaminated Sites Regulation.

To clarify, I am not arguing that this is not a contaminated site or a hazardous site. What I tried to relay during the meeting was that our site profile process and the duty to submit a NOM are not currently the relevant tools that will allow the Land Remediation Section to take compliance and enforcement action against the responsible person.

Regards,
Colleen

Colleen Delaney, P.Ag.
Contaminated Sites Officer
Land Remediation Section
BC Ministry of Environment & Climate Change Strategy
Phone: 236-478-1407

The information or advice provided in this email is for guidance only and does not limit, and should not be construed as limiting, a director's exercise of discretion under the *Environmental Management Act*.

Warren Mills, B.Sc., E.P., P.Ag.
Environmental Coordinator
6911 No. 3 Road, Richmond, BC V6Y 2C1
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www.richmond.ca



From: Mills, Warren
Sent: Friday, 14 February 2020 08:40
To: 'Delaney, Colleen ENV:EX'
Subject: RE: High Risk Site AG 6 Release (Site 21988) 6540-6700 No. 3 Road, Richmond

Hi Colleen,

I was just looking at the relevant sections in the EMA, CSR, and HW regulations. I am of the opinion that the site should fall into the realm of the BC CSR, based on the following sections, in spite of the fact that there is no standard for PCBs in water.

In the CSR:

Notification of neighbouring site owners after site investigations

60.1

(1) A responsible person who carries out a site investigation that discloses that one or more substances has migrated or is likely to have migrated to a neighbouring site and is or is likely causing contamination of the neighbouring site must provide written notification described in subsection (2).

(2) The responsible person for the investigated site must provide written notification to the person or persons who own the neighbouring site and a copy of the notification to the director, within 15 days after the responsible person becomes aware of the migration or likely migration of each substance to the neighbouring site, giving

- (a) the name and address of the person or persons who own the investigated site,
- (b) the name, address and telephone number of the person to contact regarding the investigation, and
- (c) a general description of the nature of the migration or likely migration of each substance.

[en. B.C. Reg. 17/2002, s. 14; am. B.C. Regs. 322/2004 and 324/2004, s. 62.]

In the EMA:

"contaminated site" means an area of the land in which the soil or any groundwater lying beneath it, or the water or the underlying sediment, contains

- (a) a hazardous waste, or
- (b) another prescribed substance

in quantities or concentrations exceeding prescribed risk based or numerical criteria or standards or conditions;

"contamination" means the presence in soil, sediment, water or groundwater of

- (a) a hazardous waste, or
- (b) a substance prescribed for the purposes of paragraph (b) of the definition of "contaminated site"

In the Haz Waste Regulations

"hazardous waste" means

- (a) dangerous goods if they
 - (i) are no longer used for their original purpose, and

(ii)meet the criteria for Class 2, 3, 4, 5, 6, 8 or 9 of the federal dangerous goods regulations,

including those that are recycled, treated, abandoned, stored or disposed of, intended for recycling, treatment or disposal or in storage or transit before recycling, treatment or disposal,

(b)PCB wastes,

(b.1)biomedical wastes,

(c)wastes containing dioxin,

Feel free to give me a call to discuss.

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

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www.richmond.ca



2021-04-15 Richmond Steel PCB file Background Info - 11760 MITCHELL ROAD, RICHMOND, BC

From: Mills, Warren <WMills@richmond.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: April 15, 2021 4:50:44 PM PDT
Attachments: RE: Richmond Steel Drainage and Mitigation Plan Update, FA Warning Letter_Richmond Steel Recycling Limited_20200430_Signed.pdf, r-2160-10-03-Drainage and Mitigation-v1.pdf, image001.png, l-2160-10-03-PGL Update-v1.pdf, r-2160-10-03-Drainage and Mitigation-v1.pdf, RSR Update Letter to Environment Canada Warning Letter 20210315.pdf

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Thanks for your help Oana,

Here is some background.

- December 12, 2019. Environment Canada, City of Richmond, and Ministry of Environment did an inspection at the site.
- January 28th, 2020 Environment Canada got results showing that PCBs are in stormwater outflow that passed through leased crown land, to the Fraser River.
- April 30, 2020, Environment Canada sent a Warning letter (attached)
- September 2020, PGL prepares a storm water Drainage and Mitigation plan that includes the plan to investigate soil and groundwater.

Task	Duration	Start	Finish
Task 1 – Investigating PCB Sources	Three months	Started	January 2021
Task 2 – Source Control	Ongoing	October 2021	Ongoing
Task 3 – Surface Water Management	Up to one year	Started	September 2021
Task 4 – Treatment Area and Ditch Improvements (depending on FLNRORD approval)	Up to two years	October 2020	October 2022
Task 5 – Upgrades to Stormwater Management Practices	Up to one year	October 2020	October 2021

I questioned whether a Notice of Offsite Migration would be required because the storm water is leaving site, to the Fraser River and the leased crown land. The PGL CSAP, and MENV agreed that the CSR provisions for notification of offsite migration would not be triggered in this case. PGL CSAP opinion is attached to the Drainage and Mitigation plan. The Land authorization branch has been unresponsive to my requests for assistance in this file.

- March 15, 2021 Richmond Steel provides a 2nd response to the Warning letter to ECCC (attached) I don't have the first response letter.
- March 23, 2021, Richmond steel provides an update to the Stormwater Drainage and Mitigation plan that removes the soil and groundwater investigation, and reports that offsite sediment analysis was unsuccessful due to health and safety issues. No progress on applying for an FLNRORD approval for the "treatment area and Ditch". Surface water throughout the site still exceeded PCB standards in areas of permeable soils. (attached)
- April 7, 2021 -My comments to the update. (attached)

There are no identified regulatory triggers for a groundwater investigation at this time. Only storm water has been investigated, and this doesn't trigger an investigation. There are no triggers in the Site ID process, nor will there be any for the foreseeable future.

I would like to compel the site operator to investigate groundwater and sediment between the site, and the Fraser River to determine if PCBs are migrating offsite via these media. If present, this would trigger the a notice of offsite migration and a Site Risk Classification report.

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca

www.richmond.ca

RE: Richmond Steel Drainage and Mitigation Plan Update

From: Keith Gagne <kgagne@pggroup.com>
To: Mills, Warren <WMills@richmond.ca>
Cc: Karl Gustafson <karl.gustafson@mcmillan.ca>, Steven Kynoch <SKynoch@richmondsteel.ca>, Sebastien Rosner <Sebastien.Rosner@simsmm.com>, Sarah Greene <sgreene@pggroup.com>, Lee3, Gregory (EC) <gregory.lee3@canada.ca>, Patterson2, Samantha (EC) <samantha.patterson2@canada.ca>
Sent: April 15, 2021 9:59:04 AM PDT
Attachments: image008.png, image010.png, image012.png, image013.png, image014.png, image011.png, image009.png, image006.png, image007.png

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Warren

My apologies.

Let me get back to you on this early next week.

Keith

Keith Gagne, B.A.Sc., P.Eng. — Senior Consultant

PGL Environmental Consultants

T: 604.895.7618 | C: 778.231.5310 | pggroup.com



From: Mills, Warren <WMills@richmond.ca>

Sent: April 15, 2021 9:26 AM

To: Keith Gagne <kgagne@pggroup.com>

Cc: 'Karl Gustafson' <karl.gustafson@mcmillan.ca>; 'Steven Kynoch' <SKynoch@richmondsteel.ca>; 'Sebastien Rosner' <Sebastien.Rosner@simsmm.com>; Sarah Greene <sgreene@pggroup.com>; 'Lee3, Gregory (EC)' <gregory.lee3@canada.ca>; 'Patterson2, Samantha (EC)' <samantha.patterson2@canada.ca>

Subject: RE: Richmond Steel Drainage and Mitigation Plan Update

Importance: High

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Good morning,

I am following up on this issue. Can I get a response to the below questions by April 20th?

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca

www.richmond.ca

From: Mills, Warren

Sent: April 7, 2021 2:14 PM

To: 'Keith Gagne' <kgagne@pggroup.com>

Cc: Karl Gustafson <karl.gustafson@mcmillan.ca>; Steven Kynoch <SKynoch@richmondsteel.ca>; Sebastien Rosner <Sebastien.Rosner@simsmm.com>; Sarah Greene <sgreene@pggroup.com>; 'Lee3, Gregory (EC)' <gregory.lee3@canada.ca>; Patterson2, Samantha (EC) <samantha.patterson2@canada.ca>

Subject: RE: Richmond Steel Drainage and Mitigation Plan Update

Good afternoon Keith,

A couple questions:

- As PCBs have been identified throughout the site in onsite stormwater, is there any plan to ensure that the stormwater does not contaminate the groundwater through pervious services?
- The investigation of groundwater has been removed from the approved remediation plan. Has the pathway of PCBs travelling from onsite stormwater to the Fraser River via groundwater flow been investigated and concluded to be incomplete by PGL?
- At our last meeting we discussed obtaining sediment and stormwater samples near the outfall point. When will these results be available?
- When will the Water Act Approval be applied for?

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca

www.richmond.ca

From: Keith Gagne <kgagne@pggroup.com>

Sent: March 24, 2021 10:06 AM

To: Mills, Warren <WMills@richmond.ca>

Cc: Karl Gustafson <karl.gustafson@mcmillan.ca>; Steven Kynoch <SKynoch@richmondsteel.ca>; Sebastien Rosner <Sebastien.Rosner@simsmm.com>; Sarah Greene <sgreene@pggroup.com>

Subject: Richmond Steel Drainage and Mitigation Plan Update

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Warren

Attached please find the Richmond Steel Drainage and Mitigation Plan requested.

Any questions please call.

Keith

Keith Gagne, B.A.Sc., P.Eng. | Senior Consultant

T: 604.895.7618 C: 778.231.5310





1500 - 1185 West Georgia Street, Vancouver, BC, V6E 4E6 | pggroup.com

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WRITTEN WARNING

FISHERIES ACT

File: 8530-2019-12-09-1431

PROTECTED B
ENFORCEMENT

April 30, 2020

Registered with acknowledgement of receipt

The purpose of this warning is to inform:

Richmond Steel Recycling Limited
Floor 25 - 700 West Georgia Street
Vancouver, BC V7Y1B3

c/o Harbinder Dhillon
President
Richmond Steel Recycling Limited
Floor 25 - 700 West Georgia Street
Vancouver, BC V7Y1B3

Harbinder Dhillon
President
Richmond Steel Recycling Limited
Floor 25 - 700 West Georgia Street
Vancouver, BC V7Y1B3

That information obtained under inspection by the undersigned fishery officer designated by the Minister of Environment under the *Fisheries Act*, gives me reasonable grounds to believe that Richmond Steel Recycling Limited and its responsible officials were in contravention of section 36(3) made pursuant to the *Fisheries Act*.

ALLEGED FACTS

As a result of an on-site inspection, I, Gregory Lee, the undersigned fishery officer determined the following alleged facts:

Canada

1. That on December 12, 2019, I conducted an on-site inspection at Richmond Steel Recycling Limited located at 11760 Mitchell Rd, Richmond, BC V6V 1V8, hereinafter referred to as "the property".
2. That on December 12, 2019 I witnessed a pool of sediment-laden water with a grey sheen on its surface, in an unpaved area on the South-East side of the property directly adjacent to the Fraser River. I witnessed sediment-laden water with a grey sheen flowing from the aforementioned pool of water toward the Fraser River, and discharging directly into the Fraser River from the foreshore of the property.
3. That on December 12, 2019 I witnessed a grey sheen spreading across the surface of the Fraser River, originating at the flow of water discharging from foreshore of the property.
4. That on December 12, 2019 samples were collected for analysis from the aforementioned flow of water into the Fraser River, and from a treatment ditch on the East side of the property which flows into the Fraser River. those samples were submitted for analysis to the Environment and Climate Change Canada, Pacific & Yukon Laboratory for Environmental Testing (PYLET).
5. That on January 28, 2020 I received the completed analysis results for those samples. The analysis results for the aforementioned flow of water into the Fraser River indicated a concentration of 20.8ug/L of AROCLOR-1242, a variant of poly-chlorinated biphenyls (PCB's). The analysis results for the water in the treatment ditch which flows into the Fraser River indicated a concentration of 10.1ug/L of PCB AROCLOR-1242.
6. That based on expert opinions provided to me by Regulatory Toxicologists at Environment Canada's Atlantic, and Pacific and Yukon Laboratories for Environmental Testing (ALET and PYLET), polychlorinated biphenyls are considered to be deleterious to fish as defined by the *Fisheries Act*.
7. That the Fraser River, which is part of the Pacific Ocean, is "water frequented by fish" as defined by the *Fisheries Act* and part of the Fisheries and Oceans Canada Fisheries Management Area 29 – Lower Mainland, Sunshine Coast, Fraser River. [Http://www.pac.dfo-mpo.gc.ca/fm-gp/rec/tidal-maree/a-s29-eng.html](http://www.pac.dfo-mpo.gc.ca/fm-gp/rec/tidal-maree/a-s29-eng.html).
8. That based on a BC Online corporate summary; Richmond Steel Recycling Limited is registered at the address: 25th Floor, 700 West Georgia Street, Vancouver, BC V7Y 1B3.
9. That Richmond Steel Recycling Limited, and its responsible officials, owns and has care and control of the aforementioned substance(s).

THE LAW

Fisheries Act

Deposit of Deleterious Substance Prohibited

- 36(3) Subject to subsection (4), no person shall deposit or permit the deposit of a deleterious substance of any type in water frequented by fish or in any place under any conditions where the deleterious substance or any other deleterious substance that results from the deposit of the deleterious substance may enter any such water.

Duty to notify – deleterious substance

- 38(5) If there occurs a deposit of a deleterious substance in water frequented by fish that is not authorized under this Act, or if there is a serious and imminent danger of such an occurrence, and detriment to fish habitat or fish or to the use by humans of fish results or may reasonably be expected to result from the occurrence, then every person shall without delay notify an inspector, a fishery officer or an authority prescribed by the regulations if the person at any material time.

Duty to take corrective measures

- 38(6) Any person described in paragraph (4)(a) or (b) or (5)(a) or (b) shall, as soon as feasible, take all reasonable measures consistent with public safety and with the conservation and protection of fish and fish habitat to prevent the occurrence or to counteract, mitigate or remedy any adverse effects that result from the occurrence or might reasonably be expected to result from it

Offence and punishment

- 40(2) Every person who contravenes subsection 36(1) or (3) is guilty of an offence and liable

(a) on conviction on indictment,

(i) in the case of an individual,

- (A) for a first offence, to a fine of not less than \$15,000 and not more than \$1,000,000, and
(B) for a second or subsequent offence, to a fine of not less than \$30,000 and not more than \$2,000,000, or to imprisonment for a term not exceeding three years, or to both,

(ii) in the case of a person, other than an individual or a corporation referred to in subparagraph (iii),

- (A) for a first offence, to a fine of not less than \$500,000 and not more than \$6,000,000, and
(B) for a second or subsequent offence, to a fine of not less than \$1,000,000 and not more than \$12,000,000, and

(iii) in the case of a corporation that the court has determined to be a small revenue corporation,

- (A) for a first offence, to a fine of not less than \$75,000 and not more than \$4,000,000, and
(B) for a second or subsequent offence, to a fine of not less than \$150,000 and not more than \$8,000,000; or

(b) on summary conviction,

(i) in the case of an individual,

- (A) for a first offence, to a fine of not less than \$5,000 and not more than \$300,000, and
(B) for a second or subsequent offence, to a fine of not less than \$10,000 and not more than \$600,000, or to imprisonment for a term not exceeding six months, or to both,

(ii) in the case of a person, other than an individual or a corporation referred to in subparagraph (iii),

- (A) for a first offence, to a fine of not less than \$100,000 and not more than \$4,000,000, and
(B) for a second or subsequent offence, to a fine of not less than \$200,000 and not more than \$8,000,000, and

(iii) in the case of a corporation that the court has determined to be a small revenue corporation,

- (A) for a first offence, to a fine of not less than \$25,000 and not more than \$2,000,000, and
(B) for a second or subsequent offence, to a fine of not less than \$50,000 and not more than \$4,000,000.

Other Offences

- 40(3) Every person who

- (c) fails to provide notification that he or she is required to provide under subsection 38(4) or (5), or
- (e) fails to take any reasonable measures that he or she is required to take under subsection 38(6) or fails to take those measures in the required manner;

is guilty of an offence punishable on summary conviction and liable, for a first offence, to a fine not exceeding two hundred thousand dollars and, for any subsequent offence, to a fine not exceeding two hundred thousand dollars or to imprisonment for a term not exceeding six months, or to both.

Continuing Offence

78.1 Where any contravention of this Act or the regulations is committed or continued on more than one day, it constitutes a separate offence for each day on which the contravention is committed or continued.

Offences by corporate officers, directors or agents

78.2 Where a corporation commits an offence under this Act, any officer, director or agent of the corporation who directed, authorized, assented to, acquiesced in or participated in the commission of the offence is a party to and guilty of the offence and is liable on conviction to the punishment provided for the offence, whether or not the corporation has been prosecuted.

CONCLUSION

This warning alleges a contravention of section 36(3) of the *Fisheries Act*. It is intended to bring this matter to your attention in order for you to take the necessary corrective action to ensure compliance with the *Fisheries Act* or to exercise due diligence in the future. This document is not a finding of guilt or civil liability, and is not an administrative adjudication.

This warning and the circumstances to which it refers will form part of Environment and Climate Change Canada's records of Richmond Steel Recycling Limited and its responsible officials, and will be taken into account in future responses to alleged violations and for internal purposes such as setting the frequency of inspections. Environment and Climate Change Canada will consider taking further action if you do not take all necessary corrective steps to comply or if you do not exercise due diligence in the future.

This warning is issued in accordance with the Compliance and Enforcement Policy for the Habitat Protection and Pollution Prevention Provisions of the *Fisheries Act*. The complete text of this policy is available on Environment and Climate Change Canada's website:

<https://www.canada.ca/en/environment-climate-change/services/environmental-enforcement/publications/compliance-enforcement-policy-fisheries-act.html>

The complete text of the *Fisheries Act* available on the Department of Justice website: <http://laws-lois.justice.gc.ca/Search/>

For more information or to respond to the alleged facts contained in this warning, please call or write the undersigned. Your comments will be considered, and where appropriate, a response provided. Any comments you make, as well as Environment and Climate Change Canada's response, will be maintained on file with this warning in Environment and Climate Change Canada's records.

Gregory Lee
Inspector and Fishery Officer
Environmental Enforcement Directorate
Enforcement Branch
Environment and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street, Vancouver, BC, V6C 3S5
email: gregory.lee3@canada.ca
telephone: 604-404-2482

cc.

Susanne Marble
Operations Manager, Coastal District
Environmental Enforcement Directorate
Enforcement Branch
Environment and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street, Vancouver, BC V6C 3S5
Canada

Alan W. McCammon, MSc PGeo
Manager, Remediation Assurance & Brownfields | Land Remediation
BC Ministry of Environment & Climate Change Strategy
#200 - 10470 152nd Street
Surrey, BC V3R 0Y3
Canada

Catherine Allard
Senior Authorizations Officer (Land)
South Coast Regional Office
Ministry of Forests, Lands & Natural Resource Operations and Rural Development
Suite 200 - 10428 153 St
Surrey, BC V3R 1E1
Canada

David O'Malley, M.Sc.
Environmental Protection Officer
Compliance Section
Regional Operations Branch
Environmental Protection Division, Ministry of Environment & Climate Change
#200 - 10470 152nd Street
Surrey, BC V3R 0Y3
Canada

11760 Mitchell Road
Richmond, BC

Drainage and Mitigation Plan Development Strategy



PREPARED FOR:

McMillan LLP
Suite 1500 – 1055 West Georgia Street
Vancouver, BC V6E 4N7

PREPARED BY:

PGL Environmental Consultants
#1500 – 1185 West Georgia Street
Vancouver, BC V6E 4E6

PGL File: 2160-10.03 T04

September 2020



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Page 020 of 282 to/à Page 047 of 282

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Richmond Steel Recycling Ltd.
11660 Mitchell Road
Richmond, BC V6V 1V8
email@richmondsteel.ca

March 15, 2021

Environment Canada
Environmental Enforcement Directorate
Enforcement Branch
Environmental and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street
Vancouver, BC, V6C 3S5

Attention: Gregory Lee, Inspector and Fishery Officer

Dear Sirs/Mesdames;

Written Warning – Fisheries Act: Your File: 8530-2019-12-09-1431

We refer to your letter dated April 30, 2020 (the “**Warning Letter**”) addressed to Richmond Steel Recycling Ltd. (“**RSR**”) and to our letter dated August 13, 2020 in response (the “**RSR Response Letter**”).

The Warning Letter identified a number of concerns regarding the quality and management of storm water at our Mitchell Island facility based on your site inspection on December 12, 2019. As we noted in the RSR Response Letter, RSR takes these concerns seriously and we took immediate action to begin to address the concerns. We have continued since then to investigate how to address the remaining concerns. This letter will provide an update on our efforts to respond to the Warning Letter.

RSR retained Pottinger Gaherty Environmental Consultants Ltd. (“**PGL**”) to develop a ‘Stormwater Management and Mitigation Plan’ (the “**Stormwater Plan**”). That plan included undertaking additional investigation of site conditions to help inform RSR’s decisions as to the steps required to manage stormwater effectively.

As noted in the RSR Response Letter, the circumstances in which stormwater might bypass our collection and treatment facilities and flow directly from our site into the Fraser River, are extremely rare. Nevertheless, we are pleased to report that the measures we took immediately after the December 12, 2019 event have been successful in preventing a reoccurrence, even in periods of very heavy rainfall. We will continue to monitor that particular situation and will take further action as needed. We also expect that our ongoing project to improve stormwater management in the yard will assist in reducing any risk of stormwater runoff moving directly to the Fraser River.

The approach we anticipated initially under the Stormwater Plan was, among other things, to upgrade the existing treatment works (including cleaning and rehabilitating the bioswale and drainage ditch). However, based on the recommendation of PGL, we have adjusted the Stormwater Plan to include the investigation of options to install a water treatment plant on the site. We have determined that we do not require a permit or other regulatory approval to test potential stormwater treatment systems or to install and operate a treatment system if we succeed in identifying one we assess to be effective and viable.

{00249831v.2}

It is important to note that the Stormwater Plan still includes work to clean and rehabilitate the bioswale and ditch and to upgrade and increase the capacity of the existing oil/water separator and grit chamber. The water treatment facility will supplement those works. We anticipate that, if a stormwater treatment facility is installed, it is likely best to be place it on land reclaimed from a portion of the ditch that feeds into the bioswale. The work to clean up and rehabilitate the bioswale, and possibly some portion of the ditch, is a necessary component of the Stormwater Plan but will require regulatory approval. In that respect, we are now in the process of preparing an application to submit to the BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development (“**FLNRORD**”). That application that will include work to clean and rehabilitate the bioswale to deal with any historical contamination and to reclaim a portion of the ditch to accommodate a water treatment facility.

RSR’s previous drainage improvement program (including expansion of the paved area and adjusting related collection and drainage works) was incorporated into the Stormwater Plan and is progressing. The Stormwater Plan now includes additional measures to minimize receipt of materials containing PCBs. In addition, recognizing that it is likely impossible to eliminate materials potentially containing PCBs from the inbound industrial and municipal streams we recycle, the Stormwater Plan includes measures to manage more effectively those materials and the residues potentially containing PCBs. This includes covering the ASR storage pile.

The Stormwater Plan also contemplates the diversion of ‘clean’ stormwater (i.e. stormwater not potentially impacted by our operations). That diversion will reduce the hydraulic load on, and improve the effectiveness of, our existing water treatment works and the proposed new water treatment plant.

We are proceeding to implement as many of the steps contemplated by the Stormwater Plan as quickly as is reasonably practicable. However, key elements of that plan (i.e. cleaning and rehabilitating the bioswale and reclaiming a portion of the ditch to accommodate a water treatment plant) will require approval from FLNRORD. We will welcome any support you are able to provide in connection with the FLNRORD application.

If you have any questions or concerns with respect to the Stormwater Plan please contact us. Thank you.

Yours truly,

Sebastien Rosner
VP, Operations



cc.

David O’Malley
Environmental Protection Division,
Ministry of Environment & Climate Change

2021-04-21 Richmond Steel Drainage and Mitigation Plan Update

From: Mills, Warren <WMills@richmond.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: April 21, 2021 10:02:01 AM PDT
Attachments: image017.png, image001.png, image003.png, image004.png, image002.png, image018.png, image015.png, image016.png, image014.png

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Below is the most recent response from site operator QEP.

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca

www.richmond.ca

From: Keith Gagne <kgagne@pggroup.com>

Sent: April 21, 2021 9:55 AM

To: Mills, Warren <WMills@richmond.ca>

Cc: 'Karl Gustafson' <karl.gustafson@mcmillan.ca>; 'Steven Kynoch' <SKynoch@richmondsteel.ca>; 'Sebastien Rosner' <Sebastien.Rosner@simsmm.com>; 'Lee3, Gregory (EC)' <gregory.lee3@canada.ca>; 'Patterson2, Samantha (EC)' <samantha.patterson2@canada.ca>; Sarah Barr <sbarr@pggroup.com>

Subject: RE: Richmond Steel Drainage and Mitigation Plan Update

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Warren

Please see below.

Keith

Keith Gagne, B.A.Sc., P.Eng. – Senior Consultant

PGL Environmental Consultants

T: 604.895.7618 | C: 778.231.5310 | pggroup.com



From: Mills, Warren

Sent: April 7, 2021 2:14 PM

To: 'Keith Gagne' <kgagne@pggroup.com>

Cc: Karl Gustafson <karl.gustafson@mcmillan.ca>; Steven Kynoch <SKynoch@richmondsteel.ca>; Sebastien Rosner <Sebastien.Rosner@simsmm.com>; Sarah Greene <sgreene@pggroup.com>; 'Lee3, Gregory (EC)' <gregory.lee3@canada.ca>; Patterson2, Samantha (EC) <samantha.patterson2@canada.ca>

Subject: RE: Richmond Steel Drainage and Mitigation Plan Update

Good afternoon Keith,

A couple questions:

- As PCBs have been identified throughout the site in onsite stormwater, is there any plan to ensure that the stormwater does not contaminate the groundwater through pervious services?

The majority of the Site is hard surfaced and it is my understanding that Richmond Steel is plans to hard surface the balance of their site.

- The investigation of groundwater has been removed from the approved remediation plan. Has the pathway of PCBs travelling from onsite stormwater to the Fraser River via groundwater flow been investigated and concluded to be incomplete by PGL?

No groundwater investigation has taken place at that time.

-At our last meeting we discussed obtaining sediment and stormwater samples near the outfall point. When will these results be available?

The ditch has had some of its overgrowth removed to complete the survey for the FLNRONR application. Now that that has been completed and a Health and Safety Plan developed we are planning to sample the week of April 26, 2021.

-When will the Water Act Approval be applied for?

The work has been commissioned by Richmond Steel and work has begun; bird surveys, physical survey plan, vegetation surveys, sediment delineation, compensation areas, etc. have all taken place. We anticipate that the submission will take place in late May/early June, 2021. Some of this work depends on other contractors, such as surveyors and outside engineering groups for the drawings required by FLNRORD. Once we have made the application we will be seeking your support to try and move this through the regulatory process as fast as possible.

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca

www.richmond.ca

From: Keith Gagne <kgagne@pggroup.com>

Sent: March 24, 2021 10:06 AM

To: Mills, Warren <WMills@richmond.ca>

Cc: Karl Gustafson <karl.gustafson@mcmillan.ca>; Steven Kynoch <SKynoch@richmondsteel.ca>; Sebastien Rosner <Sebastien.Rosner@simsmm.com>; Sarah Greene <sgreene@pggroup.com>

Subject: Richmond Steel Drainage and Mitigation Plan Update

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Warren

Attached please find the Richmond Steel Drainage and Mitigation Plan requested.

Any questions please call.

Keith

Keith Gagne, B.A.Sc., P.Eng. | Senior Consultant
T: 604.895.7618 C: 778.231.5310



1500 - 1185 West Georgia Street, Vancouver, BC, V6E 4E6 | pggroup.com

Please consider the environment before printing this email.

Notice of Confidentiality: This document is for the addressee only and may be confidential or privileged.

If this was received in error, please respond and delete this message.

Richmond Steel

From: Enick, Oana V ENV:EX
To: gregory.lee3@canada.ca
Sent: April 26, 2021 3:56:02 PM PDT
Attachments: image002.jpg, image003.jpg, image004.jpg, image001.png
Hello Greg:

Thank you for taking the time to chat this afternoon. I appreciate the opportunity to connect on the Richmond Steel file as we move forward.

Please do go ahead with the meeting invite.

Have a great rest of the day, Oana.



Oana Enick, MET, RPBio | Compliance Operations

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

Accepted_Richmond Steel.msg.ics

Sent: April 27, 2021 2:12:05 PM PDT

Received: April 27, 2021 2:12:00 PM PDT

File name: Accepted_Richmond Steel.msg.ics

File extension: ics

Priority: Normal (5)

Address: (UTC-08:00) Pacific Time (US & Canada)

Calendar Item Type: REPLY

From: Enick, Oana V ENV:EX
Sent: April 27, 2021 2:12 PM
To: Lee3, Gregory (EC)
Subject: Accepted: Richmond Steel

Hi Greg:

Thanks for setting this up. You are right – we probably crossed paths on a few other files. Oana.

RE: Richmond Steel

From: Mills, Warren <WMills@richmond.ca>
To: Lee3, Gregory (EC) <gregory.lee3@canada.ca>, Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: May 11, 2021 2:25:02 PM PDT
Attachments: image001.jpg, image005.jpg, image007.jpg, image006.jpg, image002.png

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I am booked up 930-3 on this May 18.

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca

www.richmond.ca

-----Original Appointment-----

From: Lee3, Gregory (EC) <gregory.lee3@canada.ca>

Sent: May 11, 2021 2:02 PM

To: 'Enick, Oana V ENV:EX'; Mills, Warren

Subject: Richmond Steel

When: May 18, 2021 1:00 PM-2:00 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Microsoft Teams Meeting

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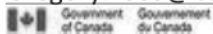
Mind if we have this meeting on the 18th instead?

Gregory Lee

Environmental Enforcement Officer

Environment Canada Enforcement Branch

Gregory.Lee3@Canada.ca | Cell: 604-404-2482



Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

Or call in (audio only)

s.15; s.16

[Find a local number](#) | [Reset PIN](#)

[Learn More](#) | [Meeting options](#)

From: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>

Sent: April 26, 2021 3:56 PM

To: Lee3, Gregory (EC) <gregory.lee3@canada.ca>

Subject: Richmond Steel

Hello Greg:

Thank you for taking the time to chat this afternoon. I appreciate the opportunity to connect on the Richmond Steel file as we move forward.

Please do go ahead with the meeting invite.

Have a great rest of the day, Oana.



Oana Enick, MET, RPBio | Compliance Operations

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 [@ComplianceBC](#) *To report a spill call the Provincial Emergency Program at 1-800-663-3456*

More information about Environmental Compliance and how it is assessed can be found [here](#).

Richmond Steel Follow-up.msg.ics

Sent: May 21, 2021 7:04:03 AM PDT

Received: May 21, 2021 7:04:00 AM PDT

File name: Richmond Steel Follow-up.msg.ics

File extension: ics

Priority: Normal (5)

Address: (UTC-08:00) Pacific Time (US & Canada)

Calendar Item Type: REQUEST

Good Morning:

This is our follow-up call. Feel free to suggest another time if you need to do so.

Thanks, Oana.

Microsoft Teams meeting

Join on your computer or mobile app

s.15

Accepted_Richmond Steel recurring meeting.msg.ics

Sent: May 25, 2021 7:42:41 AM PDT

Received: May 25, 2021 7:42:00 AM PDT

File name: Accepted_Richmond Steel recurring meeting.msg.ics

File extension: ics

Priority: Normal (5)

Calendar Item Type: REPLY

RE: Richmond Steel sample description December 2019

From: Enick, Oana V ENV:EX
To: Lee3, Gregory (EC) <gregory.lee3@canada.ca>
Sent: May 25, 2021 1:05:58 PM PDT
Attachments: image003.jpg, image005.jpg, image006.jpg, image004.jpg, image002.png

Perfect. Thanks. Oana.



Oana Enick, MET, RPBio | Compliance Operations

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

From: Lee3, Gregory (EC) <gregory.lee3@canada.ca>
Sent: May 25, 2021 1:05 PM
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Subject: Richmond Steel sample description December 2019

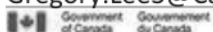
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Sample ID – Location – Analysis

3362 - Shore - PAH / APAH
3363 - Shore - LEPH / HEPH
3364 - Shore - PCB
3365 - Shore - LT50
3366 - Shore - TSS
3367 - Shore - Total Metals
3368 - Shore - pH, conductivity, hardness
3369 - Shore - Dissolved Metals

3370 - Bioswale - LEPH / HEPH
3371 - Bioswale - PAH / APAH
3372 - Bioswale - TSS
3373 - Bioswale - Total Hydrocarbons
3374 - Bioswale - PCB
3375 - Bioswale - pH, conductivity, hardness
3376 - Bioswale - Metals
3377 - Bioswale - Dissolved Metals
3378 - Bioswale - LT50

Gregory Lee
Environmental Enforcement Officer
Environment Canada Enforcement Branch
Gregory.Lee3@Canada.ca | Cell: 604-404-2482



Richmond Steel Follow-up

From: Enick, Oana V ENV:EX
To: Lee3, Gregory (EC) <gregory.lee3@canada.ca>
Sent: June 9, 2021 12:08:37 PM PDT
Attachments: image002.jpg, image003.jpg, image004.jpg, image001.png
Hi Greg:

I'm sorry I missed getting back to you yesterday. Please accept my apologies. I sent you a meeting invite; whenever you have time to chat, please let me know. I spoke with my boss and he would like to attend the meeting next week with you and your boss as well if that's ok.

Let's connect when you have time, Oana.



Oana Enick, MET, RPBio | Compliance Operations

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

RE: Richmond Steel Follow-up

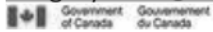
From: Lee3, Gregory (EC) <gregory.lee3@canada.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: June 10, 2021 1:26:34 PM PDT
Attachments: image006.png, image001.jpg, image002.jpg, image008.jpg, image005.jpg

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Hi Oana, no problem s.22
you're free.

so I couldn't answer your call. I'll call you sometime later today if

Gregory.Lee3@Canada.ca | Cell: 604-404-2482



From: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: June 9, 2021 12:09 PM
To: Lee3, Gregory (EC) <gregory.lee3@canada.ca>
Subject: Richmond Steel Follow-up

Hi Greg:

I'm sorry I missed getting back to you yesterday. Please accept my apologies. I sent you a meeting invite; whenever you have time to chat, please let me know. I spoke with my boss and he would like to attend the meeting next week with you and your boss as well if that's ok.

Let's connect when you have time, Oana.



Oana Enick, MET, RPBio | Compliance Operations

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)



@ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

RE: Richmond Steel Draft PPO

From: Lee3, Gregory (EC) <gregory.lee3@canada.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Cc: Poole, Kathryn ENV:EX <Kathryn.Poole@gov.bc.ca>
Sent: June 21, 2021 1:27:40 PM PDT
Attachments: image006.png, BC Fed-Prov Spill Response MOU.pdf, image003.jpg, image004.jpg, image008.jpg, image005.jpg

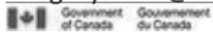
[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Oana,

Thanks for sharing this draft with us. I shared it with Ken and Samantha and we had no comments on the order itself other than it looks technically well written.

I thought I would also share with you our copy of the memorandum of understanding between EC and BC ENV in relation to spills of oil and hazardous materials into fish-bearing waters from land-based sources, in case it may be useful to reference. The document details the agreement between our two agencies to provide support services as requested (section 5.4) and to cooperate and advise each other of actions taken and by consulting each other regarding concerns under the other's jurisdiction (section 5.5). The MoU also states that we will optimize the use of resources by both governments (1.3) by clearly identifying complimentary tasks, and that we both have legislation allowing us to issue orders for remedial action in response to these types of spills (1.2). Your use of EC sample results appears to be in line with this MoU.

Gregory.Lee3@Canada.ca | Cell: 604-404-2482



From: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: June 17, 2021 2:34 PM
To: Lee3, Gregory (EC) <gregory.lee3@canada.ca>
Cc: Poole, Kathryn ENV:EX <Kathryn.Poole@gov.bc.ca>
Subject: Richmond Steel Draft PPO

Hello Greg:

Here is the Draft Pollution Prevention Order for Richmond Steel.

Once I hear back from you, we will proceed as Dan mentioned. Please feel free to share with Ken and Samantha. Thanks, Oana.



Oana Enick, MET, RPBio | Compliance Operations

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

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@ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

UNDERSTANDING BETWEEN CANADA AND BRITISH COLUMBIA
CONCERNING FEDERAL/PROVINCIAL RESPONSIBILITIES
IN OIL AND HAZARDOUS MATERIAL SPILLS

1.0 Introduction

- 1.1 The purpose of this understanding between Environment Canada and the British Columbia Ministry of Environment is to outline our common understanding of the administrative arrangements pertaining to environmental emergencies in British Columbia.
- 1.2 Both Canada and British Columbia have legislation concerning spills of oil and hazardous materials into the environment. Among other things, these Acts and regulations provide that the governments may investigate such spills, permit the governments to order those responsible for the spill to take remedial actions, and permit direct government remedial action and recovery of costs if necessary.
- 1.3 This common understanding will facilitate a timely and effective response to spills of oil and hazardous materials, and will optimize the use of resources by both governments by clearly identifying complementary tasks. For the purposes of this understanding Canada's response will be that provided by the Department of Environment except in those cases where responses are called for by other Federal Departments in accordance with already established arrangements or response plans such as the National Marine Emergency Plan or the Joint Canada-United States Marine Pollution Contingency Plan.

2.0 General

- 2.1 This document is intended to define an agreed division of tasks. It is not intended to prejudice any authority granted by Federal or Provincial statute nor in the case of marine emergencies, to prejudice or supersede established procedures set out in the National Marine Emergency Plan, the Joint Canada-United States Marine Pollution Contingency Plan or the Western Region (CCG) Marine Pollution Contingency Plan. This understanding focuses on Federal and Provincial roles and does not deal with responsibilities of other parties such as municipalities or the polluter.
- 2.2 This understanding is not intended to and shall not prejudice any Federal or Provincial authority granted by the Constitution of Canada. For greater certainty, this understanding shall not prevent any agency having statutory responsibility from exercising such responsibilities as it deems necessary.
- 2.3 This understanding shall be reviewed annually.

3.0 Definitions

- 3.1 "Boundary waters" means those fresh waters which cross or form the Canada-U.S. border, and those marine waters in which spills are dealt with by the Joint Canada-United States Marine Pollution Contingency Plan.

- 3.2 "Federal facilities" means all Federal lands and works and facilities of the agencies listed in Schedules A and B of the Financial Administration Act, and of the National Harbours Board and Harbour Commissions.
- 3.3 "Foreshore" means that part of the shore between high tide and low tide marks.
- 3.4 "Hazardous material" means any solid, liquid or gaseous material, substance or product, which by itself, or in conjunction with other materials because of its presence or proximity, presents a hazard to or adversely affects man or any plant matter, animal or other living thing, or has a potential to do so; but for purposes of this document, does not include radioactive materials or radioactive waste products of any kind which are under the jurisdiction of the Atomic Energy Control Board.
- 3.5 "Lead Agency" means that agency designated by statute, interagency agreement, Cabinet decision and/or custom and precedent to lead the response to an emergency on behalf of that government.
- 3.6 "Marine waters" means any salt water and the foreshores contiguous to the coast of British Columbia including river estuaries to the salt water sports fishing boundaries.
- 3.7 "Municipality" means a village, town, city or district constituted under any Act, and includes a regional district or improvement district.

3.8 "NATES" means National Analysis of Trends in Emergencies System.

3.9 "NEELS" means National Emergency Equipment Locator System.

3.10 "Oil" means oil of any kind or in any form, including but not limited to petroleum, fuel oil, vegetable or similar oils, sludge oil, and oil mixed with wastes, debris, soil or any matter other than dredged spoil.

3.11 "RTC/CTC" means the Railway Transport Committee of the Canadian Transport Commission.

3.12 "Ship" means every description of vessel used in navigation and not propelled by oars, and includes every description of lighter, barge, or like vessel used in navigation in Canada however propelled.

4.0 Lead Agency Responsibilities

4.1 The lead agency is required to undertake the necessary preparatory measures such as contingency planning, training, and appropriate liaison with resource agencies, involved commercial organizations, the public and other interested parties. When an emergency occurs that is within a lead agency's mandate, that agency is responsible for organizing, commanding and funding (subject to clause 4.2) the government response. However, a lead agency is not expected to provide all the resources and expertise required to undertake an emergency response, but rather, those that are not available elsewhere in the total lead-resource agency inventory.

- 4.2 The lead agency will assume the immediate financial obligations for response activities which it authorizes, in accordance with the established financial procedures. Action for recovery of such expenditures will be the responsibility of the lead agency.

5.0 Response to Spills

- 5.1 Canada will provide a lead agency responsible for spills of oil and hazardous materials in the following circumstances:
- a) Spills from ships. Such spills will be dealt with in accordance with the Western Region (CCS) Marine Pollution Contingency Plan, the National Marine Emergency Plan, or the Joint Canada-United States Marine Pollution Contingency Plan.
 - b) Spills from Federal facilities, or from any source to such facilities.
 - c) Spills of unknown (mystery) origin in or to marine waters.
 - d) Spills from land-based facilities to marine waters.
 - e) Spills from any origin which threaten to cross the Canada/U.S.A. boundary waters. For marine waters, the Joint Canada/U.S. Marine Contingency Plan determines the response. For other boundary (fresh) waters federal commitments exist under the Boundary Waters Act and the Joint Canada/U.S. Water Quality Agreement.

5.2 British Columbia will provide a lead agency responsible for spills of oil and hazardous materials under all circumstances not specified under paragraphs 5.1 regardless of origin.

5.3 Canada and British Columbia shall each maintain a 24-hour, 7 day/week capacity to receive and disseminate spill reports on an immediate basis and to initiate appropriate responses.

5.4 In any spill situation, both Canada and British Columbia shall cooperate by providing available support services to the designated lead agency as specified in the contingency plan or as requested by the lead agency following the principles set out in Section 4.0.

5.5 In respect of every spill, both Canada and British Columbia shall cooperate by advising each other of actions taken and by consulting each other regarding concerns under the other's jurisdiction.

5.6 British Columbia shall designate specific areas and authorize specific means for the disposal of recovered oil or hazardous materials and associated debris from all spills.

6.0 Legal Action Resulting from Spills of Oil and Hazardous Materials

6.1 Each government will coordinate preliminary investigations for incidents where it provides the lead agency, but without prejudice to the right or responsibility under statute of any agency of Canada or the Province to investigate.

7.0 Contingency Planning

7.1 Canada and British Columbia agree to prepare a Canada/B.C. Oil and Hazardous Materials Spill Contingency Plan and supporting Action Plans, which will elaborate on specific arrangements for implementing this Understanding.

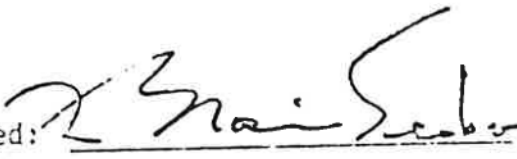
7.2 Canada and British Columbia will be responsible for training of their respective employees but may conduct joint education and training programs to meet the requirements of both governments.

8.0 Prevention

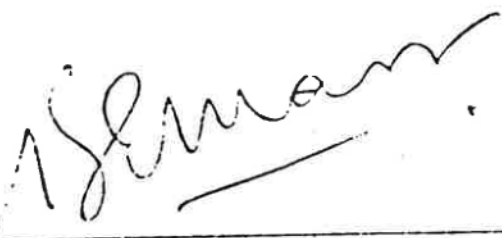
8.1 British Columbia, with the cooperation of Canada, will promote and assist spill prevention and contingency planning for municipalities and industries, including those municipalities and industries which may cause or experience spills into or near marine and fresh waters.

8.2 Canada, with the cooperation of British Columbia, will promote and assist spill prevention and contingency planning for the railways under the jurisdiction of RTC/CTC. British Columbia, with the cooperation of Canada, will promote and assist spill prevention and contingency planning programs for railways under provincial jurisdiction.

- 8.3 Canada shall develop and maintain NEELS and NATES programs. British Columbia shall support these programs by providing appropriate data.
- 8.4 Both governments may conduct studies on any aspect of the oil and hazardous material spill problem and shall consult each other about the conduct and results of such studies.
- 8.5 Canada will continue to conduct research and development of oil and hazardous material spill countermeasures technology, and to make available results of this program to government, industry, and the public.

Signed: 

J. B. Seaborn,
Deputy Minister,
Department of the Environment,
Canada


B. E. Marr, P. Eng.,
Deputy Minister of Environment,
Province of British Columbia

26 June 1981, Victoria, B.C.

26 June 1981, Victoria, B.C.

SCHEDULE A

Originally authorized by the Financial Administration Act, chapter 12, SC 1951 (2nd Session) revised by subsequent amendments to the FA Act, including chapter F-10, RSC 1970. The following listing also reflects changes made to conform with subsequent legislation establishing new departments or re-organizing departments.

In respect of each department, the "appropriate Minister" for purposes of the FA Act is the Minister presiding over the department (FA Act 2).

Department of Agriculture
Department of Communications
Department of Consumer and Corporate Affairs
Department of Employment and Immigration (Employment and Immigration Reorganization Act, chap. 54, SC 1976-77, effective 15-8-77, SI/77-136, 12-10-77, Canada Gazette Part II, 12-10-77)
Department of Energy, Mines and Resources
Department of the Environment (Dept. of Environment Act, Part I, Gov't Org. Act, 1970 and Part III, Gov't Org. Act, 1979)
Department of External Affairs
Department of Finance
Department of Fisheries and Oceans (Part I Gov't Org. Act 1979)
Department of Indian Affairs and Northern Development
Department of Industry, Trade and Commerce
Department of Insurance (Minister of Finance - Dept. of Insurance Act, Sec. 2)
Department of Justice
Department of Labour
Department of National Defence
Department of National Health and Welfare
Department of National Revenue
Post Office Department (The Postmaster General is the Minister presiding over the Department. Where no member of the Queen's Privy Council holds the office of Postmaster General by appointment to that office by commission under the Great Seal of Canada, the Minister of Communications is the Postmaster General and has the management and direction of the Post Office Department (P.O. Act 3, as amended by the Government Organization Act 1970, chap. 42, SC 1970-71))
Department of Public Works
Department of Regional Economic Expansion
Department of Supply and Services
Department of the Secretary of State of Canada
Department of the Solicitor General
Department of Transport
Treasury Board
Department of Veterans Affairs

SCHEDULE B

DEPARTMENTAL CORPORATIONS

Authorized by the Financial Administration Act (SC 1951 (2nd Session) ch. 12; RSC 1970, ch. F 10); and amended by the Governor in Council pursuant to section 66 of the FA Act. This listing also includes changes resulting from other legislation. Names deleted from this list may be found in the list of "Deletions" at the end of this Circular.

The appropriate Minister for purposes of the FA Act is the Minister so designated pursuant to section 2 of the FA Act. Where no "appropriate Minister" is shown below, no designation has been made or the designation has been rendered ineffective by subsequent legislation.

	Included in Schedule by:	"Appropriate Minister" & Designating Order
Agricultural Stabilization Board	FA Act, SC 1951 (2nd Sess) ch. 12 Agric. Stab. Act, SC 1957-8 ch. 22 FA Act, RSC 1970, ch. F-10	Agriculture P.C. 1903, 31-3-52
Atomic Energy Control Board	FA Act, SC 1951 (2nd Sess) ch. 12 FA Act, RSC 1970, ch. F-10	Energy, Mines & Resources P.C. 1969-2001, 15-10-69 SOR/69-529
Canada Employment and Immigration Commission	FA Act, SC 1951 (2nd Sess) ch. 12 FA Act, RSC 1970, ch. F-10 SC 1976-77, ch. 54 (7,68,71)	Employment and Immigration P.C. 1903, 31-3-52 SC 1976-77, ch. 54 (26,68,
Director of Soldier Settlement	FA Act, SC 1951 (2nd Sess) ch. 12 FA Act, RSC 1970, ch. F-10	Veterans Affairs P.C. 1903, 31-3-52
The Director, The Veterans' Land Act	FA Act, SC 1951 (2nd Sess) ch. 12 FA Act, RSC 1970, ch. F-10	Veterans Affairs P.C. 1903, 31-3-52
Economic Council of Canada	P.C. 1963-1600, 31-10-63 SOR/63-431 FA Act, RSC 1970, ch. F-10	Prime Minister P.C. 1965-2288, 22-12-65
Fisheries Prices Support Board	FA Act, SC 1951 (2nd Sess) ch. 12 FA Act, RSC 1970, ch. F-10	

SCHEDULE B (continued)

	Included in Schedule by:	"Appropriate Minister" & Designating Order
Medical Research Council	P.C. 1969-1027, 20-5-69 SOR/69-257 FA Act, RSC 1970, ch. F-10	National Health & Welfare P.C. 1968-1709, 30-8-68
Municipal Development and Loan Board	P.C. 1963-1593, 31-10-63 SOR/63-430 FA Act, RSC 1970, ch. F-10	Finance P.C. 1963-1210, 14-8-63
National Museums of Canada	P.C. 1968-727, 17-4-68 SOR/68-151 FA Act, RSC 1970, ch. F-10	Secretary of State P.C. 1968-521, 19-3-68
National Research Council of Canada	FA Act, SC 1951 (2nd Sess) ch. 12 FA Act, RSC 1970, ch. F-10	Chairman of the Committee of the Privy Council on Scientific and Industrial Research P.C. 1963-773, 23-5-63
Natural Sciences and Engineering Research Council	P.C. 1978-1336, 20-4-78 SOR/78-378, 24-4-78	
Science Council of Canada	P.C. 1969-1225, 17-6-69 SOR/69-305 FA Act, RSC 1970, ch. F-10	Prime Minister P.C. 1966-935, 24-5-66
Social Sciences and Humanities Research Council	P.C. 1978-909, 23-3-78 SOR/78-285, 28-3-78	Secretary of State P.C. 1978-884, 23-3-78 SI/78-63, 12-4-78

Pollution Prevention Order 110800 – Richmond Steel Recycling Ltd.

From: Environmental Compliance ENV:EX <environmentalcompliance@gov.bc.ca>
To: skynoch@richmondsteel.ca, HDhillon@richmondsteel.ca
Cc: Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>, Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>, Compliance Admin ENV:EX <Compliance.Admin@gov.bc.ca>, Karl.Gustafson@mcmillan.ca, McCammon, Alan W ENV:EX <Alan.Mccammon@gov.bc.ca>, Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>, Gregory.lee3@canada.ca, WMills@richmond.ca
Sent: August 5, 2021 11:33:06 AM PDT
Attachments: Declaration of Competency.pdf, image003.jpg, image005.jpg, image006.jpg, image001.png, 2021-08-05 Pollution Prevention Order 110800 Richmond Steel_Signed.pdf, Conflict of Interest Disclosure.pdf

Good morning,

On behalf of Daniel P. Bings, Compliance Operations Manager, Regional Operations Branch, Environmental Protection Division, with the Ministry of Environment and Climate Change Strategy, please see attached on the above-noted subject.

Please acknowledge receipt of this email by replying to this message (please "Reply All").

In doing so, you are confirming that you are able to read its contents and open all attachments. If you are not able to open the attachments, please indicate this immediately as this may affect legislated time limits that prescribe your rights and obligations.

Pollution Prevention Order 110800

Regards,



Gina Tamm, BBA | Compliance Coordinator

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on the TELUS Mobility Network or report the incident [online](#)

To report a spill call the Provincial Emergency Program at 1-800-663-3456

 @ComplianceBC More information about Environmental Compliance and how it is assessed can be found [here](#).



August 5, 2021

Order Number: 110800

Via email: skynoch@richmondsteel.ca and HDhillon@richmondsteel.ca

Richmond Steel Recycling Limited
11760 Mitchell Road
Richmond, BC V6V 1V8

Harbinder Dhillon
President
Richmond Steel Recycling Limited
11760 Mitchell Road
Richmond, BC V6V 1V8

Attention: Steven Kynoch and Harbinder Dhillon

Pollution Prevention Order – Richmond Steel Recycling Ltd.

This Order is being issued under Section 81 of the *Environmental Management Act* (EMA), SBC 2003, C. 53. I am satisfied on reasonable grounds that an activity at Richmond Steel Recycling Ltd. (Richmond Steel) located at 11760 Mitchell Road, Richmond, British Columbia is being performed by a person in a manner that is likely to release effluent that will cause pollution. Specifically, the Richmond Steel facility is located on the described land parcel:

Lot 8 Except Part Plan 49844 District Lot 459 Group 1 New Westminster
District Plan 47113

GROUND FOR ISSUANCE

I am satisfied that Harbinder Dhillon and Richmond Steel are persons who:

- previously had or now has possession, charge or control of the substance;
- previously did anything, or who is now doing anything, which may cause the release of the substance; or
- previously owned or occupied, or now owns or occupies, the land on which the substance is located.

The substance likely to be released in a manner that will cause pollution is effluent from a facility classified in the Waste Discharge Regulation Schedule I as a “Commercial Waste Management and/or Waste Disposal Industry” and/or “Hazardous Waste Management” and in Schedule II as a “Vehicle Dismantling and Recycling Industry”.

As per their Environmental Management Plan (2021) (EM Plan), Richmond Steel, “a joint venture between Sims Metal Management and Nucor Corporation, has been operating since the early 1970s, [with] the primary onsite operations including metal recycling, wet vehicle handling and recycling, mobile car crushing, industrial bin services, building demolishing, and maritime salvage”. As per their Drainage & Mitigation Plan (2021) (D&M Plan), all stormwater on the site is directed to the bioswale area and ditch which flows directly into the Fraser River.

On December 12, 2019, Environment and Climate Change Canada (ECCC) enforcement staff “witnessed a pool of sediment-laden water with a grey sheen on its surface... directly adjacent to the Fraser River...” and “witnessed sediment-laden water with a grey sheen flowing from the aforementioned pool of water towards the Fraser River and discharging directly into the Fraser River from the foreshore of the property”. ECCC staff further “witnessed a grey sheen spreading across the surface of the Fraser River, originating at the flow of water discharging from foreshore of the property” (ECCC Warning Letter).

ECCC staff collected samples “from the aforementioned flow of water into the Fraser River and from a treatment ditch on the East side of the property”, flowing into the Fraser River. These samples were analysed at the ECCC, Pacific & Yukon Laboratory for Environmental Testing and ECCC shared the results with the Ministry of Environment and Climate Change Strategy (Ministry). The results showed levels of aluminum, copper, zinc, polychlorinated biphenyl (Arochlor-1242), naphthalene, benz(a)anthracenes, and pyrene to be above British Columbia Water Quality Guidelines (BCWQG), as listed in the summary table below (Table 1):

Table 1: Summary Table of ECCC samples collected on December 12, 2019. (Grey highlights indicate values either below BCWQG or between phototoxic and non-phototoxic). Source: 2020-01-28 V19L036_1 Detailed ECCC Results

Parameter	ECCC Results Bioswale	ECCC Results Shore/Dock	BCWQG
COD	506 mg/L	472 mg/L	
TSS	271 mg/L	2170 mg/L	
Aluminum (dissolved)	0.11 mg/L	0.12 mg/L	0.1 Acute mg/L 0.05 Chronic mg/L
Copper dissolved (mg/L)	0.45 mg/L (pH 7.3, Hardness 130, DOC 10*) *mid-range estimate for DOC	0.010 mg/L (pH 7.9, Hardness 150, DOC 10*) *mid-range estimate for DOC	0.0179 Acute mg/L 0.00298 Chronic mg/L 0.0348 Acute mg/L 0.00594 Chronic mg/L
Zinc, total (mg/L)	2.46 mg/L	14.6 mg/L	0.063 Acute mg/L 0.0375 Chronic mg/L
PCB, total (µg/L)	10.1 µg/L = 10100 ng/L	20.8 µg/L = 20800 ng/L	0.1 ng/L Acute (HWR = 0.005 mg/L = 5000ng/L)
Naphthalene (ug/L)	4.97 µg/L	0.52 µg/L	1 µg/L
Benz(a)anthracenes (ug/L)	0.44 µg/L	0.49 µg/L	0.1 µg/L Chronic
Fluoranthene	0.65 µg/L	1.12 µg/L	0.2 µg/L Phototoxic 4 µg/L Non-phototoxic
Pyrene	0.70 µg/L	1.14 µg/L	0.02 µg/L Chronic

In response to ECCC's findings, "RSR retained Pottinger Gaherty Environmental Consultants Ltd. (PGL) to develop a Stormwater Management and Mitigation Plan (the Stormwater Plan) [that] included undertaking additional investigation of site conditions to help inform RSR's decisions as to the steps required to manage stormwater effectively" (Update Letter, March 15, 2021).

In May 2021, Richmond Steel submitted updated D&M and EM Plans. Neither documents include sampling specifics or analytical results and neither documents propose an on-going sampling, monitoring, and reporting schedule (D&M Plan, 2021 and EM Plan, 2021).

On July 2, 2020, Ministry staff conducted an inspection of the Richmond Steel facility and assessed compliance with the Hazardous Waste Regulation (HWR), Section 17(1)(b), as not-determined because facility staff were unable to locate sample records. Richmond Steel staff later reported in a July 15, 2020, email that they "did not find any reports or records of a storm water sampling program". The inspection report concludes that "there were no sample records".

On April 26, 2021, Ministry staff again requested the sampling records to demonstrate compliance with HWR, Section 17(1)(b), and no records were provided. In direct response to the issue of HWR, Section 17(1)(b) records, Richmond Steel stated in a May 7, 2021, email – Compliance Advisory Table that "Richmond Steel Recycling is not a Hazardous Waste Storage facility", but do acknowledge in that same email that 'Sch. 1.2 does apply to the discharge' (email, May 7, 2021).

On March 23, 2021, in an update letter to the City of Richmond, Mr. Keith Gagne, P.Eng, of PGL Environmental Consultants suggests that potential pollution is ubiquitous throughout the site and is on-going "PCBs were non-detect (N.D.) in the soil samples; however, surface water throughout the Site exceeded BC Water Quality Guidelines. RSR was unable to isolate the PCB impacts to one area. it appears that the low levels of PCBs are likely related to ongoing activities, regardless of the controls RSR has or might reasonably put in place to prevent PCB materials from entering the Site."

Based on this information, I am satisfied on reasonable grounds that this activity/operation is being performed in a manner that is likely to release a substance that will cause pollution.

ORDER

Pursuant to Section 81 of the *Environmental Management Act* [SBC 2003] Chapter 53, Richmond Steel is hereby ordered to comply with the required actions listed in the table below and to provide information to the Director indicating the completion of each action.

Item	Required Action	Required by midnight on:
1.	Retain a Qualified Professional to develop a Waste Characterization Plan (Plan). This Plan must include details of how and when Richmond Steel will:	August 26, 2021

Item	Required Action	Required by midnight on:
	<ul style="list-style-type: none"> a) Identify Contaminants of Potential Concern (COPC), including but not limited to metals, PCBs, PAHs – alkylated and non-alkylated, TSS, pH, hardness, COD in effluent throughout the site and in the oil/water separator discharge; b) Identify the source of COPC entering effluent and the activities on site responsible for the source; and c) Obtain laboratory analysis to support the assessments above and compare the results to both the British Columbia Water Quality Guidelines and the Hazardous Waste Regulation Schedule 1.2 criteria. 	
2.	Submit the Plan for approval to the Director.	September 16, 2021
3.	Implement the Approved Plan within two weeks of receiving Director's Approval.	
4.	<p>Submit a report detailing the findings from the Plan. The report must include:</p> <ul style="list-style-type: none"> a) Laboratory analysis raw and summary data described in the Waste Characterization Plan; b) Interpretation of the analysis described in the Plan and the conclusions reached; c) Rationale explaining how the location, sampling method and frequency, and results support the conclusions reached; d) Recommendations for mitigation measures that would prevent any further escape of contaminants; and e) Certification by a Qualified Professional. 	January 12, 2022
5.	<p>Submit the following documents to the Ministry:</p> <p>The report(s), data and/or information, including location and results of all samples of any media taken in order to develop the first and any subsequent versions of the Stormwater Drainage and Mitigation Plan (including Drainage and Mitigation Plan Development Strategy, 2020 and 2021) commissioned from PGL Consultants or any other consultants, by Richmond Steel in response to the detection of PCB contamination by Environment Canada in December 2019. These include, but are not limited to:</p> <ul style="list-style-type: none"> a) results of all analysis completed on soil sampling in unpaved areas (soil sampled by advancing soil pits), b) results of all analysis on surface water samples collected throughout the Site, c) results on auto-shredder residual samples, and 	September 2, 2021

Item	Required Action	Required by midnight on:
	d) sampling plan and method(s), results, interpretation, and a rationale for conclusions reached.	
6.	<p>Submit the following additional documents to the Ministry:</p> <ul style="list-style-type: none"> a) Reports, results and assessments regarding environmental quality status of effluent/stormwater on the site, that Richmond Steel, their consultants or agents, have or have requested. b) Laboratory analysis for the contaminants of concern identified by a qualified professional, interpreted and compared to the British Columbia Water Quality Guidelines and the Hazardous Waste Regulation Schedule 1.2 for the period June 2019 to July 2021. c) Records of the oil/water separator maintenance and cleaning schedule and manifests detailing the management of the residual wastes associated with this activity. d) Records documenting work already completed on the ditch/bio-swale (including but not limited to analytical results, photographs, professional interpretations and reports). 	September 2, 2021
7.	<p>Monthly reporting:</p> <p>By the 10th of each month, Richmond Steel must provide and update of activities from the month previous. These monthly updates must include a summary of activities completed towards complying with requirements 1 through 6 of the order.</p> <p>This requirement will remain in place until this Order is cancelled by the Director.</p>	On the 10 th day of every month starting on August 10, 2021
8.	The qualified professional(s) performing any of the following in response to this order: performing work, authoring reports, authoring the Waste Characterization Plan and Report and/or providing opinions must complete and submit the attached Declaration of Competency and Conflict of Interest Disclosure Statement forms.	First QP submission of past, current or future work

For the purposes of this Order, the following definition applies:

"Qualified Professional" means an applied scientist or technologist specializing in a particular applied science or technology, including agrology, biology, chemistry, engineering, geology or hydrogeology, who (a) is registered in British Columbia with the professional organization responsible for his or her area of expertise, acting under that professional association's code of ethics and subject to disciplinary action by that association, and (b) through suitable education, experience, accreditation and knowledge, may be reasonably relied on to provide advice within his or her area of expertise as it relates to this order, or (c) is approved by the Director.

DUTY TO COMPLY

The requirements above must be completed on or before the associated “Required By” date. Failure to comply with the requirements of this order is a contravention of the *Environmental Management Act* [SBC 2003, c.53] and may result in legal action. I direct your attention to Section 120(10) of the *Environmental Management Act*, which reads:

“(10) A person who contravenes an order...that is given, made or imposed under this Act by a ...director...commits an offence and is liable on conviction to a fine not exceeding \$300 000 or imprisonment for not more than 6 months, or both.”

Failure to comply with the requirements of this order may also result in an administrative penalty under the Administrative Penalties Regulation (*Environmental Management Act*) [B.C. Reg 133/2014] (Regulation). I direct your attention to Section 12(4) of the Regulation, which reads:

“(4) A person who fails to comply with an order under the [Environmental Management] Act is liable to an administrative penalty not exceeding \$40,000.”

RIGHT TO APPEAL

This decision may be appealed to the Environmental Appeal Board in accordance with Part 8 of the *Environmental Management Act*. An appeal must be delivered within 30 days from the date notice of this order is given. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

NOTIFICATION OF PUBLICATION

The Party is notified that the Province intends to publish on the Ministry of Environment website the entirety of any Regulatory Document provided that:

- a) The Province will provide written notice to the party of its intent to publish the Regulatory Documents at least [14] days prior to publication;
- b) The Province will not publish any information what could not, if it were subject to a request under section 5 FOIPPA, be disclosed under the Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. 165 as amended from time to time.

This order will also appear in the Ministry of Environment’s Quarterly Environmental Enforcement Summary and Environmental Violations Database.

MINISTRY CONTACT

If you have any questions, please contact the undersigned at Dan.Bings@gov.bc.ca or Environmental Protection Officer Oana Enick at 236-468-2231 and Oana.Enick@gov.bc.ca.

Regards,



Daniel P. Bings
for Director, *Environmental Management Act*
Compliance Operations Manager

Attachments:

QP declaration of competency form
QP conflict of interest disclosure statement

cc:

Alan W. McCammon, MSc, PGeo
Manager, Remediation Assurance and Brownfields
BC Ministry of Environment & Climate Change Strategy
Suite 200 – 10470 152nd Street, Surrey, BC, V3R 0Y3
Alan.Mccammon@gov.bc.ca

Catherine Allard
Senior Authorizations Officer, South Coast Regional Office
Ministry of Forests, Lands & Natural Resources Operations and Rural Development
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Gregory Lee
Inspector and Fishery Officer, Environmental Enforcement Directorate
Enforcement Branch, Environment and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street, Vancouver, BC, V6C 3S5
Gregory.lee3@canada.ca

Warren Mills
Environmental Coordinator
6911 No. 3 Road, Richmond, BC V6Y 2C1
wmills@richmond.ca

2021-08-10 Amended Pollution Prevention Order 110800

From: Environmental Compliance ENV:EX
To: skynoch@richmondsteel.ca, HDhillon@richmondsteel.ca
Cc: Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>, Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>, Compliance Admin ENV:EX <Compliance.Admin@gov.bc.ca>, Karl.Gustafson@mcmillan.ca, McCammon, Alan W ENV:EX <Alan.Mccammon@gov.bc.ca>, Catherine.Allard@gov.bc.ca, Gregory.lee3@canada.ca, WMills@richmond.ca
Sent: August 10, 2021 11:07:30 AM PDT
Attachments: image001.png, Conflict of Interest Disclosure.pdf, image002.jpg, image004.jpg, image003.jpg, Declaration of Competency.pdf, 2021-08-10 Pollution Prevention Order 110800 Richmond Steel_Signed.pdf

Good morning,

On behalf of Daniel P. Bings, Compliance Operations Manager, Regional Operations Branch, Environmental Protection Division, with the Ministry of Environment and Climate Change Strategy, please see attached on the above-noted subject.

Please acknowledge receipt of this email by replying to this message (please "Reply All").

In doing so, you are confirming that you are able to read its contents and open all attachments. If you are not able to open the attachments, please indicate this immediately as this may affect legislated time limits that prescribe your rights and obligations.

Pollution Prevention Order 110800

Mr. Gustafson,

To address your queries:

- a. Mr. Bings is a delegated Director under the *Environmental Management Act*, and as such is the Statutory Decision Maker (SDM) of this Pollution Prevention Order (PPO);
- b. For all PPO reporting requirements and information please address to environmentalcompliance@gov.bc.ca and cc' both Dan.Bings@gov.bc.ca and Oana.Enick@gov.bc.ca;
- c. As per your concerns, reporting requirement item number 7 of the PPO has been amended from August 10, 2021, to September 10, 2021, as the commencement date for the monthly reporting.

Regards,



Gina Tamm, BBA | Compliance Coordinator

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy

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To report a spill call the Provincial Emergency Program at 1-800-663-3456

 @ComplianceBC More information about Environmental Compliance and how it is assessed can be found [here](#).

Conflict of Interest Disclosure Statement

A qualified professional ¹ providing services to either the Ministry of Environment and Climate Change Strategy ("ministry"), or to a regulated person for the purpose of obtaining an authorization from the ministry, or pursuant to a requirement imposed under the *Environmental Management Act*, the *Integrated Pest Management Act* or the *Park Act* has a real or perceived conflict of interest when the qualified professional, or their relatives, close associates or personal friends have a financial or other interest in the outcome of the work being performed.

A real or perceived conflict of interest occurs when a qualified professional has

- a) an ownership interest in the regulated person's business;
- b) an opportunity to influence a decision that leads to financial benefits from the regulated person or their business other than a standard fee for service (e.g. bonuses, stock options, other profit sharing arrangements);
- c) a personal or professional interest in a specific outcome;
- d) the promise of a long term or ongoing business relationship with the regulated person, that is contingent upon a specific outcome of work;
- e) a spouse or other family member who will benefit from a specific outcome; or
- f) any other interest that could be perceived as a threat to the independence or objectivity of the qualified professional in performing a duty or function.

Qualified professionals who work under ministry legislation must take care in the conduct of their work that potential conflicts of interest within their control are avoided or mitigated. Precise rules in conflict of interest are not possible and professionals must rely on guidance of their professional associations, their common sense, conscience and sense of personal integrity.

Declaration

I Print First and Last Name , as a member of Print Name of Professional Association
declare

Select one of the following:

- ☐ Absence from conflict of interest

Other than the standard fee I will receive for my professional services, I have no financial or other interest in the outcome of this application/project/work/etc. .

I further declare that should a conflict of interest arise in the future during the course of this work, I will fully disclose the circumstances in writing and without delay to Insert Ministry Contact Name , erring on the side of caution.

☐ Real or perceived conflict of interest

Description and nature of conflict(s):

I will maintain my objectivity, conducting my work in accordance with my Code of Ethics and standards of practice.

In addition, I will take the following steps to mitigate the real or perceived conflict(s) I have disclosed, to ensure the public interest remains paramount:

Further, I acknowledge that this disclosure may be interpreted as a threat to my independence and will be considered by the statutory decision maker accordingly.

This conflict of interest disclosure statement is collected under section 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of increasing government transparency and ensuring professional ethics and accountability. By signing and submitting this statement you consent to its publication and its disclosure outside of Canada. This consent is valid from the date submitted and cannot be revoked. If you have any questions about the collection, use or disclosure of your personal information please contact the Ministry of Environment and Climate Change Strategy Headquarters Office at 1-800-663-7867.

Signature:

X _____

Print name: _____

Date: _____

Witnessed by:

X _____

Print name: _____

¹Qualified Professional, in relation to a duty or function under ministry legislation, means an individual who

- a) is registered in British Columbia with a professional association, is acting under that organization's code of ethics, and is subject to disciplinary action by that association, and
- b) through suitable education, experience, accreditation and knowledge, may reasonably be relied on to provide advice within his or her area of expertise, which area of expertise is applicable to the duty or function.

Declaration of Competency

The Ministry of Environment and Climate Change Strategy relies on the work, advice, recommendations and in some cases decision making of qualified professionals¹, under government's professional reliance regime. With this comes an assumption that professionals who undertake work in relation to ministry legislation, regulations and codes of practice have the knowledge, experience and objectivity necessary to fulfill this role.

1. Name of Qualified Professional _____
Title _____

2. Are you a registered member of a professional association in B.C.? ☐ Yes ☐ No

Name of Association: _____ Registration # _____

3. Brief description of professional services:

This declaration of competency is collected under section 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of increasing government transparency and ensuring professional ethics and accountability. By signing and submitting this statement you consent to its publication and its disclosure outside of Canada. This consent is valid from the date submitted and cannot be revoked. If you have any questions about the collection, use or disclosure of your personal information please contact the Ministry of Environment and Climate Change Strategy Headquarters Office at 1-800-663-7867.

Declaration

I am a qualified professional with the knowledge, skills and experience to provide expert information, advice and/or recommendations in relation to the specific work described above.

Signature:

Witnessed by:

X _____

X _____

Print Name: _____

Print Name: _____

Date signed: _____

¹ *Qualified Professional, in relation to a duty or function under ministry legislation, means an individual who*

- a) *is registered in British Columbia with a professional association, is acting under that organization's code of ethics, and is subject to disciplinary action by that association, and*
- b) *through suitable education, experience, accreditation and knowledge, may reasonably be relied on to provide advice within his or her area of expertise, which area of expertise is applicable to the duty or function.*



August 10, 2021

Order Number: 110800

Via email: skynoch@richmondsteel.ca and HDhillon@richmondsteel.ca

Richmond Steel Recycling Limited
11760 Mitchell Road
Richmond, BC V6V 1V8

Harbinder Dhillon
President
Richmond Steel Recycling Limited
11760 Mitchell Road
Richmond, BC V6V 1V8

Attention: Steven Kynoch and Harbinder Dhillon

Pollution Prevention Order – Richmond Steel Recycling Ltd.

This Order is being issued under Section 81 of the *Environmental Management Act* (EMA), SBC 2003, C. 53. I am satisfied on reasonable grounds that an activity at Richmond Steel Recycling Ltd. (Richmond Steel) located at 11760 Mitchell Road, Richmond, British Columbia is being performed by a person in a manner that is likely to release effluent that will cause pollution. Specifically, the Richmond Steel facility is located on the described land parcel:

Lot 8 Except Part Plan 49844 District Lot 459 Group 1 New Westminster
District Plan 47113

GROUND FOR ISSUANCE

I am satisfied that Harbinder Dhillon and Richmond Steel are persons who:

- previously had or now has possession, charge or control of the substance;
- previously did anything, or who is now doing anything, which may cause the release of the substance; or
- previously owned or occupied, or now owns or occupies, the land on which the substance is located.

The substance likely to be released in a manner that will cause pollution is effluent from a facility classified in the Waste Discharge Regulation Schedule I as a “Commercial Waste Management and/or Waste Disposal Industry” and/or “Hazardous Waste Management” and in Schedule II as a “Vehicle Dismantling and Recycling Industry”.

As per their Environmental Management Plan (2021) (EM Plan), Richmond Steel, “a joint venture between Sims Metal Management and Nucor Corporation, has been operating since the early 1970s, [with] the primary onsite operations including metal recycling, wet vehicle handling and recycling, mobile car crushing, industrial bin services, building demolishing, and maritime salvage”. As per their Drainage & Mitigation Plan (2021) (D&M Plan), all stormwater on the site is directed to the bioswale area and ditch which flows directly into the Fraser River.

On December 12, 2019, Environment and Climate Change Canada (ECCC) enforcement staff “witnessed a pool of sediment-laden water with a grey sheen on its surface... directly adjacent to the Fraser River...” and “witnessed sediment-laden water with a grey sheen flowing from the aforementioned pool of water towards the Fraser River and discharging directly into the Fraser River from the foreshore of the property”. ECCC staff further “witnessed a grey sheen spreading across the surface of the Fraser River, originating at the flow of water discharging from foreshore of the property” (ECCC Warning Letter).

ECCC staff collected samples “from the aforementioned flow of water into the Fraser River and from a treatment ditch on the East side of the property”, flowing into the Fraser River. These samples were analysed at the ECCC, Pacific & Yukon Laboratory for Environmental Testing and ECCC shared the results with the Ministry of Environment and Climate Change Strategy (Ministry). The results showed levels of aluminum, copper, zinc, polychlorinated biphenyl (Arochlor-1242), naphthalene, benz(a)anthracenes, and pyrene to be above British Columbia Water Quality Guidelines (BCWQG), as listed in the summary table below (Table 1):

Table 1: Summary Table of ECCC samples collected on December 12, 2019. (Grey highlights indicate values either below BCWQG or between phototoxic and non-phototoxic). Source: 2020-01-28 V19L036_1 Detailed ECCC Results

Parameter	ECCC Results Bioswale	ECCC Results Shore/Dock	BCWQG
COD	506 mg/L	472 mg/L	
TSS	271 mg/L	2170 mg/L	
Aluminum (dissolved)	0.11 mg/L	0.12 mg/L	0.1 Acute mg/L 0.05 Chronic mg/L
Copper dissolved (mg/L)	0.45 mg/L (pH 7.3, Hardness 130, DOC 10*) *mid-range estimate for DOC	0.010 mg/L (pH 7.9, Hardness 150, DOC 10*) *mid-range estimate for DOC	0.0179 Acute mg/L 0.00298 Chronic mg/L 0.0348 Acute mg/L 0.00594 Chronic mg/L
Zinc, total (mg/L)	2.46 mg/L	14.6 mg/L	0.063 Acute mg/L 0.0375 Chronic mg/L
PCB, total (µg/L)	10.1 µg/L = 10100 ng/L	20.8 µg/L = 20800 ng/L	0.1 ng/L Acute (HWR = 0.005 mg/L = 5000ng/L)
Naphthalene (ug/L)	4.97 µg/L	0.52 µg/L	1 µg/L
Benz(a)anthracenes (ug/L)	0.44 µg/L	0.49 µg/L	0.1 µg/L Chronic
Fluoranthene	0.65 µg/L	1.12 µg/L	0.2 µg/L Phototoxic 4 µg/L Non-phototoxic
Pyrene	0.70 µg/L	1.14 µg/L	0.02 µg/L Chronic

In response to ECCC's findings, *"RSR retained Pottinger Gaherty Environmental Consultants Ltd. (PGL) to develop a Stormwater Management and Mitigation Plan (the Stormwater Plan) [that] included undertaking additional investigation of site conditions to help inform RSR's decisions as to the steps required to manage stormwater effectively"* (Update Letter, March 15, 2021).

In May 2021, Richmond Steel submitted updated D&M and EM Plans. Neither documents include sampling specifics or analytical results and neither documents propose an on-going sampling, monitoring, and reporting schedule (D&M Plan, 2021 and EM Plan, 2021).

On July 2, 2020, Ministry staff conducted an inspection of the Richmond Steel facility and assessed compliance with the Hazardous Waste Regulation (HWR), Section 17(1)(b), as not-determined because facility staff were unable to locate sample records. Richmond Steel staff later reported in a July 15, 2020, email that they *"did not find any reports or records of a storm water sampling program"*. The inspection report concludes that *"there were no sample records"*.

On April 26, 2021, Ministry staff again requested the sampling records to demonstrate compliance with HWR, Section 17(1)(b), and no records were provided. In direct response to the issue of HWR, Section 17(1)(b) records, Richmond Steel stated in a May 7, 2021, email – Compliance Advisory Table that *"Richmond Steel Recycling is not a Hazardous Waste Storage facility"*, but do acknowledge in that same email that *'Sch. 1.2 does apply to the discharge'* (email, May 7, 2021).

On March 23, 2021, in an update letter to the City of Richmond, Mr. Keith Gagne, P.Eng, of PGL Environmental Consultants suggests that potential pollution is ubiquitous throughout the site and is on-going *"PCBs were non-detect (N.D.) in the soil samples; however, surface water throughout the Site exceeded BC Water Quality Guidelines. RSR was unable to isolate the PCB impacts to one area. it appears that the low levels of PCBs are likely related to ongoing activities, regardless of the controls RSR has or might reasonably put in place to prevent PCB materials from entering the Site."*

Based on this information, I am satisfied on reasonable grounds that this activity/operation is being performed in a manner that is likely to release a substance that will cause pollution.

ORDER

Pursuant to Section 81 of the *Environmental Management Act* [SBC 2003] Chapter 53, Richmond Steel is hereby ordered to comply with the required actions listed in the table below and to provide information to the Director indicating the completion of each action.

Item	Required Action	Required by midnight on:
1.	Retain a Qualified Professional to develop a Waste Characterization Plan (Plan). This Plan must include details of how and when Richmond Steel will:	August 26, 2021

Item	Required Action	Required by midnight on:
	<ul style="list-style-type: none"> a) Identify Contaminants of Potential Concern (COPC), including but not limited to metals, PCBs, PAHs – alkylated and non-alkylated, TSS, pH, hardness, COD in effluent throughout the site and in the oil/water separator discharge; b) Identify the source of COPC entering effluent and the activities on site responsible for the source; and c) Obtain laboratory analysis to support the assessments above and compare the results to both the British Columbia Water Quality Guidelines and the Hazardous Waste Regulation Schedule 1.2 criteria. 	
2.	Submit the Plan for approval to the Director.	September 16, 2021
3.	Implement the Approved Plan within two weeks of receiving Director's Approval.	
4.	<p>Submit a report detailing the findings from the Plan. The report must include:</p> <ul style="list-style-type: none"> a) Laboratory analysis raw and summary data described in the Waste Characterization Plan; b) Interpretation of the analysis described in the Plan and the conclusions reached; c) Rationale explaining how the location, sampling method and frequency, and results support the conclusions reached; d) Recommendations for mitigation measures that would prevent any further escape of contaminants; and e) Certification by a Qualified Professional. 	January 12, 2022
5.	<p>Submit the following documents to the Ministry:</p> <p>The report(s), data and/or information, including location and results of all samples of any media taken in order to develop the first and any subsequent versions of the Stormwater Drainage and Mitigation Plan (including Drainage and Mitigation Plan Development Strategy, 2020 and 2021) commissioned from PGL Consultants or any other consultants, by Richmond Steel in response to the detection of PCB contamination by Environment Canada in December 2019. These include, but are not limited to:</p> <ul style="list-style-type: none"> a) results of all analysis completed on soil sampling in unpaved areas (soil sampled by advancing soil pits), b) results of all analysis on surface water samples collected throughout the Site, c) results on auto-shredder residual samples, and 	September 2, 2021

Item	Required Action	Required by midnight on:
	d) sampling plan and method(s), results, interpretation, and a rationale for conclusions reached.	
6.	Submit the following additional documents to the Ministry: <ul style="list-style-type: none"> a) Reports, results and assessments regarding environmental quality status of effluent/stormwater on the site, that Richmond Steel, their consultants or agents, have or have requested. b) Laboratory analysis for the contaminants of concern identified by a qualified professional, interpreted and compared to the British Columbia Water Quality Guidelines and the Hazardous Waste Regulation Schedule 1.2 for the period June 2019 to July 2021. c) Records of the oil/water separator maintenance and cleaning schedule and manifests detailing the management of the residual wastes associated with this activity. d) Records documenting work already completed on the ditch/bio-swale (including but not limited to analytical results, photographs, professional interpretations and reports). 	September 2, 2021
7.	Monthly reporting: By the 10 th of each month, Richmond Steel must provide and update of activities from the month previous. These monthly updates must include a summary of activities completed towards complying with requirements 1 through 6 of the order. This requirement will remain in place until this Order is cancelled by the Director.	On the 10 th day of every month starting on September 10, 2021
8.	The qualified professional(s) performing any of the following in response to this order: performing work, authoring reports, authoring the Waste Characterization Plan and Report and/or providing opinions must complete and submit the attached Declaration of Competency and Conflict of Interest Disclosure Statement forms.	First QP submission of past, current or future work

For the purposes of this Order, the following definition applies:

"Qualified Professional" means an applied scientist or technologist specializing in a particular applied science or technology, including agrology, biology, chemistry, engineering, geology or hydrogeology, who (a) is registered in British Columbia with the professional organization responsible for his or her area of expertise, acting under that professional association's code of ethics and subject to disciplinary action by that association, and (b) through suitable education, experience, accreditation and knowledge, may be reasonably relied on to provide advice within his or her area of expertise as it relates to this order, or (c) is approved by the Director.

DUTY TO COMPLY

The requirements above must be completed on or before the associated “Required By” date. Failure to comply with the requirements of this order is a contravention of the *Environmental Management Act* [SBC 2003, c.53] and may result in legal action. I direct your attention to Section 120(10) of the *Environmental Management Act*, which reads:

“(10) A person who contravenes an order...that is given, made or imposed under this Act by a ...director...commits an offence and is liable on conviction to a fine not exceeding \$300 000 or imprisonment for not more than 6 months, or both.”

Failure to comply with the requirements of this order may also result in an administrative penalty under the Administrative Penalties Regulation (*Environmental Management Act*) [B.C. Reg 133/2014] (Regulation). I direct your attention to Section 12(4) of the Regulation, which reads:

“(4) A person who fails to comply with an order under the [Environmental Management] Act is liable to an administrative penalty not exceeding \$40,000.”

RIGHT TO APPEAL

This decision may be appealed to the Environmental Appeal Board in accordance with Part 8 of the *Environmental Management Act*. An appeal must be delivered within 30 days from the date notice of this order is given. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

NOTIFICATION OF PUBLICATION

The Party is notified that the Province intends to publish on the Ministry of Environment website the entirety of any Regulatory Document provided that:

- a) The Province will provide written notice to the party of its intent to publish the Regulatory Documents at least [14] days prior to publication;
- b) The Province will not publish any information what could not, if it were subject to a request under section 5 FOIPPA, be disclosed under the Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. 165 as amended from time to time.

This order will also appear in the Ministry of Environment’s Quarterly Environmental Enforcement Summary and Environmental Violations Database.

MINISTRY CONTACT

If you have any questions, please contact the undersigned at Dan.Bings@gov.bc.ca or Environmental Protection Officer Oana Enick at 236-468-2231 and Oana.Enick@gov.bc.ca.

Regards,



Daniel P. Bings
for Director, *Environmental Management Act*
Compliance Operations Manager

Attachments:

QP declaration of competency form
QP conflict of interest disclosure statement

cc:

Alan W. McCammon, MSc, PGeo
Manager, Remediation Assurance and Brownfields
BC Ministry of Environment & Climate Change Strategy
Suite 200 – 10470 152nd Street, Surrey, BC, V3R 0Y3
Alan.Mccammon@gov.bc.ca

Catherine Allard
Senior Authorizations Officer, South Coast Regional Office
Ministry of Forests, Lands & Natural Resources Operations and Rural Development
Suite 200 – 10428 153 Street, Surrey, BC V3R 1E1
Catherine.Allard@gov.bc.ca

Gregory Lee
Inspector and Fishery Officer, Environmental Enforcement Directorate
Enforcement Branch, Environment and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street, Vancouver, BC, V6C 3S5
Gregory.lee3@canada.ca

Warren Mills
Environmental Coordinator
6911 No. 3 Road, Richmond, BC V6Y 2C1
wmills@richmond.ca

Richmond Steel Update

From: Enick, Oana V ENV:EX
To: Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>
Sent: September 23, 2021 2:43:59 PM PDT
Attachments: image002.jpg, image003.jpg, image004.jpg, image001.png
Hi Greg:

I just connected with colleagues from FLNRORD (the Ministry of Multiple Letters) who are working on the tenure aspect of this. The tenure on that land is expired and they are looking to extend it.

However, we will be working together and after checking internally, I can share documents with you as well, so I will resend the monthly meeting we have (sorry I missed it about half hour ago), to all of us.

Hope things are better with you. Take care and please call (778-886-7935) if you need anything.

Thanks, Oana.

PS: For some reason, I could not find those EC sediment PCB results. Can you please re-send?



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

RE: Richmond Steel Update

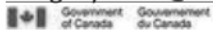
From: Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: September 24, 2021 9:53:51 AM PDT
Attachments: image005.jpg, image007.jpg, image008.jpg, image009.jpg, image006.png, V21G010_1 Summary 2021 08 26 1614.pdf

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Oana,

Here are the results you mentioned. Also that sounds great that FLNRORD is involved.

Gregory.Lee3@Canada.ca | Cell: 604-404-2482



From: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: September 23, 2021 2:44 PM
To: Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>
Subject: Richmond Steel Update

Hi Greg:

I just connected with colleagues from FLNRORD (the Ministry of Multiple Letters) who are working on the tenure aspect of this. The tenure on that land is expired and they are looking to extend it.

However, we will be working together and after checking internally, I can share documents with you as well, so I will resend the monthly meeting we have (sorry I missed it about half hour ago), to all of us.

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Thanks, Oana.

PS: For some reason, I could not find those EC sediment PCB results. Can you please re-send?



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

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 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

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Report of Analysis

983-Coastal District Env Enforcement 2021-22

KJ Sadler
Enforcement
Environmental Enforcement
Pacific and Yukon

201 - 401 Burrard St
Vancouver, BC
V6C 3R2

Work Order: V21G010

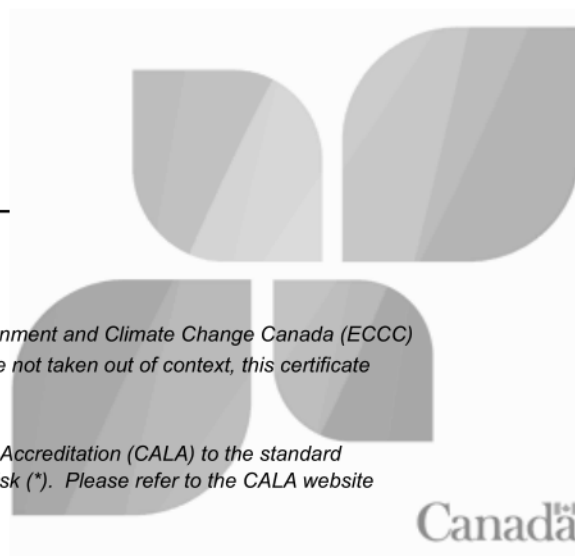
Reported: 2021-08-26
Printed: 2021-08-26

Authorization:

Laretta Liem For Graham van Aggelen
Manager, PYLET

The results reported pertain only to the samples as received and tested by the Environment and Climate Change Canada (ECCC) laboratory indicated in the report. To ensure that parts of this certificate of analysis are not taken out of context, this certificate shall not be reproduced, except in full, without approval of the laboratory.

These ECCC laboratories are accredited by the Canadian Association for Laboratory Accreditation (CALA) to the standard ISO/IEC 17025 for each of the reported analytes, except where indicated by an asterisk (). Please refer to the CALA website (www.cala.ca) to view the full Scope(s) of Accreditation.*



Page 098 of 282 to/à Page 117 of 282

Withheld pursuant to/removed as

Copyright

RE: Richmond Steel File

From: Mills, Warren <WMills@richmond.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: September 27, 2021 3:47:24 PM PDT

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Oana,
Your meeting is showing up as 25 hours long. Also, Sept 30th is a holiday.

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca

www.richmond.ca

-----Original Appointment-----

From: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>

Sent: September 24, 2021 12:14 PM

To: Enick, Oana V ENV:EX; Lee, Gregory (ECCC); Shutler, Graeme FLNR:EX; Semproni, Katie FLNR:EX; samantha.patterson2@canada.ca; Mills, Warren

Subject: Richmond Steel File

When: September 30, 2021 10:30 AM to October 1, 2021 11:30 AM (UTC-08:00) Pacific Time (US & Canada).

Where: Microsoft Teams Meeting

City of Richmond Security Warning: This email was sent from an external source outside the City. Please do not click or open attachments unless you recognize the source of this email and the content is safe.

To discuss Richmond Steel site on Mitchell Island.

Loose agenda:

1. Introductions and file status from each agency
2. New developments – from each agency
3. Next steps

Please let me know if you have a timing conflict and we need to find an alternate time.

Thanks, Oana.

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

[Learn More](#) | [Meeting options](#)

RE: How about Wednesdays? Richmond Steel File

From: Mills, Warren <WMills@richmond.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: September 28, 2021 4:01:45 PM PDT
Attachments: image005.jpg, image006.jpg, image007.jpg, image001.png

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

That works.

Warren Mills, B.Sc., E.P., P.Ag.

Environmental Coordinator

6911 No. 3 Road, Richmond, BC V6Y 2C1

T: 604-247-4694 | C: 778-836-2739 | E: wmills@richmond.ca

www.richmond.ca

From: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>

Sent: September 28, 2021 3:51 PM

To: Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>; Mills, Warren <WMills@richmond.ca>; Semproni, Katie FLNR:EX <Katie.Semproni@gov.bc.ca>; samantha.patterson2@canada.ca; Shutler, Graeme FLNR:EX <Graeme.Shutler@gov.bc.ca>

Subject: FW: How about Wednesdays? Richmond Steel File

City of Richmond Security Warning: This email was sent from an external source outside the City. Please do not click or open attachments unless you recognize the source of this email and the content is safe.

Hello everyone:

Graeme can't meet on Fridays. Since people are often away on Mondays, should we try for Wednesdays at 1:30 pm, starting next week? Please let me know and I will re-send the invitation. Thanks, Oana.



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)



@ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

-----Original Appointment-----

From: Shutler, Graeme FLNR:EX <Graeme.Shutler@gov.bc.ca>

Sent: September 28, 2021 12:13 PM

To: Enick, Oana V ENV:EX

Subject: Declined: Richmond Steel File

When: Occurs every 4 week(s) on Friday effective 2021-10-01 until 2022-02-18 from 10:30 AM to 11:30 AM (UTC-08:00) Pacific Time (US & Canada).

Where: Microsoft Teams Meeting

Hi Oana

s.22 . Not great days for me. Mondays and Wednesday are typically better for me as I have less recurring meetings on those days.

Thanks!

Metal and PCB Contamination at Richmond Steel Recycling

From: Enick, Oana V ENV:EX
To: Shutler, Graeme FLNR:EX <Graeme.Shutler@gov.bc.ca>, katie.semproni@gov.bc.ca <Katie.Semproni@gov.bc.ca>
Cc: Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>
Sent: October 14, 2021 8:01:01 AM PDT
Attachments: image003.jpg, image002.jpg, image004.jpg, image001.png, Change Approval and Notification (Changes In and About a Stream) 100357648.pdf, RE: Crown Lands File 2411360 and MoE File UA 173305 - Richmond Steel

Hello Graeme:

This is in follow-up to my email of September 24, 2021 (attached for reference and portions cut-and-pasted below) and subsequent meeting of October 6, 2021 regarding Richmond Steel Recycling. As discussed during the meeting, below is a summary of Richmond Steel's current status with the Ministry of Environment and Climate Change Strategy (ENV):

1. Richmond Steel Recycling, (RSR) on Mitchell Island has been operating since the early 1970s. The facility **does not** hold a waste discharge authorization.
2. Primary operations at the site include metal recycling (shearing, torch cutting, shedding), wet vehicle recycling, metal recycling from building demolition and construction industries, maritime salvage and transformer recycling). These activities are captured under commercial waste management and require an authorization to discharge under the Environmental Management Act (EMA). In the coming weeks, ENV intends to direct Richmond Steel, via an inspection report, to obtain a permit to discharge waste under EMA.
3. All liquid effluent is directed to a 'bio-swale' or marsh area on **private and crown land**, which drains directly into the Fraser River.
4. MoE issued a Pollution Prevention Order on Aug 5, 2021 (included in the email attachment above). The order was focussed on surface discharges and requested documents they already had as well as a waste characterization plan and implementation report.
5. RSR is currently complying with the order requirements and submitted sampling results for soils, sediments and surface water. These documents confirm the consistent and "*ubiquitous nature of contaminants across the site*" (p. 5 WCP, attached in the email above). The company conducted multiple sampling events between December 2017 and August 2021 in water, sediments and soil. Many of the samples, in **all three media appear to be on Crown Land and show varying levels of contamination for metals, PCBs and PAHs***, ranging from up to 100 times BC Water Quality Guidelines for metals to <10000 times BC WQG for PCBs.
6. RSR also submitted their Waste Characterization Plan which includes an "*Environmental Impact Assessment in support of [your] Water Sustainability Act Approval Application*". RSR is conducting an "*onsite ditch remediation and restoration project*" and are planning "*in-stream work below the high-water mark*". In a submission pursuant to the PPO, the company included the Change Approval and Notification application to FLNRO (attached).

In summary, their current discharges are not authorized and their data indicates that the site, including those portions owned by the Crown have levels of metal and PCB contamination far in excess of the BC Water Quality Guidelines. Correspondence with Richmond Steel indicates that the company is aware of the contamination at the site and is attempting to address it, but has not applied for a permit to discharge waste.

Their independent efforts notwithstanding, the company continues to discharge waste to the environment without an authorization to do so.

Please let me know if you require further details on the data, reports or correspondence on this file. Thank you, Oana.

*PCB = Polychlorinated biphenyl

PAH = Polycyclic Aromatic Hydrocarbons



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 [@ComplianceBC](#) *To report a spill call the Provincial Emergency Program at 1-800-663-3456*

More information about Environmental Compliance and how it is assessed can be found [here](#).



Change Approval and Notification (Changes In and About a Stream)

Tracking Number: 100357648

Applicant Information

If approved, will the authorization be issued to an Individual or Company/Organization? Company/Organization
What is your relationship to the company/organization? Consultant

APPLICANT COMPANY/ORGANIZATION CONTACT INFORMATION

Applicant is an Individual or an Organization to whom this authorization Permit / Tenure / Licence will be issued, if approved.

Name: PGL Environmental Consultants Ltd.
Doing Business As: PGL Environmental Consultants
Phone: 604-715-2662
Fax:
Email: agilbert@pggroup.com
BC Incorporation Number:
Extra Provincial Inc. No: Langley
Society Number:
GST Registration Number:
Contact Name: PGL Environmental Consultants
Mailing Address: 1500-1185 Georgia Street W
Vancouver BC V6E 4E6

CONSULTANT INFORMATION

Please enter the contact information of the Individual/Organization who is acting on behalf of the applicant.

Name: POTTINGER GAHERTY ENVIRONMENTAL CONSULTANTS LTD.
Doing Business As: PGL Environmental Consultants
Phone: 604-895-7641
Fax:
Email: jbergal@pggroup.com
BC Incorporation Number:
Extra Provincial Inc. No:
Society Number:
GST Registration Number:
Contact Name: Christina Trotter
Mailing Address: 1500-1185 West Georgia Street
Vancouver BC V6E 4E6
Letter(s) Attached: Yes (Ministry Letter - signed.pdf)

CORRESPONDENCE E-MAIL ADDRESS

If you would like to receive correspondence at a different email address than shown above, please provide the correspondence email address here. If left blank, all correspondence will be sent to the above given email address.

Email: agilbert@pggroup.com
Contact Name: Ashleigh Gilbert

ELIGIBILITY

Please answer the following questions related to your Change Approval/Notification.

Question	Answer	Warning
Is this application to support oil and gas activity that is being authorized by the Oil and Gas Commission?	No	

TECHNICAL INFORMATION

GOVERNMENT AND FIRST NATION FEE EXEMPTION REQUEST

Do you belong to, are you applying on behalf of, or are you:

- A provincial government ministry
- The Government of Canada
- A First Nation for water use on reserve land
- A person applying to use water on Treaty Lands
- A Nisga'a citizen
- An entity applying to use water from the Nisga'a Water Reservation?

No

APPLICATION BY GOVERNMENT

Please indicate if you are someone who works in the government OR you are working on behalf of the government.

Are you, or are you applying on behalf of, a government entity? No

TYPE OF WORKS

Please select the type of Notifications/Approvals you want to apply for as part of this application.

Please select the type of works to be undertaken:

Notification

- ☐ Road Crossing Culvert - Construction / Maintenance / Removal
- ☐ Clear Span Bridge - Construction / Maintenance / Removal
- ☐ Pipeline Crossing – Construction / Maintenance
- ☐ Dry Hydrant – Construction / Maintenance
- ☐ Pier, Wharf, (including docks) – Construction / Maintenance / Removal
- ☐ Cutting of annual vegetation in a stream channel
- ☐ Dike or Erosion Protection Works - Repair / Maintenance
- ☐ Storm Sewer Outfalls – Construction / Maintenance
- ☐ Control of Eurasian Watermilfoil or other invasive aquatic vegetation
- ☐ Ice Bridge / Winter Ford or Snowfill - Construction / Maintenance
- ☐ Maintenance of minor and routine nature by a public utility
- ☐ Removal of a beaver dam (as authorized under the Wildlife Act)
- ☐ Construction of a temporary ford
- ☐ Construction of a temporary diversion around a worksite

Approval:

- ☐ Bank Erosion Protection
- ☐ Bridge (other than clear span) - Construction / Maintenance / Removal
- ☐ Stream Diversion
- ☐ Large Debris Removal by machine - Plan required
- ☐ Gravel removal
- ☒ Other: Contaminated sediment remediation and water treatment system upgrade

Please note that the ultimate decision whether this constitutes a Notification or a Change Approval lies with the Province of British Columbia

SITES

Click on the Add Sites button to add one or more sites.

SITE

Location ID: Richmond Steel Recyclers Ditch

STREAM

Name of the Stream: unnamed
Source Flows Into: Fraser River

PROPOSED WORKS**Detailed Description of Works:**

The Project involves the remediation of a constructed ditch and upgrade to the water treatment system at the Richmond Steel Recycler's property in Richmond, BC. The scope includes:
Excavation and removal of contaminated sediment that has accumulated within an onsite ditch;
Construction of a detention pond and new water treatment system; and
Construction of a new bioswale and restoration planting.

Work will take place along the entirety of the constructed drainage ditch that flows along a portion of the northeast and east property boundaries of the Richmond Steel Recyclers property.

The initial work involves the remediation of impacted sediment within the ditch. Sampling results indicate sediment within the ditch contains levels of petroleum hydrocarbons, metals and select polychlorinated biphenyls (PCBs) that exceed applicable BC Contaminated Site Regulation (CSR) standards and/or Canadian Council of Ministers of the Environment (CCME) standards. The sediment remediation will involve excavating impacted sediment guided by the analytical results of confirmatory samples collected throughout the remediation process.

Once the remediation has been completed, the existing water/sediment separator will be replaced with a new water treatment system containing an oil water separator. The low functioning bioswale will be converted to a detention pond, extending from the new oil water separator to the ditch bend. An iron and hydrocarbon treatment system will be constructed south of the ditch bend. Works within the ditch will be conducted in the dry. If required, water will be temporarily pumped around the work area to maintain flow.

A contractor has not yet been selected.

A Qualified Environmental Professional (QEP) will act as the Environmental Monitor (EM) during the works. Best Management Practices (attached) will be followed.

Instream and bank work in the drainage ditch should take place during the same timing windows for the Fraser River works (June 16 to February 28) as per the requirement: British Columbia Marine/Estuarine Timing Windows for the Protection of Fish and Fish Habitat – South Coast and Lower Fraser Areas (DFO 2014). Fish are not anticipated to be present within the drainage ditch; however, an EM will be present to address and mitigate any incidental fish occurrences.

The entire project will be completed between June 2023 and September 2023 (4 months).

Footprint of Project: 800 m²

PROPOSED TIMING FOR WORKS

Instream Start Date: Jun 16, 2023

Instream End Date: Sep 30, 2023
Is the proposed timing within the approved regional timing window? Yes

LOCATION OF WORKS

Provide a legal description of the land(s) where works are proposed: 11760 Mitchell Road, Richmond, BC
Lot 8 PL NWP47113 Lot 8, Plan NWP47113, District Lot 459, Group 1, New Westminster Land District, Except Plan 49844
Geographic Coords of Works: 49.2020000, -123.0870000
Photo of Works Location:

LAND OWNERSHIP AT THE WORKS

Land Ownership: ☒ Applicant owns land
☐ Land is Crown Land but applicant has tenure
☐ Land is Crown Land but tenured to Ministry of Transportation
☐ A third Party owns the land but the applicant has lease or tenure
☐ A third Party owns the land but applicant has written consent
☐ Land is Crown Land but the applicant does not have a tenure

CONTACTS

If you are not carrying out the work, indicate contractor/company's name, professional affiliation, mailing address, postal code and telephone numbers. If a different company is designing and supervising the work, please include this information as well

Contact Info	Type of Contact
Name: Aplin & Martin Consultants Ltd Doing Business As: Engineer Phone: 604-678-9434 ext. 1419 Fax: Email: BC Inc. Number: GST Registration Number: Contact Name: Terence To Tok Shau Mailing Address: 1818-1177 Hastings Street W Vancouver BC V6E 2K3 Cert:	Design and Supervision
Name: McMillan LLP Doing Business As: Phone: 604-691-7427 Fax: Email: BC Inc. Number: GST Registration Number: Contact Name: Karl Gustafson Mailing Address: 1500-1055 Georgia Street W Vancouver BC V6E 4N7	Other
Name: Pottinger Gaherty Environmental Consultants Doing Business As: Phone: 604-682-3707 Fax: Email: BC Inc. Number: GST Registration Number: Contact Name: Ashleigh Gilbert Mailing Address: 1500-1185 Georgia Street W Vancouver BC V6E 4E6	Design and Supervision

Cert:

Name:	Richmond Steel Recycling	Other
Doing Business As:		
Phone:	604-394-2039	
Fax:		
Email:		
BC Inc. Number:		
GST Registration Number:		
Contact Name:	Steve Kynoch	
Mailing Address:	11760 Mitchell Road	
	Richmond BC V6V 1V8	

LOCATION INFORMATION

LAND DETAILS

DRAWINGS

A Drawing to Scale is required that meets the Application Drawing Standards. Choose one of the options below to submit the required map/drawing.

Additionally, it is recommended that you provide a topographical map showing the general location of the property where the water is proposed to be used and the works constructed in relation to nearby communities, highways, railways and other water sources.

(this additional map will not be necessary if your Drawing to Scale is provided using the Geomark Service or a spatial file such as .KML or .KMZ)

☒ I have map(s) saved to my computer and wish to provide these with my application

MAP FILES

Do you have a PDF or image file of a drawn map? You can upload it here.

Description	Filename
Site Location	RSR ditch.kmz

ATTACHED DOCUMENTS

Document Type	Description	Filename
Drawing to Scale	Existing Drainage Plan	Drainage Site Plan.pdf
Drawing to Scale	Impact Figure	21-5060-Impact Figure-01.pdf
Drawing to Scale	Restoration Figure	21-5060-Impact Figure-02.pdf
Engineering Drawings	Civil Design	21-5060 - Civil Set.pdf
Other	BMPs	BMPs for FLNRO and DFO subm...

Other	EIA with Site Photos	I-2160-10-09-EIA-v1.pdf
Other	Habitat Balance	RSR Habitat Balance-v01.xlsx
Other	QP Sign Off	QP Sign Off Forms -Richmond...

PRIVACY DECLARATION

PRIVACY NOTE FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Personal information is collected by FrontCounter BC under the legal authority of section 26 (c) and 27 (1)(a)(i) of the Freedom of Information and Protection of Privacy Act (the Act).

The collection, use, and disclosure of personal information is subject to the provisions of the Act. The personal information collected by FrontCounter BC will be used to process your inquiry or application(s). It may also be shared when strictly necessary with partner agencies that are also subject to the provisions of the Act. The personal information supplied in the application package may be used for referrals or notifications as required. Personal information may be used by FrontCounter BC for survey purposes.

For more information regarding the collection, use, and/or disclosure of your personal information by FrontCounter BC, please contact FrontCounter BC at 1-877-855-3222 or at:

FrontCounter BC Program Director
FrontCounter BC, Provincial Operation
441 Columbia Street
Kamloops, BC V2C 2T3

☒ Check here to indicate that you have read and agree to the privacy declaration stated above.

REFERRAL INFORMATION

Some applications may also be passed on to other agencies, ministries or other affected parties for referral or consultation purposes. A referral or notification is necessary when the approval of your application might affect someone else's rights or resources or those of the citizens of BC. An example of someone who could receive your application for referral purposes is a habitat officer who looks after the fish and wildlife in the area of your application. This does not apply to all applications and is done only when required.

Please enter contact information below for the person who would best answer questions about your application that may arise from anyone who received a referral or notification.

Company / Organization:	PGL Environmental Consultants Ltd.
Contact Name:	Ashleigh Gilbert
Contact Address:	1500-1185 Georgia Street W Vancouver BC V6E 4E6
Contact Phone:	604-715-2662
Contact Email:	agilbert@pggroup.com

☒ I hereby consent to the disclosure of the information contained in this application to other agencies, government ministries or other affected parties for referral or First Nation consultation purposes.

IMPORTANT NOTICES

Please review the "Important Notices" below and then check the declaration at the bottom confirming that everything in this application is complete and accurate.

- I understand that the submission of this application does not provide authority under the Water Sustainability Act to construct works in and about a stream. I also understand that my application must be reviewed before a decision is made as to whether an approval may be granted and that, as part of that review, additional information may be requested of me.
- The application may be subject to further requirements under the federal Fisheries Act. Please refer to Fisheries and Oceans Canada Projects Near Water webpage (<http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html>) for information on how to ensure your project complies with the Fisheries Act.

DECLARATION

☒ By submitting this application form, I declare that the information contained on this form is complete and accurate.

APPLICATION AND ASSOCIATED FEES

Item	Amount	Taxes	Total	Outstanding Balance
Changes in and about a Stream Application Fee	\$250.00		\$250.00	\$0.00

OFFICE

Office to submit application to: Surrey

PROJECT INFORMATION

Is this application for an activity or project which requires more than one natural resource authorization from the Province of BC? No

APPLICANT SIGNATURE

Applicant Signature	Date
---------------------	------

OFFICE USE ONLY			
Office Surrey	File Number		Project Number
	Disposition ID		Client Number

RE: Crown Lands File 2411360 and MoE File UA 173305 - Richmond Steel

From: Enick, Oana V ENV:EX
To: Shutler, Graeme FLNR:EX <Graeme.Shutler@gov.bc.ca>
Cc: katie.semproni@gov.bc.ca, Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>, samantha.patterson2@canada.ca, wmills@richmond.ca
Sent: September 24, 2021 12:17:31 PM PDT
Attachments: image005.jpg, image001.jpg, image002.jpg, image007.jpg, image003.png, 2021-09-01 Pollution Prevention Order 110800 Richmond Steel - Amended.pdf, 2021-09-16 Waste Characterization Plan.pdf

Hi Graeme:

Thank you for taking the time to discuss this file a few days ago.

I will send an invitation to you and Katie as well as EC and City of Richmond staff for recurring meetings once per month so we can keep in contact. Please let me know if others would like to be included (I think you mentioned someone from the Lands section?).

Here is some of the information we have:

- RSR is conducting an *"onsite ditch remediation and restoration project"*. They also detected contamination on crown land (the part of the bio-swale that is leased from the Crown as well as the water front part of the property). They are planning *"in-stream work below the high-water mark"*.
- As you noted, their tenure is expired and they are looking to re-new.
- They are discharging off site without Environmental Management Act authorization and at the moment are not engaged in the process of obtaining one.
- MoE issued a Pollution Prevention Order on Aug 5, 2021. The order was focussed on surface discharges and requested documents they already had and a waste characterization plan (and implementation report). This order is attached for reference.
- RSR is currently complying with the order requirements and included sampling results for soils and sediments along with surface water in their response submission.
- RSR has also submitted their Waste Characterization Plan which includes an *"Environmental Impact Assessment in support of [your] Water Sustainability Act Approval Application"*. This Waste Characterization Plan is attached.
- At this time, the Ministry is only focussed on effluent discharges from the site. Specifically, at this time, no determination of site condition or extent of contamination in any media will be requested by Compliance and Environmental Enforcement's current engagement via the PPO. That responsibility and authority rests with the Land Remediation Section of the Environmental Emergencies and Land Remediation Branch. Information regarding the Ministry's site remediation can be found at <https://www2.gov.bc.ca/gov/content/environment/air-land-water/site-remediation>.

Thanks, Oana.



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

From: Shutler, Graeme FLNR:EX <Graeme.Shutler@gov.bc.ca>

Sent: September 20, 2021 3:40 PM

To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Subject: Crown Lands File 2411360 - Richmond Steel

Hi Oana,

I am reaching out to you about a compliance issue identified in January 2020 with Richmond Steel and Recycling at 11760 Mitchell Road, Richmond. I have included the email sent to you from Warren Mills at the City of Richmond back in April. I have reached out to Warren but have not yet connected with him.

This file was recently re-assigned to me for review and we are in the process of replacing Richmond Steel's Crown land lease. I am inquiring about their status with MoECC - are there any actions / investigations occurring with this site or ongoing concerns related to their 2020 compliance issues?

Thank you for your assistance!



Graeme Shutler
Authorizations Specialist (Land)
236.468.3366
[Report a Natural Resource Violation](#)



August 5, 2021
Amended: August 10, 2021
Amended: September 1, 2021

Order Number: 110800

Via email: skynoch@richmondsteel.ca and HDhillon@richmondsteel.ca

Richmond Steel Recycling Limited
11760 Mitchell Road
Richmond, BC V6V 1V8

Attention: Steven Kynoch, Regional SHECS Manager and Harbinder Dhillon, President

Pollution Prevention Order – Richmond Steel Recycling Ltd.

This Order is being issued under Section 81 of the *Environmental Management Act* (EMA), SBC 2003, C. 53. **This Order supersedes the versions issued on August 5, 2021 and last amended on August 10, 2021.** I am satisfied on reasonable grounds that an activity at Richmond Steel Recycling Ltd. (Richmond Steel) located at 11760 Mitchell Road, Richmond, British Columbia is being performed by a person in a manner that is likely to release effluent that will cause pollution. Specifically, the Richmond Steel facility is located on the described land parcel:

Lot 8 Except Part Plan 49844 District Lot 459 Group 1 New Westminster
District Plan 47113

GROUND FOR ISSUANCE

I am satisfied that Richmond Steel is a person who:

- previously had or now has possession, charge or control of the substance;
- previously did anything, or who is now doing anything, which may cause the release of the substance; or
- previously owned or occupied, or now owns or occupies, the land on which the substance is located.

The substance likely to be released in a manner that will cause pollution is effluent from a facility classified in the Waste Discharge Regulation Schedule I as a “Commercial Waste Management and/or Waste Disposal Industry” and/or “Hazardous Waste Management” and in Schedule II as a “Vehicle Dismantling and Recycling Industry”.

As per their Environmental Management Plan (2021) (EM Plan), Richmond Steel, “a joint venture between Sims Metal Management and Nucor Corporation, has been operating since the early 1970s, [with] the primary onsite operations including metal recycling, wet vehicle handling and recycling, mobile car crushing, industrial bin services, building demolishing, and maritime salvage”. As per their Drainage & Mitigation Plan (2021) (D&M Plan), all stormwater on the site is directed to the bioswale area and ditch which flows directly into the Fraser River.

On December 12, 2019, Environment and Climate Change Canada (ECCC) enforcement staff “witnessed a pool of sediment-laden water with a grey sheen on its surface... directly adjacent to the Fraser River...” and “witnessed sediment-laden water with a grey sheen flowing from the aforementioned pool of water towards the Fraser River and discharging directly into the Fraser River from the foreshore of the property”. ECCC staff further “witnessed a grey sheen spreading across the surface of the Fraser River, originating at the flow of water discharging from foreshore of the property” (ECCC Warning Letter).

ECCC staff collected samples “from the aforementioned flow of water into the Fraser River and from a treatment ditch on the East side of the property”, flowing into the Fraser River. These samples were analysed at the ECCC, Pacific & Yukon Laboratory for Environmental Testing and ECCC shared the results with the Ministry of Environment and Climate Change Strategy (Ministry). The results showed levels of aluminum, copper, zinc, polychlorinated biphenyl (Arochlor-1242), naphthalene, benz(a)anthracenes, and pyrene to be above British Columbia Water Quality Guidelines (BCWQG), as listed in the summary table below (Table 1):

Table 1: Summary Table of ECCC samples collected on December 12, 2019. (Grey highlights indicate values either below BCWQG or between phototoxic and non-phototoxic). Source: 2020-01-28 V19L036_1 Detailed ECCC Results

Parameter	ECCC Results Bioswale	ECCC Results Shore/Dock	BCWQG
COD	506 mg/L	472 mg/L	
TSS	271 mg/L	2170 mg/L	
Aluminum (dissolved)	0.11 mg/L	0.12 mg/L	0.1 Acute mg/L 0.05 Chronic mg/L
Copper dissolved (mg/L)	0.45 mg/L (pH 7.3, Hardness 130, DOC 10*) *mid-range estimate for DOC	0.010 mg/L (pH 7.9, Hardness 150, DOC 10*) *mid-range estimate for DOC	0.0179 Acute mg/L 0.00298 Chronic mg/L 0.0348 Acute mg/L 0.00594 Chronic mg/L
Zinc, total (mg/L)	2.46 mg/L	14.6 mg/L	0.063 Acute mg/L 0.0375 Chronic mg/L
PCB, total (µg/L)	10.1 µg/L = 10100 ng/L	20.8 µg/L = 20800 ng/L	0.1 ng/L Acute (HWR = 0.005 mg/L = 5000ng/L)
Naphthalene (ug/L)	4.97 µg/L	0.52 µg/L	1 µg/L
Benz(a)anthracenes (ug/L)	0.44 µg/L	0.49 µg/L	0.1 µg/L Chronic
Fluoranthene	0.65 µg/L	1.12 µg/L	0.2 µg/L Phototoxic 4 µg/L Non-phototoxic
Pyrene	0.70 µg/L	1.14 µg/L	0.02 µg/L Chronic

In response to ECCC's findings, "*RSR retained Pottinger Gaherty Environmental Consultants Ltd. (PGL) to develop a Stormwater Management and Mitigation Plan (the Stormwater Plan) [that] included undertaking additional investigation of site conditions to help inform RSR's decisions as to the steps required to manage stormwater effectively*" (Update Letter, March 15, 2021).

In May 2021, Richmond Steel submitted updated D&M and EM Plans. Neither documents include sampling specifics or analytical results and neither documents propose an on-going sampling, monitoring, and reporting schedule (D&M Plan, 2021 and EM Plan, 2021).

On July 2, 2020, Ministry staff conducted an inspection of the Richmond Steel facility and assessed compliance with the Hazardous Waste Regulation (HWR), Section 17(1)(b), as not-determined because facility staff were unable to locate sample records. Richmond Steel staff later reported in a July 15, 2020, email that they "*did not find any reports or records of a storm water sampling program*". The inspection report concludes that "*there were no sample records*".

On April 26, 2021, Ministry staff again requested the sampling records to demonstrate compliance with HWR, Section 17(1)(b), and no records were provided. In direct response to the issue of HWR, Section 17(1)(b) records, Richmond Steel stated in a May 7, 2021, email – Compliance Advisory Table that "*Richmond Steel Recycling is not a Hazardous Waste Storage facility*", but do acknowledge in that same email that '*Sch. 1.2 does apply to the discharge*' (email, May 7, 2021).

On March 23, 2021, in an update letter to the City of Richmond, Mr. Keith Gagne, P.Eng, of PGL Environmental Consultants suggests that potential pollution is ubiquitous throughout the site and is on-going "*PCBs were non-detect (N.D.) in the soil samples; however, surface water throughout the Site exceeded BC Water Quality Guidelines. RSR was unable to isolate the PCB impacts to one area. it appears that the low levels of PCBs are likely related to ongoing activities, regardless of the controls RSR has or might reasonably put in place to prevent PCB materials from entering the Site.*"

Based on this information, I am satisfied on reasonable grounds that this activity/operation is being performed in a manner that is likely to release a substance that will cause pollution.

ORDER

Pursuant to Section 81 of the *Environmental Management Act* [SBC 2003] Chapter 53, Richmond Steel is hereby ordered to comply with the required actions listed in the table below and to provide information to the Director indicating the completion of each action.

Item	Required Action	Required by midnight on:
1.	Retain a Qualified Professional to develop a Waste Characterization Plan (Plan). This Plan must include details of how and when Richmond Steel will:	August 26, 2021

Item	Required Action	Required by midnight on:
	<ul style="list-style-type: none"> a) Identify Contaminants of Potential Concern (COPC), including but not limited to metals, PCBs, PAHs – alkylated and non-alkylated, TSS, pH, hardness, COD in effluent throughout the site and in the oil/water separator discharge; b) Identify the source of COPC entering effluent and the activities on site responsible for the source; and c) Obtain laboratory analysis to support the assessments above and compare the results to both the British Columbia Water Quality Guidelines and the Hazardous Waste Regulation Schedule 1.2 criteria. 	
2.	Submit the Plan for approval to the Director.	September 16, 2021
3.	Implement the Approved Plan within two weeks of receiving Director's Approval.	
4.	<p>Submit a report detailing the findings from the Plan. The report must include:</p> <ul style="list-style-type: none"> a) Laboratory analysis raw and summary data described in the Waste Characterization Plan; b) Interpretation of the analysis described in the Plan and the conclusions reached; c) Rationale explaining how the location, sampling method and frequency, and results support the conclusions reached; d) Recommendations for mitigation measures that would prevent any further escape of contaminants; and e) Certification by a Qualified Professional. 	January 12, 2022
5.	<p>Submit the following documents to the Ministry:</p> <p>The report(s), data and/or information, including location and results of all samples of any media taken in order to develop the first and any subsequent versions of the Stormwater Drainage and Mitigation Plan (including Drainage and Mitigation Plan Development Strategy, 2020 and 2021) commissioned from PGL Consultants or any other consultants, by Richmond Steel in response to the detection of PCB contamination by Environment Canada in December 2019. These include, but are not limited to:</p> <ul style="list-style-type: none"> a) results of all analysis completed on soil sampling in unpaved areas (soil sampled by advancing soil pits), b) results of all analysis on surface water samples collected throughout the Site, 	September 9, 2021

Item	Required Action	Required by midnight on:
	<ul style="list-style-type: none"> c) results on auto-shredder residual samples, and d) sampling plan and method(s), results, interpretation, and a rationale for conclusions reached. 	
6.	<p>Submit the following additional documents to the Ministry:</p> <ul style="list-style-type: none"> a) Reports, results and assessments regarding environmental quality status of effluent/stormwater on the site, that Richmond Steel, their consultants or agents, have or have requested. b) Laboratory analysis for the contaminants of concern identified by a qualified professional, interpreted and compared to the British Columbia Water Quality Guidelines and the Hazardous Waste Regulation Schedule 1.2 for the period June 2019 to July 2021. c) Records of the oil/water separator maintenance and cleaning schedule and manifests detailing the management of the residual wastes associated with this activity. d) Records documenting work already completed on the ditch/bio-swale (including but not limited to analytical results, photographs, professional interpretations and reports). 	September 9, 2021
7.	<p>Monthly reporting:</p> <p>By the 10th of each month, Richmond Steel must provide and update of activities from the month previous. These monthly updates must include a summary of activities completed towards complying with requirements 1 through 6 of the order.</p> <p>This requirement will remain in place until this Order is cancelled by the Director.</p>	On the 10 th day of every month starting on September 10, 2021
8.	The qualified professional(s) performing any of the following in response to this order: performing work, authoring reports, authoring the Waste Characterization Plan and Report and/or providing opinions must complete and submit the attached Declaration of Competency and Conflict of Interest Disclosure Statement forms.	First QP submission of past, current or future work

For the purposes of this Order, the following definition applies:

"Qualified Professional" means an applied scientist or technologist specializing in a particular applied science or technology, including agrology, biology, chemistry, engineering, geology or hydrogeology, who (a) is registered in British Columbia with the professional organization responsible for his or her area of expertise, acting under that professional association's code of ethics and subject to disciplinary action by that association, and (b) through suitable education, experience, accreditation and knowledge, may be reasonably relied on to provide advice within his or her area of expertise as it relates to this order, or (c) is approved by the Director.

DUTY TO COMPLY

The requirements above must be completed on or before the associated “Required By” date. Failure to comply with the requirements of this order is a contravention of the *Environmental Management Act* [SBC 2003, c.53] and may result in legal action. I direct your attention to Section 120(10) of the *Environmental Management Act*, which reads:

“(10) A person who contravenes an order...that is given, made or imposed under this Act by a ...director...commits an offence and is liable on conviction to a fine not exceeding \$300 000 or imprisonment for not more than 6 months, or both.”

Failure to comply with the requirements of this order may also result in an administrative penalty under the Administrative Penalties Regulation (*Environmental Management Act*) [B.C. Reg 133/2014] (Regulation). I direct your attention to Section 12(4) of the Regulation, which reads:

“(4) A person who fails to comply with an order under the [Environmental Management] Act is liable to an administrative penalty not exceeding \$40,000.”

RIGHT TO APPEAL

This decision may be appealed to the Environmental Appeal Board in accordance with Part 8 of the *Environmental Management Act*. An appeal must be delivered within 30 days from the date notice of this order is given. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

NOTIFICATION OF PUBLICATION

The Party is notified that the Province intends to publish on the Ministry of Environment website the entirety of any Regulatory Document provided that:

- a) The Province will provide written notice to the party of its intent to publish the Regulatory Documents at least [14] days prior to publication;
- b) The Province will not publish any information what could not, if it were subject to a request under section 5 FOIPPA, be disclosed under the Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. 165 as amended from time to time.

This order will also appear in the Ministry of Environment’s Quarterly Environmental Enforcement Summary and Environmental Violations Database.

MINISTRY CONTACT

If you have any questions, please contact the undersigned at Dan.Bings@gov.bc.ca or Environmental Protection Officer Oana Enick at 236-468-2231 and Oana.Enick@gov.bc.ca.

Regards,



Daniel P. Bings
for Director, *Environmental Management Act*
Compliance Operations Manager

Attachments:

QP declaration of competency form
QP conflict of interest disclosure statement

cc:

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Waste Characterization Plan



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PGL File: 2160-00.34

September 2021



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Executive Summary

PGL Environmental Consultants (PGL) prepared this Waste Characterization Plan on behalf of Richmond Steel Recycling Ltd. to fulfill Items 1 and 2 of Pollution Prevention Order 110800 for 11760 Mitchell Road, Richmond, BC (the Site). The plan describes contaminants of potential concern, their potential sources on the Site, and the methods by which they will be assessed moving forward.

Work done onsite to date shows contaminants are present across the Site, rather than in individual/compartimentalized areas. Source control is not expected to be a comprehensive solution. The Site is predominately paved with concrete and has a working stormwater management system with planned upgrades at the end of September 2021. Stormwater runoff transports contaminants into existing infrastructure, and discharges at a single location on the Site (into the bioswale). PGL is pursuing approval from the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD) for the implementation of a treatment system at the system discharge point into the bioswale and remedial work in the bioswale.

PGL proposes implementing a quarterly monitoring program until the FLNRORD application is processed, and a treatment system is implemented. This program would start in Q4 after the proposed Site drainage upgrades are completed. In paved areas, the surface water will be sampled via existing infrastructure such as catch basins and oil-water separators. In unpaved areas, groundwater will be sampled via monitoring wells that would be installed upon the acceptance of this Waste Characterization Plan.

This Executive Summary is subject to the same standard limitations as contained in the report and must be read in conjunction with the entire report.

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List of Acronyms

APEC	-	area of potential environmental concern
ASR	-	Automobile Shredder Residue
ENV	-	BC Ministry of Environment and Climate Change Strategy
FLNRORD	-	Ministry of Forests, Lands, Natural Resource Operations and Rural Development
MRP	-	Metal Recycling Plant
PAH	-	polycyclic aromatic hydrocarbon
PCBs	-	polychlorinated biphenyls
PCOC	-	potential contaminant of concern
PGL	-	PGL Environmental Consultants
PHC	-	petroleum hydrocarbon
RSR	-	Richmond Steel Recycling Ltd.
WCP	-	Waste Characterization Plan

1.0 INTRODUCTION

PGL Environmental Consultants (PGL) was engaged on behalf of Richmond Steel Recycling Ltd. (RSR) to assist RSR in the development of a Waste Characterization Plan (WCP) at 11760 Mitchell Road, Richmond, BC (the Site).

The WCP was developed to meet the requirements of Items 1 and 2 of Pollution Prevention Order 110800 issued to RSR by the BC Ministry of Environment and Climate Change Strategy (ENV) on August 5, 2021. The WCP describes contaminants of potential concern on the Site (Item 1a), their potential sources on the Site (Item 1b), and the methods by which they will continue to be assessed (Item 1c).

2.0 BACKGROUND

RSR operates a metal recycling business at 11760 Mitchell Road, Richmond, BC. The Site is located adjacent to the north arm of the Fraser River, in the industrial area of Mitchell Island, Richmond.

Environment Canada and the environmental department of the City of Richmond visited RSR in December 2019. During their visit, Environment Canada collected water samples from surface water on the Site at two locations. Environment Canada issued a warning letter to RSR indicating potential contaminants harmful to the environment may be leaving the Site and entering the Fraser River. RSR took steps in early January 2020 to prevent stormwater from bypassing its water treatment facilities. In further response to both Environment Canada and the City of Richmond, RSR engaged PGL to develop a Drainage & Mitigation Plan and an Environmental Management Plan for the Site.

The ENV identified that the plans lacked sampling and reporting specifics, as well as an assessment of potential sources of contamination on the Site. This WCP was created to address these items.

3.0 AREAS OF POTENTIAL ENVIRONMENTAL CONCERN

PGL visited the Site on September 7, 2021, to assess activities on the Site and identify sources of potential contaminants of concern (PCOCs). PGL identified 10 areas of potential environmental concern (APECs) (Figure 1). We had the following observations:

- General sources of contamination include waste oil, hydraulic fluid, fuels, solvents, coolant, and vehicle electronics;
- Most APECs are unprotected from rainfall and are situated on concrete;
- Stormwater/washwater runoff from the Site enters the stormwater management system that eventually discharges into the bioswale;
- Some APECs are not situated on concrete;
- The location/boundary of some APECs within the yard is not static – feedstocks and/or finished products move;
- Various chemical products are used/stored onsite in low quantities (see Appendix 2 for a summary from a master list of Material Safety Data Sheets); and
- Small fluid spills/leaks are distributed over the Site (see Appendix 3 for a list of all reported spills onsite in 2021).

Table A: APEC and PCOC Summary

APEC#	Description	Comments	PCOCs
1	Maintenance Shop and Outdoor Work Area	Predominately routine, minor mechanical work such as oil/coolant changes on onsite mobile equipment. Fluids are stored inside the shop, but work is mostly completed outside the shop (uncovered) on the adjacent concrete slab. Drains to the south.	PHCs, PAHs, metals, PCBs, solvents, glycols
2	Automotive Shredder Residue (ASR) Machinery and Storage Pile	Dry vehicles that have been purged of their fluids are shredded. The shredder produces three streams; shredded ferrous metal, automobile shredded residual (ASR), and a co-mingled stream of non-ferrous metal and ASR. The shredder is not protected from rain and is situated on a concrete slab – hydraulic drips likely enter stormwater system. Two drains are located under the machinery.	PHCs, PAHs, metals, PCBs, solvents, glycols
3	Metal Recycling Plant (MRP) Machinery	Co-mingled non-ferrous and ASR are further processed in the MRP to reclaim the non-ferrous metals. The MRP is an open system – drips likely enter the RSR stormwater system. Drains north.	PHCs, PAHs, metals, PCBs, solvents, glycols
4	Metal Sorting Area	Trucks loaded with scrap metal dump their loads in the sorting area on the central portion of the yard. Front-end loaders move the scrap into piles to be processed. The footprint changes but is always on a concrete slab, unprotected from rain – drips likely enter the RSR stormwater system. Drains west.	PHCs, PAHs, metals, PCBs, solvents, glycols
5	Dry Vehicle Storage	Vehicles that have been drained of automotive fluids and crushed offsite are stored in tall stacks. These crushed vehicles are often stored in areas of the yard that are not hard surfaced. Residual fluid drips could enter the subsurface. Footprint changes.	PHCs, PAHs, metals, PCBs, solvents, glycols
6	Burn Area	Large pieces of scrap metal are cut by acetylene torch into smaller, more manageable pieces. No liquids are used in the process. This operation takes place in an area that is not hard surfaced. Metal fines are deposited directly onto soil. This is a risk to groundwater.	Metals
7	Bailer	Scrap non-ferrous metal is compressed and tied into bails for transport. The bailer is not protected from rain and is situated on a concrete slab – drips likely enter stormwater system. Drains south.	PHCs, PAHs, metals, PCBs, solvents, glycols
8	SEDA Vehicle Drainage System	Wet vehicles are hoisted and drained of all fluids. Work is completed under a rain cover. Drained automotive fluids are stored in tanks outside with secondary containment. Area drains east and south.	PHCs, PAHs, metals, PCBs, solvents, glycols
9	Non-Ferrous Storage	Non-ferrous scrap metal is stored in a pile prior to sale. The area is not protected from rain and is situated on a concrete slab – drips likely enter stormwater system. Drains south.	PHCs, PAHs, metals, PCBs, solvents, glycols
10	Various Spills and Mobile Equipment Leaks	Multiple fluid spills have been reported onsite in 2021 (mostly hydraulic oil but also coolant and diesel fuel). Spills are located across the Site. Leaks from mobile equipment (front-end loaders, forklifts, tractor trailers) observed across the Site.	PHCs, PAHs, metals, PCBs, solvents, glycols

Notes: PHCs – petroleum hydrocarbons
PCB – polychlorinated biphenyls

PAHs – polycyclic aromatic hydrocarbons

Please see Appendix 1 for an expanded list of PCOCs.

4.0 PROPOSED MONITORING PLAN

PGL proposes sampling locations adjacent to or downstream of all APECs. Location type will vary based on if the APEC is captured by the stormwater management system (surface water) or would be captured by monitoring wells (groundwater). Since contaminants are expected across the Site, all samples would be analyzed for:

- Petroleum hydrocarbons (PHCs);
- Polycyclic aromatic hydrocarbons (PAH);
- Metals;
- Polychlorinated biphenyls (PCBs);
- Solvents; and
- Glycols.

PGL follows our standard operating field procedures and all applicable ENV guidelines, standards, and regulations when collecting field samples (including Guidelines for Designing and Implementing a Water Quality Monitoring Program in British Columbia, Field Test Edition by ENV – Water Quality Branch). PGL's standard methodologies for groundwater sampling are available for review in Appendix 5.

4.1 Surface Water Sampling

Runoff from APECs situated on concrete and captured by the stormwater management system will be sampled via existing infrastructure. Grab samples will be collected from the nearest downstream catchment point, such as catch basins, collection chambers, oil-water separators, grit chamber, and physical separator. Sample locations are shown on Figure 2.

4.2 Groundwater Sampling

In unpaved areas, APECs will be assessed by analyzing the groundwater at/adjacent to the APEC. Upon approval of the WCP, four boreholes will be drilled on the eastern portion (non-hard-surfaced area) of the Site and finished as monitoring wells. Proposed borehole locations are shown on Figure 2. Actual locations may vary due to accessibility and ability to sample in the future.

4.3 Detailed Sampling Plan

Table B: Detailed Sampling Plan

APEC #	APEC Assessed	Sampling Location(s)	Rationale
1	Maintenance Shop and Outdoor Work Area	OW-01	OW-01 is downstream of many APECs, but is the only available sampling location close to APEC 1.
2	Automotive Shredder Residue (ASR) Machinery and Storage Pile	Chamber-01, Chamber-02	Both collection chambers are situated under APEC 2.
3	Metal Recycling Plant (MRP) Machinery	CB-09	Nearest downstream catch basin

APEC #	APEC Assessed	Sampling Location(s)	Rationale
4	Metal Sorting Area	CB-08	Nearest downstream catch basin
5	Dry Vehicle Storage	Three proposed monitoring wells; two on the southeastern portion of the site and one on the central portion of the site	APEC situated on unpaved ground. APEC covers a large area but does not have a static footprint, so three monitoring wells provides area coverage.
6	Burn Area	One proposed monitoring well, situated between the APEC and the bioswale	Downgradient of the APEC
7	Bailer	CB-02, CB-03	Catch basins located on both sides of the APEC to catch runoff in either direction
8	SEDA Vehicle Drainage System	CB-05, CB-06	Nearest downstream catch basins
9	Non-Ferrous Storage	Chamber-02	Nearest downstream collection point
10	Various Spills and Mobile Equipment Leaks	CB-04, CB-07, Separator, OW-01, OW-02	Provide additional coverage across the Site and some are situated in areas with observed surficial staining
n/a	All	Ditch, Ditch-River	Samples represent the discharge from the stormwater management system into the bioswale/ditch, and the discharge from the bioswale/ditch into the Fraser River. These samples will also be analyzed for Total Suspended Solids and chemical oxygen demand.

4.4 Applicable Regulations

As per Pollution Prevention Order 110800, surface water is to be compared to BC Water Quality Guidelines and Hazardous Waste Regulation Schedule 1.2. These guidelines/regulations are applicable to grab samples collected from stormwater infrastructure, as well as the bioswale/ditch samples.

Groundwater collected would be compared to BC Contaminated Sites Regulation Schedule 3.2 - Protection of Marine and Freshwater Aquatic Life.

5.0 IMPLEMENTATION

PGL recommends quarterly monitoring events to ensure regular, comparative data collection. Site upgrades, including significant concrete resurfacing, are expected to start at the end of September 2021 and finish by mid-October 2021. These upgrades are expected to improve drainage around APECs and across the Site (see Appendix 4 - RSR Concrete Resurfacing Plan for additional information). PGL proposes quarterly monitoring starting in Q4 2021 after the work is complete.

Groundwater monitoring well installation, if approved, would take place in mid-October (based on contractor availability).

Reporting to the ENV would include analytical results, interpretation of the analytical results, and pertinent Site photographs. PGL does not expect significant other work to be completed onsite between monitoring events. It may be more efficient to include any other small work done onsite in these regular reports in lieu of the monthly reporting requirement.

Due to the ubiquitous nature of contaminants across the Site, RSR is currently pursuing an application with the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD) to approve the implementation of an end-of-line treatment system as considered in the Drainage & Mitigation Plan. Concurrent with the application to the FLNRORD, RSR has submitted a Request for Review to Fisheries and Oceans Canada. The bioswale would be remediated (removal of impacted sediments) and converted to a stormwater detention pond. All Site stormwater would be collected in this detention pond and then pumped through a packaged treatment plant and discharged to the lower reach of the Site's drainage ditch. The lower reach sediments will be remediated as part of the stormwater management system upgrade. Please see Appendix 6 for the Environmental Impact Assessment completed as part of the FLNRORD application by RSR.

RSR is currently pursuing a plan to cover the ASR pile on the Site to prevent contact with rainwater. In addition, RSR has implemented process changes to reduce the amount of ASR stored on the Site. These measures are expected to reduce potential contamination of stormwater.

PGL proposes implementing the quarterly monitoring program until the FLNRORD application is processed and the treatment system and related remedial work is implemented.

6.0 CONCLUSION

The focus of this plan is to regularly monitor potential sources of contamination across the Site. Based on work to date (data submitted to the ENV on September 8, 2021), and despite the proposal to cover the ASR pile and the changes to reduce the amount of ASR onsite, RSR and PGL have concluded that source control alone will not eliminate contaminants from entering the stormwater management system. As a result, RSR and PGL have developed the Drainage & Mitigation Plan to install an end-of pipe treatment system combined with remedial work in the bioswale/ditch to enhance the effectiveness of the additional upstream controls.

RSR is committed to improving stormwater system maintenance, as evidenced by their proposed \$1M+ upgrade to Site drainage. RSR hopes to work together with the ENV and other regulatory agencies to ensure stormwater runoff compliance.

PGL and RSR look forward to comments regarding this WCP.

7.0 STATEMENT OF LIMITATIONS AND CONDITIONS FOR REPORT

7.1 Complete Report

All documents, records, data and files, whether electronic or otherwise, generated as part of this assignment are a part of the Report, which is of a summary nature and is not intended to stand alone without reference to the instructions given to PGL by the Client, communications between PGL and the Client, and any other reports, proposals or documents prepared by PGL for the Client relative to the specific site described herein, all of which together constitute the Report.

In order to properly understand the suggestions, recommendations and opinions expressed herein, reference must be made to the whole of the Report. **PGL is not responsible for use by any part of portions of the Report without reference to the whole report.**

7.2 Basis of Report

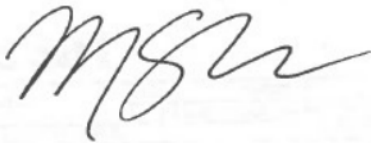
The Report has been prepared for the specific site and purposes that are set out in the contract between PGL and the Client. The findings, recommendations, suggestions, or opinions expressed in the Report are only applicable to the site and purposes in relation to which the Report is expressly provided, and then only to the extent that there has been no material alteration to or variation from the information provided or available to PGL.

7.3 Use of the Report

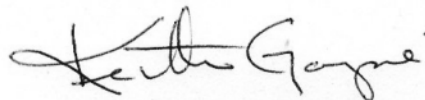
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MTS/KHG/mtl

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Figures

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PLANNED SAMPLING LOCATIONS AND SITE DRAINAGE			
11760 Mitchell Road, Richmond, BC			
MCMILLAN LLP			
	File No.:	Dwg No.:	FIGURE
	2160-00.34	WCP_0020	
	Date:	Drawn by:	2
	SEP 2021	IRB	

Appendix 1
Expanded List of PCOCs

Petroleum Hydrocarbons (PHCs)

LEPH
HEPH
VHw6-10
VPH
benzene
toluene
ethylbenzene
xylene
MTBE

Polycyclic Aromatic Hydrocarbons (PAHs)

acenaphthene
anthracene
benz(a)anthracene
benzo(a)pyrene
benzo(b+j)f|uoranthene
benzo(ghi)perylene
benzo(k)fluoranthene
chrysene
dibenz(a,h)anthracene
fluoranthene
fluorene
indeno(1,2,3-cd)pyrene
methylnaphthalene, 1-
methylnaphthalene, 2-
naphthalene
phenanthrene
pyrene
quinoline

Metals

aluminum
antimony
arsenic
barium
beryllium
boron
cadmium
chromium, hexavalent

chromium, trivalent
cobalt
copper
iron
lead
lithium
manganese
mercury
molybdenum
nickel
selenium
silver
strontium
thallium
tin
titanium
tungsten
vanadium
zinc

Polychlorinated biphenyls (PCBs)

aro-chlor 1016
aro-chlor 1221
aro-chlor 1232
aro-chlor 1242
aro-chlor 1248
aro-chlor 1254
aro-chlor 1260
aro-chlor 1262
aro-chlor 1268
decachlorobiphenyl
heptachlorobiphenyl, 2,3,3,4,4,5,5- (PCB 189)
hexachlorobiphenyl, 2,3,3,4,4,5- (PCB 156)
hexachlorobiphenyl, 2,3,3,4,4,5- (PCB 157)
hexachlorobiphenyl, 2,3,4,4,5,5- (PCB 167)
hexachlorobiphenyl, 3,3,4,4,5,5- (PCB 169)
PCB 080
PCB 118
pentachlorobiphenyl, 2,3,3,4,4- (PCB 105)
pentachlorobiphenyl, 2,3,4,4,5- (PCB 114)
pentachlorobiphenyl, 2,3,4,4,5- (PCB 123)
pentachlorobiphenyl, 3,3,4,4,5- (PCB 126)

tetrachlorobiphenyl, 3,3,4,4- (PCB 77)
tetrachlorobiphenyl, 3,4,4,5- (PCB 81)

Solvents

carbon tetrachloride
chloroethane
chloroform
chloromethane
dichloroethane, 1,1-
dichloroethane, 1,2-
dichloroethylene, 1,1 -
dichloroethylene, 1,2-cis-
dichloroethylene, 1,2-trans-
dichloromethane
tetrachloroethylene
tetrachloroethane, 1,1,1,2-
tetrachloroethane, 1,1,2,2-
trichloroethane, 1,1,1-
trichloroethane, 1,1,2-
trichloroethylene
vinyl chloride
chlorobenzene
dichlorobenzene, 1,3-
dichlorobenzene, 1,2-
dichlorobenzene, 1,4-
hexachlorobenzene
pentachlorobenzene, 1,2,3,4,5-
tetrachlorobenzene, 1,2,3,4-
tetrachlorobenzene, 1,2,3,5-
tetrachlorobenzene, 1,2,4,5-
trichlorobenzene, 1,2,3-
trichlorobenzene, 1,2,4-
trichlorobenzene, 1,3,5-
acetone
acetophenone
cyclohexanone
isophorone
2-hexanone (MBK)
methyl ethyl ketone (MEK)
methyl isobutyl ketone (MIBK)

Glycols

ethylene glycol
propylene glycol

Appendix 2
MSDS Summary

SAFETY DATA SHEETS - INDEX

PRODUCT	TAB #
1042JD Plus Coolant Concentrate	1
50/50 Heavy Duty Extended Life Antifreeze/Coolant	2
557 Silicone Lubricant	64
732 Multipurpose Sealant	116
A-9 Aluminum Cutting Fluid	117
Acetone	118
Acetylene Gas C ₂ H ₂	48
Acetylene in DMF Trailer Cylinder Gas C ₂ H ₂	49
AD 2000 Lubricant	65
Air Compressor Oil	66
Air Tool Lubricant	67
All Season Antifreeze Coolant Super Concentrate	3
Antifreeze Coolant	4
Antifreeze Coolant Bulk	5
Argon	50
Armorseal Floor Plex 7100 WB Epoxy Floor Coating Clear	119
Armorseal Floor Plex 7100 WB Epoxy Floor Coating Hardener	120
Atom ARC 7018 Hydrogen Welding Electrodes	121
Auto Transmission Fluid	68
Battery Acid Neutralizer Cleaner	11
Belt Dressing	12
Bio Circle L Parts Cleaner	13
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Bleach	14
Bleach Industrial	15
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Fuel stabilizer	44
Gasoline	45
Gear Oil 80W90	75
Gear Oil SAE 85W-140	76
Gojo Luxury Foam Handwash	29
Goof Off	30
Gunk Brake Parts Cleaner - Non Chlorinated	31
HD Deisel Antifreeze	9
Heavy Duty Clear Cement	128
Heavy Duty Moly 2 Grease	77
Highway Safety Marketing Spheres with Coating	129
Hydraulic Brake Fluid	78
Ice Melt	130
John Deere Hy-Gard Transmission and Hydraulic Fluid	79
Kleen All	32
Loctite 242 Threadlocker Medium Strength	131
Loctite 262 Threadlocker High Strength	132
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Appendix 3
RSR Reported Spills – 2021

**Richmond RSR SPILL LOG**

ALL SPILLS OVER 1L MUST BE RECORDED ON THIS SPILL LOG.

ANY SPILLS OVER 100L OR SPILLS IN WATER MUST ALSO BE IMMEDIATELY REPORTED VIA EMAIL TO THE SHECS MANAGER.

Date (DD/MM/YY)	Time	Area/Location Maintenance, Yard, MRP, NF etc.	Material Spilled	Measures Needed Spill pads, booms, floor dry, blocked off, etc (Include qty)	Est. Quantity	Equipment Involved Note 'N/A' if no equipment is involved	eg. hydraulic hose leak
3/02/21	15:30	Richmond - MRP	Hydraulic oil	Spill Pads	20L	944	Leak in containment tray
3/08/21	10:30	Richmond - Maintenance	Hydraulic oil	Floor Dry	10L	LH50	Hydraulic hose leak
4/08/21	14:00	Richmond-Maintenance	Hydraulic oil	Floor Dry & Spill pads	15L	Shop compressor	Hydraulic hose leak
4/13/21	11:30	Richmond-Yard	Hydraulic oil	Floor Dry & Spill pads	70L	Contractor truck	Hydraulic hose leak
4/22/21	14:30	Richmond -entrance to NF	Hydraulic oil	Floor Dry & Spill pads	6L	Rental Forklift	Hydraulic hose leak
4/05/21	7:30	Richmond-Yard	Coolant	Floor Dry	10L	LH50	Coolant hose leak
5/05/21	19:00	Richmond-Yard	Hydraulic oil	Spill Pads	60L	LH60	Hydraulic hose leak
5/13/21	12:30	Richmond-Yard	Hydraulic oil	Spill Pads/ Removal of soil	90L	LH60	Hydraulic hose leak
5/13/21	17:00	Richmond - Maintenance	Hydraulic oil	Floor Dry & Spill pads	70L	LH60	Hydraulic hose leak
5/17/21	8:30	Richmond Shredder Infeed	Hydraulic oil	Spill Pads	3L	LH 60	Fitting
5/22/21	7:00	Richmond At Stationary Shear Yard	Hydraulic Oil	Floor Dry	60L	LH60 New	Hydraulic Hose Leak
5/25/21	17:30	Richmond Aluminum bunker pad	Hydraulic Oil	Spill Pads	40L	Leiberr 944	Hydraulic Hose Leak
6/03/21	17:30	Richmond Shredder	Hydraulic oil	Floor Dry & Spill pads	90L	Bonnet Circuit shredder	Hydraulic Hose Leak
6/17/21	8:30	Richmond Aluminum ramp NF	Hydraulic oil	Floor Dry & Spill pads	15L	Leiberr 944	Hydraulic hose leak
7/10/21	10:30	Richmond Yard - receiving pad	Hydraulic oil	Floor Dry	20L	Scrap Hydraulic cylinder	Scrap cylinder leak
7/10/21	14:00	Richmond -SEDA	Diesel fuel	Floor Dry	20L	Fuel Tank attached to purchased trailer	scrap fuel tank
9/05/21	16:45	Richmond Receiving pad	Hydraulic oil	spill pads	20L	LH 50	Grapple hose failure
9/05/21	16:55	Richmond Receiving pad	Hydraulic oil	Floor dry & spill pads	50L	LH 60 New	Hydraulic hose leak
9/05/21	17:30	Richmond Receiving pad	Hydraulic oil	Floor dry & spill pads	20L	Lieherr 944	Hydraulic hose leak

Appendix 4
RSR Concrete Resurfacing Plan

PLOT DATE & TIME: 25/06/2021 8:37:40 PM USER NAME: ward.bowman
SAVE DATE & TIME: 25/06/2021 8:33:37 PM LOCATION: C:\USERS\WARD.BOWMAN\ONE DRIVE - ABILUC\INC\ARCH\ARCH\PROJECTS\1009_RSR\DRAWINGS\1009-01.DWG



ABBREVIATIONS

- RSR RICHMOND STEEL RECYCLING LTD
- c.m. CUBIC METERS
- s.m. SQUARE METERS

QUANTITIES

- CONCRETE REMOVAL AND REPLACE WORK IN THE OPEN
2795 sq.m.
- CONCRETE REMOVAL AND REPLACE UNDER CONVEYORS
126 sq.m.

NOTES

- ALL WORKS ARE TO BE COMPLETED TO VOLUME II OF MASTER MUNICIPAL SPECIFICATIONS PLATINUM EDITION 2009.
- CONCRETE IS TO BE 35 MPa WITH A MINIMUM OF 4.5 kg/c.m. TUFF STRAND FIBER OR APPROVED EQUAL. CONTRACTOR TO PROVIDE MIX DESIGN TO THE PROJECT MANAGER 1 WEEK PRIOR TO PLACING.
- CONCRETE IS 300mm THICK UNLESS NOTED OTHERWISE.
- CONTRACTOR TO CONTACT PROJECT MANAGER IF ANY SOFT SPOTS ARE ENCOUNTERED. SOFT SPOTS ARE TO BE REMOVED AND REPLACED WITH MMCD SGB.
- CONTRACTOR TO PLACE A LEVELING COURSE OF MMCD BASE MINIMUM 50mm THICK.
- MINIMUM GRADE IN SWALES IS 0.5% THE FIRST SIDE OF THE BOTTOM JOINT IS TO BE FORMED AND GRADES SET (0.5% = 10mm EVERY 2m). ALTERNATIVELY, A NARROW 1m WIDE BOTTOM CAN BE FORMED AND POURED FIRST.
- CONTOURS SHOWN IN SOLID SHOULD HAVE GRADE CONTROL SET ON A 4m GRID. USE OF 10mm REBAR FOR GRADE STAKES ARE ALLOWED PROVIDED THEY ARE POUNDED DOWN 200mm BELOW GRADE AFTER CONCRETE IS PLACED, AND PRIOR TO FINISHING.
- CONTOURS SHOWN AS DASHED ARE TO BE FIELD FIT BY STRING LINING TO EXISTING CONCRETE AND STRUCTURES. GRADE IS TO BE UNIFORM. DESIRED MINIMUM GRADE IS 1.0% (ABSOLUTE MINIMUM IS 0.5%).
- MAXIMUM GRADE ONSITE IS 4.0%.
- FINISH TO BE A HEAVY BROOM FINISH.
- SAW CUT JOINTS EVERY 4m ON AVERAGE. MODIFY CUTTING IN IRREGULAR AREAS TO ENSURE NO CUT OR FORMED EDGE IS SHORTER THAN 3m OR LONGER THAN 6m. WHERE POSSIBLE LINE UP ADJACENT SAW CUTS.
- ALL DIMENSIONS ARE IN METERS AND ALL ELEVATIONS ARE METERS ABOVE GEODETIC.

City of Richmond
8011 - 1st St. S. Road, Richmond, B.C. V6V 2G1

TITLE: RICHMOND STEEL RECYCLING
FY 22 CONCRETE WORKS
GRADING CONCRETE
REMOVAL AND REPLACEMENT

DESIGN	WVB	DWG. NO.	CI-01
DRAWN	WVB	SCALE	1:200
CHECKED	NB	DATE	2021-06-25



CONSULTANT:

REV	DATE	BY	CHK	DESCRIPTION
H				
G				
F				
E				
D				
C				
B				
A				

BENCHMARK
ALL ELEVATIONS ARE TO GEODETIC DATUM AND REFER TO CITY OF RICHMOND BENCHMARK NUMBER:
NORTH BOLT ON FIRE HYDRANT WEST SIDE OF MITCHELL ROAD, OPPOSITE #11580
ELEVATION 3.345m (GEODETIC) FIELD BOOK 1P
ALL MATERIALS AND CONSTRUCTION TO BE IN ACCORDANCE WITH THE CURRENT MASTER MUNICIPAL CONSTRUCTION DOCUMENTS (MMCD) AND THE CURRENT CITY OF RICHMOND SUPPLEMENTARY SPECIFICATIONS AND DETAIL DRAWINGS, UNLESS OTHERWISE NOTED.

Appendix 5

PGL Standard Methodologies

PGL'S GROUNDWATER SAMPLING METHODOLOGY

A – INTRODUCTION

A standardized sampling protocol has not yet been established by the BC Ministry of Environment (MOE). As the Contaminated Sites Regulation allows, PGL developed the following protocol with the aid of a variety of references including: the Canadian Council of Ministers of the Environment (CCME) document entitled *Guidance Manual on Sampling, Analysis, and Data Management for Contaminated Sites, Volume I: Main Report*, December 1993; BC MOE Guidance Document 1 – *Site Characterization and Confirmation Testing*; BC MOE Guidance Document 2 – *Statistical Criteria for Characterizing a Volume of Contaminated Material*; and BC MOE Guidance Document 12 – *Technical Guidance on Contaminated Sites Statistics for Contaminated Sites* (BC MOE Guidance Documents Updated 2005) and *British Columbia Field Sampling Manual*, 2013 Edition.

PGL maintains a group of detailed field protocols that are geared to providing consistent field results. Protocols are reviewed formally at one- or two-year intervals for technical currency, consistency with regulatory guidance and consistency with actual field practices. This document summarizes those protocols in the following sections:

- A. Introduction** – Outlines the referenced material and contents of the following protocols.
- B. Protocol Objective** – Offers an objective to following recognized and acceptable sampling protocol.
- C. Groundwater Sample Collection** – Provides groundwater collection protocols for sampling equipment, obtaining representative samples (procedures), transferring to appropriate containers, preservatives, and cleaning sampling equipment.
- D. Sample Labelling** – Includes our standard sample nomenclature used to identify key components (date, job number, unique ID, etc.) of the sample.
- E. Sample Recording** – Describes the information recorded in field notes including labelling (ID), water properties, and location.
- F. Sample Storage and Transport** – Describes sample preparation for transport.
- G. Chain of Custody** – Provides concise sample information for laboratory handling and analyses.

B – METHODOLOGY OBJECTIVE

The objective of the sampling methodology is to allow collection of samples that are consistent, representative, and repeatable, and to prevent cross-contamination.

C – SAMPLE COLLECTION

PGL's protocol for groundwater sample collection includes developing, purging and sampling steps. PGL's standard is to use well-dedicated Waterra inertial pump systems for development and peristaltic pumps for sampling all parameters. Well-dedicated polyethylene bailers may be used for slow recharge wells, and stainless steel bailers are sometimes used when high concentrations of solvents are expected. Management of development and purge water depends on site risks. Most often the water is drummed while other times it is disposed of onsite through treatment systems or the sanitary sewer.

Development

Wells are usually developed at the time they are installed or the next day. They are developed to reduce sediment content (to the extent possible) by surging (usually using surge blocks on a Waterra pump) and purging. We customarily use Waterra or electric centrifugal pumps for well development. PGL customarily removes at least three to five well volumes and may monitor purge water for:

Parameter	Objective
CONDUCTIVITY – mandatory	+/- 20µS/cm or +/- 3% whichever is higher
TEMPERATURE – optional	± 0.1°C
pH – mandatory	± 0.2 pH units
TURBIDITY – optional	10 NTU or qualitative

The well may also be considered developed if it has been pumped dry two to three times and the water obtained is relatively clear.

Purging and Sampling

After development, wells are left to geochemically and physically stabilize as long as practical, usually not less than 24 hours. Longer “relaxation” times are applied when project constraints allow or when non-aqueous phase liquid (NAPL) thickness is at issue. It is our experience that longer intervals result in more consistent (and so likely more representative) results, and shorter intervals lead to more false positives (high) results

The sampling tasks are:

- Measure the well headspace (where applicable) for volatile contaminants and methane;
- Measure the water level; and
- Check for NAPL using an optical interface probe, bailer, or reactive paste.

When testing the well headspace for volatile contaminants and methane, a combustible gas meter is used. For this test, all well openings are sealed for a minimum of 20 minutes to allow vapours to accumulate before measurements are performed.

PGL measures turbidity if sampling for sediment sensitive parameters (e.g., extractables such as PAH, EPH, phenols, etc.); turbidity target is <10 NTU.

If samples were collected using a peristaltic pump, each well was purged by the peristaltic pump at a low flow rate (0.2L/min to 0.5L/min) until stable chemistry objectives/targets, as outlined in development, were achieved. Following purging, samples were obtained with the peristaltic pump. Samples were placed directly from these apparatuses into the sample container except for metals samples, which are field filtered. PGL usually samples for sediment sensitive parameters first, and VOCs (which has low sediment sensitivity) last.

If samples were collected using Waterra, each well was purged a minimum of three well volumes. Following purging, samples were obtained with the Waterra. Samples were placed directly into the sample container except for metals samples, which are field filtered. PGL samples sediment-sensitive parameters (such as extractable petroleum hydrocarbons, polycyclic aromatic hydrocarbons and phenols) with bailers after purging with Waterra and ensures that the turbidity target (<10 NTUs) has been achieved prior to sampling.

If samples were collected using bailers, each well was purged a minimum of three well volumes. Following purging, samples were obtained with the bailer. Samples were placed directly into the sample container except for metals samples, which are field filtered. PGL usually samples for sediment sensitive parameters first, and VOCs (which has low sediment sensitivity) last.

Wells that did not recover sufficiently for sampling requirements during a normal field day were sampled from standing water (no purging).

Stable chemistry objectives/targets are the same as outlined in development.

Following purging, samples are obtained with the peristaltic pump or bailer. Samples are placed directly from these apparatuses into the sample container except for metals samples, which are field filtered. PGL usually samples for sediment sensitive parameters first, and VOCs (which has low sediment sensitivity) last.

Duplicate Samples

Duplicate samples are multiple (usually two) samples collected at the same location and time using the same procedure and equipment. Duplicate samples are collected to obtain the precision for each analyte analyzed within the collected sample. The observed variance will be the sum of the local environmental variance, the analytical variance, and the sampling variance. Duplicate samples are usually collected at a 10% frequency.

The relative percent difference (RPD) between duplicate samples is compared against the expected analytical variance (20%-50%) plus estimates of the environmental and sampling variance (usually 50% of the analytical variance). If RPD results exceed screening criteria, we investigate the cause and modify investigation and/or sampling procedures as required.

Sample Containers

Samples are transferred to laboratory-supplied sample containers, preservatives added to the samples when applicable, and stored on ice or cold packs until transported to the laboratory.

Samples for volatile contaminants are collected in zero-headspace septum vials with minimum turbulence and must be initially bubble-free to be acceptable. Since zero-headspace septum vials are vulnerable to breakage during sample handling and transport, vials are collected in duplicate. Samples for dissolved metals analyses are filtered in the field using dedicated filtering equipment, then preserved using concentrated nitric acid.

D – SAMPLE LABELLING

Samples are labelled before placement into the appropriate container. The containers are labelled with water-resistant ink on the lid and an adhesive label. The information included on the label is as follows:

- Date;
- Project number;
- Initial of the site inspector collecting the sample;
- A sample descriptor (i.e., BH_M for monitoring well); and
- A unique sample number.

E – SAMPLE RECORDING

The sample information recorded in the field notes includes the:

- Unique sample number (in notes and on the container);
- The location (i.e., monitoring well number);
- Location on a drawing or sketch;
- Sampling method (i.e., bailer, or Waterra with foot valve);
- Sampling type (i.e., whether sample is a filtered, or preserved); and
- Physical, visual, and olfactory characteristics.

PGL records the above sample information in a field book or monitoring well log form. PGL also takes date-stamped photographs for visual documentation of sample characteristics and contaminant indicators. Monitoring well locations are recorded in the field using measurements from permanent site features and/or a site survey is completed.

Recording of Sample Characteristics

PGL records such physical characteristics as colour, staining, sediment content, distinctive odours, sheen, and free product. These characteristics are important in the selection of different parameter analyses.

F – SAMPLE STORAGE AND TRANSPORT

Samples are transported to the laboratory within 48 hours of collection. The samples are kept cool on ice ($\leq 10^{\circ}\text{C}$) in an insulated cooler or container, and packed in a manner that prevents them from breakage during transport.

G – CHAIN OF CUSTODY

A Chain of Custody form accompanies the samples to the laboratory. The form includes information regarding the samples and the parameters to be analyzed. The form also includes information regarding the sequence of handling and transport of the samples to the laboratory.

Appendix 6
Environmental Impact Assessment

August 30, 2021
PGL File: 2160-10.09

Via E-mail: Karl.Gustafson@mcmillan.ca

McMillan LLP
Suite 1500 – 1055 West Georgia Street
Vancouver, BC
V6E 4N7

Attention: Karl Gustafson

**RE: ENVIRONMENTAL IMPACT ASSESMENT – RICHMOND STEEL RECYCLING
11760 MITCHELL ROAD, RICHMOND, BC**

PGL Environmental Consultants (PGL) is pleased to provide you with this Environmental Impact Assessment (EIA) in support of your *Water Sustainability Act* Approval Application for Richmond Steel Recyclers (RSR) onsite ditch remediation and restoration project in Richmond, BC (the Site).

1.0 BACKGROUND

Your client, RSR, currently operates a scrap metal recycling business which has an onsite drainage ditch flowing along the north and east boundary of the Site. Environment Canada and the City of Richmond have indicated that potential contaminants harmful to the environment may be leaving the Site, via the drainage ditch, and entering the Fraser River. Both regulatory agencies have requested RSR to produce a plan to eliminate potential contaminants from entering the receiving environment.

PGL has been retained to create a plan to eliminate and/or treat potential pollutants before entering the receiving environment.

The plan will include:

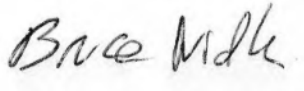
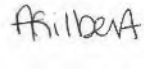
- Excavation and removal of sediment accumulation in the ditch;
- Construction of a detention pond and treatment system; and
- Construction of a new bioswale and restoration planting.

This EIA will provide information on:

- Professional accountability;
- The technical rationale for the proposed works;
- Potential impacts to aquatic values/components;
- Mitigation; and
- Compensation and mitigation monitoring.

2.0 PROFESSIONAL ACCOUNTABILITY

This submission has been signed off by certified professionals experienced in assessing fish and aquatic wildlife habitat impacts, mitigation, and offsets/mitigation associated with works in or about a stream and riparian disturbance.

Name	Accreditation and Registration	Signature	Portions of EIA Responsible for
Bruce Nidle	R.P.Bio./#881		All
Ashleigh Gilbert	P.Ag./#2816		All

3.0 RATIONALE

The proposed works are required to remove potentially contaminated sediment, construct a water treatment system, and restore an old, low functioning bioswale.

All alternatives to the proposed works (timing, location, extent, and methods of construction) have been considered to minimize the overall environmental impacts.

4.0 ASSESSMENT OF POTENTIAL IMPACTS TO AQUATIC VALUES/ COMPONENTS

The project has the potential to directly impact aquatic habitat within the drainage ditch as instream work will occur below the high-water mark.

To complete the overview environmental assessment, PGL:

- Reviewed orthophotographic/aerial imagery and available base maps of the Site, paying particular attention to watercourses, potential habitat areas, and general land uses and disturbance;
- Reviewed preliminary design drawings provided by Aplin & Martin Consultants;
- Identified fish-bearing watercourses near the Site, as indicated by internet-based federal and provincial databases (Fisheries and Oceans Canada (DFO) MAPSTER V3.1; BC Ministry of Environment & Climate Change Strategy Habitat Wizard, BC's Fisheries Information Summary System, and Fisheries Inventory Database Queries Tool);
- Reviewed the City's Interactive Map Application tool; and
- Reviewed distribution and habitat suitability characteristics for species at risk provided by the BC Conservation Data Centre and iMapBC.

To confirm the results of the desktop study, PGL conducted site visits on April 19 and 26, 2021. The site visits were performed by Qualified Environmental Professionals (QEPs) Ashleigh Gilbert, P.Ag. and Stephanie Louie B.Sc., R.P.Bio. Descriptions of the drainage ditch instream and riparian habitat follow in Section 4.1.

A summary of potential impacts is described in Section 4.3.

4.1 Richmond Steel Recyclers Onsite Ditch

The drainage ditch is approximately 150m long and daylighted southeast of the existing water/sediment separator on the northeast side of the RSR property on Mitchell Island in Richmond (Figure 1 – Drainage Plan). A 15m section of buried pipe drains the water/sediment separator into the bioswale which connects to the ditch. The ditch runs southeast along the property line for approximately 85m before veering south towards the Fraser River (Watershed Code: 100).

There are no known fish species recorded in the drainage ditch; however, the Fraser River supports: 5 species of salmon, 4 species of sculpin, 5 species of sucker, 4 species of trout, 3 species of lamprey, 3 species of dace, 2 species of whitefish, 2 species of minnow, 3 species of shiner, 2 species of chub, 2 species of sturgeon, 2 species of smelt, American Shad, Black Crappie, Bluegill, Brown Catfish, Burbot, Carp, Chiselmouth, Dolly Varden, Eulachon, Goldfish, Kokanee, Largemouth Bass, Northern Pikeminnow, Perch, Pumpkinseed, Signal Crayfish, Starry Flounder, Steelhead, Threespine Stickleback, and Western Pearlshell Mussel.

The habitat of the Site has been severely impacted by industrial activities onsite and from neighbouring properties. The habitat is dominated by Himalayan blackberry (*Rubus armeniacus*), with some common tansy (*Tanacetum vulgare*) and common horsetail (*Equisetum arvense*), and occasionally scotch broom (*Cytisus scoparius*), Canada goldenrod (*Solidago altissima*), unidentified aster and common dandelion (*Taraxacum officinale*) (Photographs 1 and 2). Patches of reed canarygrass (*Phalaris arundinacea*) and common cattail (*Typha latifolia*) were observed within the wetted portion of the ditch and the bioswale (Photograph 3). A single butterfly bush (*Buddleja davidii*) was observed near the outlet to the Fraser River. Young red alder (*Alnus rubra*) pole saplings characterize the south bank of the ditch along the retention wall north of the bend (Photograph 4), two young black cottonwood (*Populus balsamifera*) occupy the east bank at the ditch bend and a stand of few young black cottonwood and red alder grew at the ditch mouth.

The foreshore west of the ditch is mostly armoured with riprap and supported Himalayan blackberry and other non-native species including black locust (*Robinia pseudoacacia*), daphne laurel (*Daphne laureola*) and native black cottonwood and paper birch (*Betula papyrifera*) (Photograph 5).

Substrates within the drainage ditch consist of approximately 25cm of soft, brown silt overlaying angular gravel and cobbles (Photographs 6 and 7). Water within the drainage ditch was grey in colour and had a sheen on the surface (Photographs 8 and 9).

The riparian habitat may be used by nesting birds during the breeding season. While unlikely, aquatic wildlife such as northwestern salamander may use the riparian habitat and drainage ditch during early spring for breeding habitat. PGL will be onsite to conduct environmental monitoring and will survey the area for potential wildlife prior to work occurring.

4.1.1 Species at Risk

A non-confidential occurrence of White Sturgeon – Lower Fraser River Population (*Acipenser transmontanus* pop.4), a Species at Risk (SAR), was confirmed to occur in the Fraser River. The Site is located on the Fraser River North Arm, and the drainage ditch flows into the river. White Sturgeon – Lower Fraser River Population is Red-Listed in BC and have historically been identified from the mouth of the Fraser River to Hell's Gate BC Conservation Data Centre, 2021).

4.2 Project Description

Work will take place along the entirety of the constructed drainage ditch that flows along a portion of the northeast and east property boundaries of the RSR property. The initial work involves the remediation of impacted sediment within the ditch. Sampling results indicate sediment within the ditch contains levels of petroleum hydrocarbons, metals and select polychlorinated biphenyls that exceed applicable BC Contaminated Site Regulation standards and/or Canadian Council of Ministers of the Environment standards. The sediment remediation will involve excavating impacted sediment guided by the analytical results of confirmatory samples collected throughout the remediation process.

Once the remediation has been completed, the existing water/sediment separator will be replaced with a new water treatment system containing an oil water separator. The low-functioning bioswale will be converted to a detention pond, extending from the new oil water separator to the ditch bend. An iron and hydrocarbon treatment system will be constructed south of the ditch bend. Works within the ditch will be conducted in the dry.

4.3 Impacts to Downstream Habitat

The RSR onsite ditch remediation and restoration has the potential to impact downstream habitat by temporarily altering the hydrology of the system, increasing erosion and sedimentation, introducing and spreading invasive species and construction incidents.

Isolation of the work area in order to remove impacted sediment can cause temporary changes to water level downstream in the drainage ditch. There is a potential to impact fish and amphibian species, though fish are not anticipated in the ditch, by stranding during periods of low water levels.

The excavation and removal of sediment, construction of the new retention pond, installation of new water treatment infrastructure, and reconfiguration of the bioswale has the potential to introduce sediment and debris into the ditch and downstream habitat.

Vegetation removal (Himalayan blackberry, grasses, and the occasional exotic and invasive shrub or herb species) is expected during the work. Contaminated vehicles and equipment, the disturbance of invasive species, and the exposure of bare soil has the potential to spread and introduce invasive species to the work area and downstream habitat.

During construction, there is the potential for equipment and deleterious substances to enter the riparian and downstream habitat resulting in the unanticipated damage or destruction of habitat.

Section 5.0 discusses the mitigation measures to be implemented to prevent any impact to downstream and riparian habitat.

Instream work will be conducted under the supervision of a QEP, who will act as the Environmental Monitor (EM).

5.0 MITIGATION

Best management practices (BMPs) for working near watercourses will be implemented to reduce or eliminate the potential for sediment-related impacts to the riparian and instream habitat. BMPs to be implemented include, but are not limited to:

- Time work in water to respect timing windows to protect fish, including their eggs, juveniles, spawning adults, and/or the organisms upon which they feed;
- Minimize duration of in-water work;

- Conduct instream work during periods of low flow, or at low tide, to further reduce the risk to fish and their habitat or to allow work in water to be isolated from flows;
- Schedule work to avoid wet, windy, and rainy periods that may increase erosion and sedimentation;
- Design and plan activities and works in waterbody such that loss or disturbance to aquatic habitat is minimized and sensitive spawning habitats are avoided;
- Plan activities near water such that materials such as paint, primers, blasting abrasives, rust solvents, degreasers, grout, or other chemicals do not enter the watercourse;
- Develop a response plan that is to be implemented immediately in the event of a sediment release or spill of a deleterious substance and keep an emergency spill kit onsite;
- Ensure that building material used in a watercourse has been handled and treated in a manner to prevent the release or leaching of substances into the water that may be deleterious to fish;
- Develop and implement an Erosion and Sediment Control Plan (ESCP) for the Site that minimizes risk of sedimentation of the waterbody during all phases of the project. Erosion and sediment control measures should be maintained until all disturbed ground has been permanently stabilized, suspended sediment has resettled to the bed of the waterbody or settling basin and runoff water is clear. The plan should, where applicable, include:
 - Installation of effective erosion and sediment control measures before starting work to prevent sediment from entering the water body;
 - Measures for managing water flowing onto the Site, as well as water being pumped/diverted from the site such that sediment is filtered out prior to the water entering a waterbody. For example, pumping/diversion of water to a vegetated area, construction of a settling basin or other filtration system;
 - Site isolation measures (e.g., silt boom or silt curtain) for containing suspended sediment where in-water work is required (e.g., excavation, pump station removal and installation);
 - Regular inspection and maintenance of erosion and sediment control measures and structures during the course of construction;
 - Repairs to erosion and sediment control measures and structures if damage occurs; and
 - Removal of non-biodegradable erosion and sediment control materials once site is stabilized.
- Clearing of riparian vegetation should be kept to a minimum;
- Minimize the removal of natural woody debris, rocks, sand or other materials from the banks, the shoreline or the bed of the waterbody below the ordinary high-water mark. If material is removed from the waterbody, set it aside and return it to the original location once construction activities are completed;
- Immediately stabilize shoreline or banks disturbed by any activity associated with the project to prevent erosion and/or sedimentation, preferably through re-vegetation with native species suitable for the Site;
- Restore bed and banks of the waterbody to their original contour and gradient; if the original gradient cannot be restored due to instability, a stable gradient that does not obstruct fish passage should be restored;
- If replacement rock reinforcement/armouring is required to stabilize eroding or exposed areas, then ensure that appropriately sized, clean rock is used; and that rock is installed at a similar slope to maintain a uniform bank/shoreline and natural stream/shoreline alignment;
- Remove all construction materials from site upon project completion;
- Retain a QEP to ensure applicable permits for relocating fish are obtained and to capture any fish trapped within an isolated/enclosed area at the work site and safely relocate them to an appropriate location in the same waters. Fish may need to be relocated again, should flooding occur on the Site;
- Ensure that machinery arrives onsite in a clean condition and is maintained free of fluid leaks, invasive species, and noxious weeds;

- Whenever possible, operate machinery on land above the high-water mark, on ice, or from a floating barge in a manner that minimizes disturbance to the banks and bed of the waterbody; and
- Wash, refuel, and service machinery and store fuel and other materials for the machinery in such a way as to prevent any deleterious substances from entering the water.

Additional BMPs found in the following documents will be implemented whenever possible:

- Standards and Best Practices for Instream Works (Ministry of Water Land and Air Protection, 2004);
- Develop with Care 2014: Environmental Guidelines for Urban and Rural Land Development in British Columbia (Government of British Columbia, 2014);
- Land Development Guidelines for the Protection of Aquatic Habitat (DFO, 1992); and
- General Operational Best Practices (Ministry of Environment, 2019a).

A Construction Environmental Management Plan (CEMP) will be prepared by a PGL QEP. It will incorporate the above BMPs and an ESCP (including silt fencing and other erosion-control products), and requirements for environmental monitoring. The CEMP will: identify types of fluid used; ensure that environmentally safe alternatives are incorporated where possible; ensure proper disposal of excavated material; and list measures to prevent materials entering the drainage ditch. Authorization to proceed with construction will not be given until the project team is completely satisfied that the excavation and installation does not negatively impact the environment.

Project component design and implementation of mitigation measures will serve to reduce/mitigate impacts to instream and riparian habitat as much as possible.

5.1 Project Component Design

Project components have been designed to:

- Minimize direct and indirect impacts to the active floodplain of the drainage ditch channel;
- Minimize direct and indirect impacts to the riparian area and associated vegetation; and
- Minimize direct and indirect impacts to spawning, rearing, and overwintering areas for fish; and
- Minimize direct and indirect impact to wildlife and wildlife habitat.

Work occurring within the drainage ditch will include dredging of contaminated sediments, removal of old infrastructure, installation of new infrastructure and the infilling and realignment of the ditch itself, which has the potential to adversely impact the drainage ditch and associated riparian habitat.

The work is scheduled to begin in Spring 2023, when weather conditions are expected to be favourable.

5.2 Instream and Riparian Works

Instream and bank work in the drainage ditch should take place during the same timing windows for the Fraser River works (**June 16 to February 28**) as per the requirement: *British Columbia Marine/Estuarine Timing Windows for the Protection of Fish and Fish Habitat – South Coast and Lower Fraser Areas* (DFO 2014). Fish are not anticipated to be present within the drainage ditch; however, an EM will be present to address and mitigate any incidental fish occurrences. Downstream impacts to the Fraser River will be mitigated by work occurring in an isolated section of the drainage ditch, in the dry.

Excavation may also cause instability of the slopes as the ditch is exposed during the remedial excavation of contaminated sediment.

Erosion and sediment control measures will be in place, as per the CEMP and ESCP described above in Section 5.0.

Tree protection fencing will be installed around existing trees to be retained onsite.

5.3 Fish and Wildlife Salvages

Vegetation removal is expected to occur outside the Least-Risk Window for passerines in BC, which is September 1 to February 28 (Government of BC, 2014). As such, there is a risk of disturbing nesting birds during vegetation removal and ground disturbance. A QEP will perform a pre-clearing nest survey prior to any vegetation removal at the Site, to ensure bird nests are not disturbed during the work. If possible, vegetation will be trimmed prior to the nesting season to reduce the risk of nesting at the Site.

While not anticipated, isolation of the work area in the drainage ditch may be required to allow work to occur in the dry. The site will be isolated using sheet piling, and any fish or wildlife in the work area will be salvaged by QEPs using nets. The Site will be pumped down and the salvage will continue as spot checks until the work area is dry. Fish are not anticipated to be in the ditch; however, a salvage will occur for due diligence should there be any coarse fish species within the ditch.

A QEP will be acting as the EM during the works. The EM will ensure that the works do not impact incidental occurrences of fish and wildlife at the site.

5.4 Spill Containment

As part of the CEMP, a spill response plan will be prepared, as well as an in-stream works plan. These response and contingency plans will incorporate BMPs as described above in Section 5.0. A spill containment kit will be readily available onsite in the event of a release of a deleterious substance to the environment. Crews will be familiar with the use and deployment of spill containment products.

5.5 Surface Erosion

The banks and riparian areas adjacent to the drainage ditch will be protected from surface erosion through the installation of erosion and sediment control fencing along the top of bank. Erosion and sediment control fencing will prevent work debris and materials from entering the riparian areas.

5.6 Construction Monitoring

All construction activities will be monitored by a QEP full-time during start-up and on a regular basis (as prescribed by the CEMP) throughout the Project works. The EM will be provided with written authority to modify and/or halt any construction activity if deemed necessary for the protection of fish and wildlife populations or their habitats.

6.0 COMPENSATION AND MITIGATION MONITORING

Table A: Permanent Habitat Impact Calculations (Impact Figures 1 and 2)

	Impacts (m ²)	Compensation (m ²)	Net Impacts (m ²)
Riparian	100	50	-50
Instream	700	250	-450
Total	800	300	-500

6.1 Residual Environmental Impacts

The Project is not expected to cause net residual environmental impacts. Even with the loss of poor-quality instream and riparian habitat, impacts to the drainage ditch are considered positive, as severely impacted sediment will be removed from the system and an upgraded water treatment system will be installed to prevent recontamination. All work will take place within the previously impacted, existing constructed drainage ditch.

6.2 Mitigation Monitoring Plan

An environmental monitoring plan will be part of the CEMP to monitor the mitigation measures during the construction activities related to the Project. The monitoring plan will include implementation and effectiveness monitoring to determine if mitigations measures have been implemented as proposed, such as ensuring the erosion and sediment control plan is in place and functioning as intended. The QEP conducting the environmental monitoring will also be required to assess the Site for compliance with conditions of the Approval and any regional, provincial, or federal environmental legislation. No additional monitoring after the Project work is completed is anticipated.

7.0 CONCLUSIONS AND RECOMMENDATIONS

The proposed sediment remediation and water treatment system upgrade is considered to have minimal to no residual impact on the surrounding environment. Impacts to the drainage ditch are considered positive, even though there is a loss of habitat, as impacted sediment will be removed from the system and an upgraded water treatment system will prevent recontamination. Habitat at the Site is poor due to the dense monoculture of Himalayan blackberry and reed canary grass along the ditch.

To mitigate any potential adverse effects to the environment, PGL recommends implementing:

- A CEMP;
- An ESCP (to be included in the CEMP); and
- Full time environmental monitoring of remediation and construction works by a QEP during initial excavation, and on a regular basis throughout the sediment removal and water treatment system replacement process

8.0 STATEMENT OF LIMITATIONS AND CONDITIONS FOR REPORT

Complete Report

All documents, records, data and files, whether electronic or otherwise, generated as part of this assignment are a part of the Report, which is of a summary nature and is not intended to stand alone without reference to the instructions given to PGL by the Client, communications between PGL and the Client, and any other reports, proposals or documents prepared by PGL for the Client relative to the specific site described herein, all of which together constitute the Report.

In order to properly understand the suggestions, recommendations and opinions expressed herein, reference must be made to the whole of the Report. **PGL is not responsible for use by any part of portions of the Report without reference to the whole report.**

Basis of Report

The Report has been prepared for the specific site and purposes that are set out in the contract between PGL and the Client. The findings, recommendations, suggestions, or opinions expressed in the Report are only applicable to the site and purposes in relation to which the Report is expressly provided, and then only to the extent that there has been no material alteration to or variation from the information provided or available to PGL.

Use of the Report

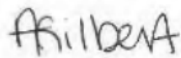
The information and opinions expressed in the Report, or any document forming part of the Report, are for the sole benefit of the Client. No other party may use or rely upon the Report or any portion thereof without PGL's written consent, and such use shall be on terms and conditions as PGL may expressly approve. Ownership in and copyright for the contents of the Report belong to PGL. Any use which a third party makes of the Report, is the sole responsibility of such third party. **PGL accepts no responsibility whatsoever for damages suffered by any third party resulting from use of the Report.**

9.0 CLOSING

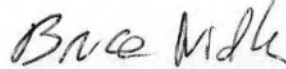
We trust that this meets your needs. If you have any questions or require clarification, please contact Ashleigh Gilbert or Bruce Nidle at 604-235-8025 and 604-895-7609, respectively.

PGL ENVIRONMENTAL CONSULTANTS

Per:



Ashleigh Gilbert, M.Sc., P.Ag.
Environmental Consultant



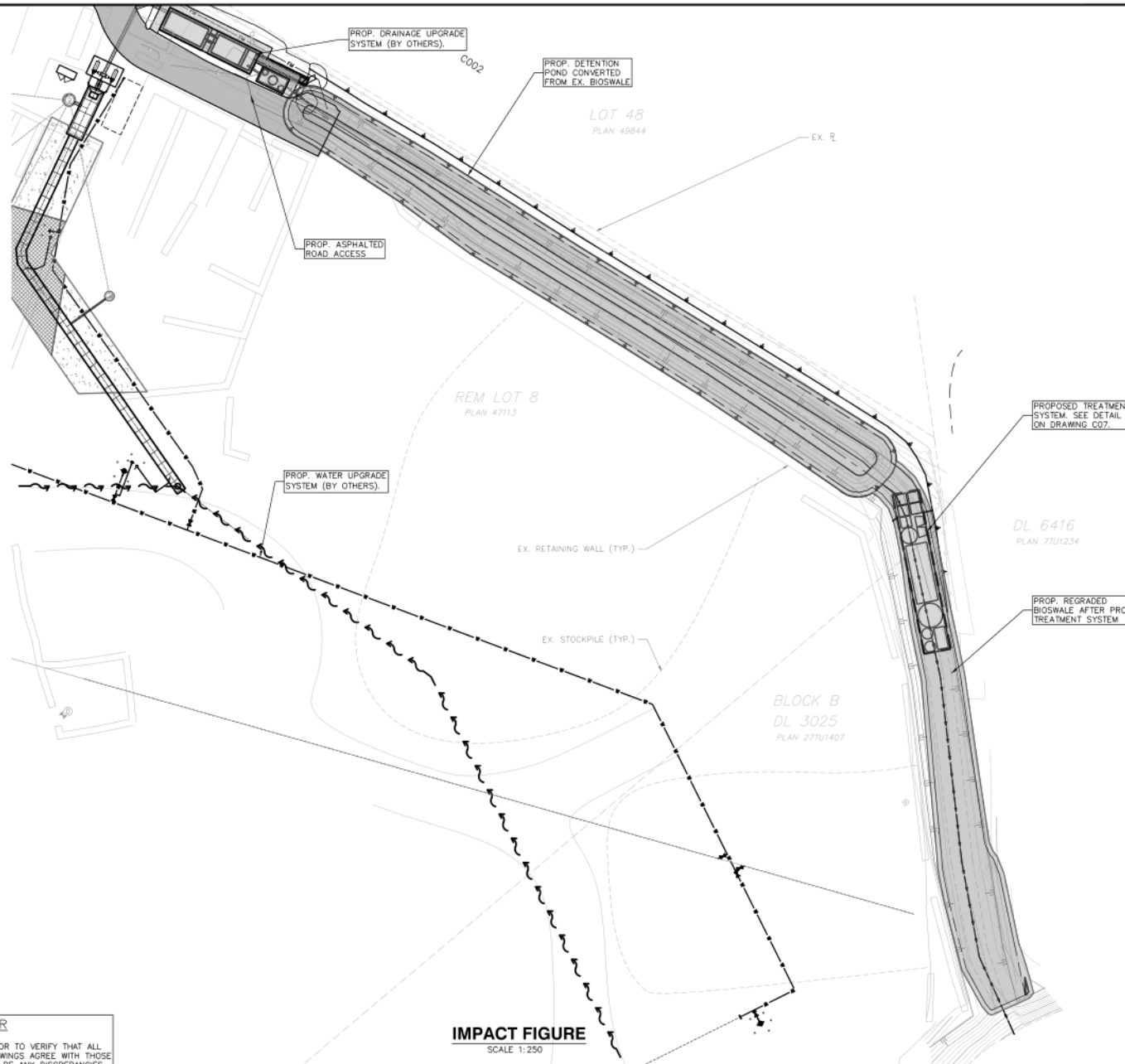
Bruce H. Nidle, B.Sc., R.P.Bio.
Senior Environmental Consultant

AAG/BHN/slr
V-2160-10-09-EIA-v1.docx

Attachments: Impact Figures
Site Drainage Figure
Site Photographs

10.0 REFERENCES

- BC Conservation Data Centre (CDC) 2021. BC Species and Ecosystems Explorer. Available at: <http://a100.gov.bc.ca/pub/eswp/>. Accessed April 2021.
- Fisheries and Oceans Canada. 1992. *Land Development Guidelines for the Protection of Aquatic Habitat*. 128 Pages.
- Fisheries and Oceans Canada. 2014. British Columbia Marine/Estuarine Timing Windows for the Protection of Fish and Fish Habitat - South Coast and Lower Fraser Areas. Available at: <http://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/bc-s-eng.html#area-28>. Accessed April 2021.
- Government of British Columbia. 2014. *Develop with Care 2014: Environmental Guidelines for Urban and Rural Land Development in British Columbia*.
- Ministry of Environment. 2019a. *General Operational Best Practices*. Available at: <http://www.env.gov.bc.ca/wld/instreamworks/generalBMPs.htm>. Accessed April 2021.
- Ministry of Environment. 2019b. *Pipeline Crossing or Maintenance Specific BMPs*. Available at: <http://www.env.gov.bc.ca/wld/instreamworks/pipelinecrossings.htm>. Accessed April 2021.
- Ministry of Water Land and Air Protection. 2004. *Standards and Best Practices for Instream Works*. Ecosystems Standards and Planning Biodiversity Branch. 168 Pages.



RIPARIAN IMPACTS
TEMPORARY $\approx 50m^2$
PERMANENT $\approx 100m^2$

INSTREAM (BELOW HWM) IMPACTS
TEMPORARY $\approx 250m^2$
PERMANENT $\approx 450m^2$



NOTICE TO CONTRACTOR

IT IS THE RESPONSIBILITY OF THE CONTRACTOR'S SURVEYOR TO VERIFY THAT ALL LEGAL SURVEY DIMENSIONS SHOWN ON THE ENGINEERS' DRAWINGS AGREE WITH THOSE ON THE REGISTERED LEGAL SURVEY PLAN. SHOULD THERE BE ANY DISCREPANCIES, THEN IMMEDIATELY NOTIFY THE ENGINEER OF RECORD.

LEGAL DESCRIPTION:

REV. NO.	DESCRIPTION	DR	CH	DATE	APP
0	ISSUED FOR COORDINATION	TITS	LO'C	15/07/21	LO'C
1	ISSUED FOR FLNRORD REVIEW	TITS	LO'C	23/08/21	LO'C



Aplin & Martin Consultants Ltd.
201 - 12448 82 Avenue, Surrey, B.C. Canada V3W 3E9
Tel: (604) 597-9058, Fax: (604) 597-9061, Email: general@aplinmartin.com

CLIENT:

PGL ENVIRONMENTAL CONSULTANTS
1500 - 1185 West Georgia Street Vancouver, BC V6E 4E6
PH: (604) 682-3707

PROJECT:

RICHMOND STEEL - DITCH REMEDIATION
11760 Mitchell Rd, Richmond, BC V6V 1V8

DRAWN: TITS

DESIGN: TITS

CHECK: LO'C

APPR: LO'C

SCALE:

HORZ: 1:100

VERT: N/A

TITLE:

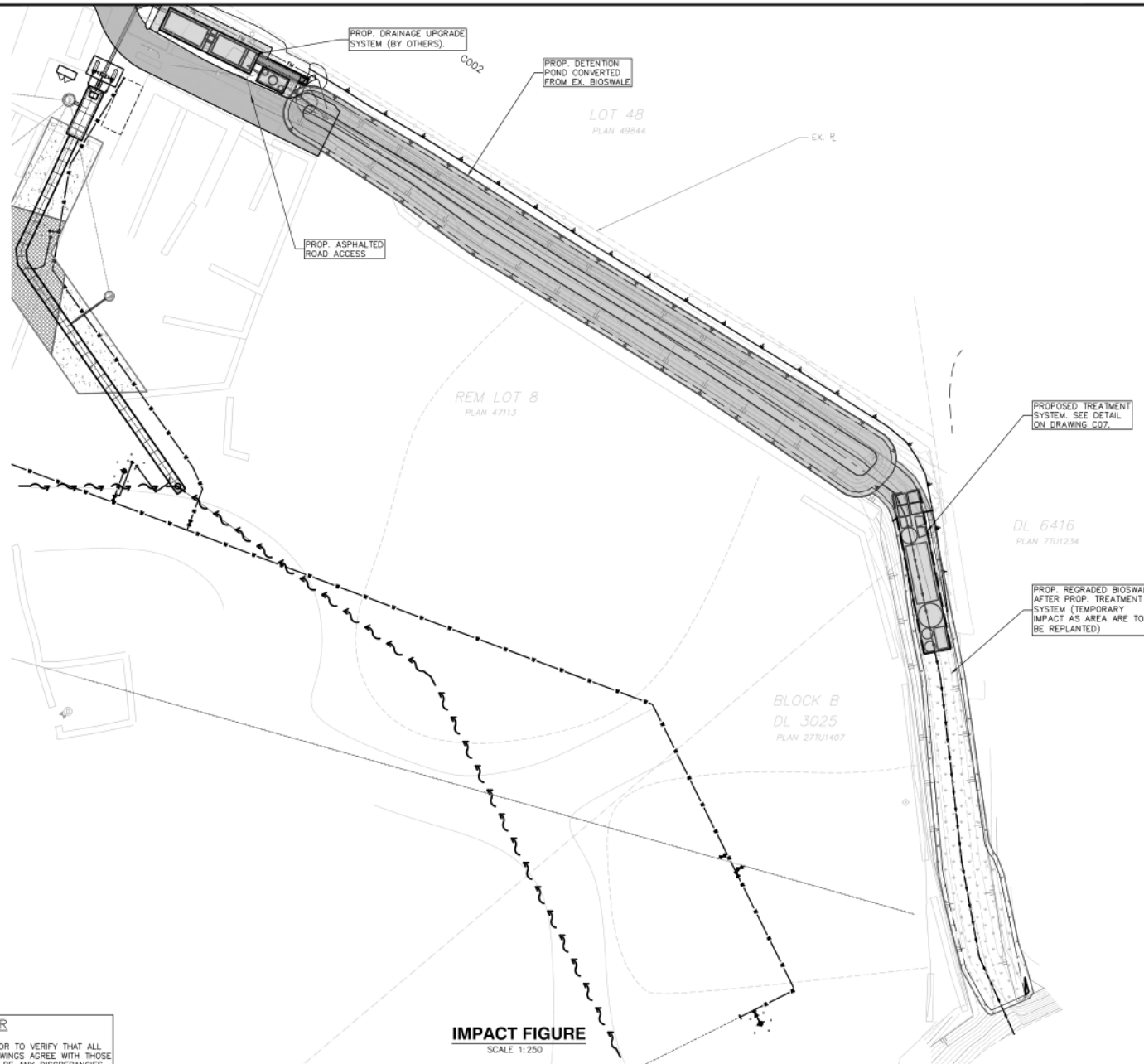
IMPACT FIGURE 1

DATE: MAY, 2021

SHEET: 1 of 2

SHEET NO. REV.

21-5060 - 01 1



RIPARIAN PLANTING
AREA \approx 50m²

INSTREAM PLANTING
AREA \approx 250m²

NOTICE TO CONTRACTOR

IT IS THE RESPONSIBILITY OF THE CONTRACTOR'S SURVEYOR TO VERIFY THAT ALL LEGAL SURVEY DIMENSIONS SHOWN ON THE ENGINEERS DRAWINGS AGREE WITH THOSE ON THE REGISTERED LEGAL SURVEY PLAN. SHOULD THERE BE ANY DISCREPANCIES, THEN IMMEDIATELY NOTIFY THE ENGINEER OF RECORD

LEGAL DESCRIPTION:

B.M.	MONUMENT NO.	STREET &	AVENUE	ELEVATION:	DR	CH	DATE	APP
REV. NO.	DESCRIPTION				TTTS	LO'C	15/07/21	LO'C
0	ISSUED FOR COORDINATION				TTTS	LO'C	23/08/21	LO'C
1	ISSUED FOR FLNRORD REVIEW							



Aplin & Martin Consultants Ltd.
201 - 12448 82 Avenue, Surrey, B.C. Canada V3W 3E9
Tel: (604) 597-9558, Fax: (604) 597-9061, Email: general@aplinmartin.com

CLIENT:

PGL ENVIRONMENTAL CONSULTANTS
1500 - 1185 West Georgia Street Vancouver, BC V6E 4E6
PH: (604) 682-3707

PROJECT:

RICHMOND STEEL - DITCH REMEDIATION
11760 Mitchell Rd, Richmond, BC V6V 1V8

DRAWN: TTTS

DESIGN: TTTS

CHECK: LO'C

APPR: LO'C

SCALE :

HORZ: 1:100

VERT: N/A

TITLE:

IMPACT FIGURE 2

DATE: MAY, 2021

SHEET: 2 of 2

SHEET NO. REV.

21-5060 - 02 1



										D SHEET SCALE SHOWN		ENGINEERING AND PERMIT STAMPS (As Required)		CUSTOMER		<div>Advisian</div> <div>Richmond Steel Recycling</div> <div>MAIN YARD</div> <div>EXISTING DRAINAGE</div> <div>LOCATE / SURVEY SCOPE</div>	
										<div>OneWay</div> <div>to zero hertz</div>		<div>PRELIMINARY</div> <div>DO NOT USE FOR CONSTRUCTION</div> <div>Last Saved: Oct. 29/20 4:32pm</div>		<div>RICHMOND STEEL RECYCLING</div> <div></div>			
										WORLEY PROJECT No		307071-01309		DRG No			
B	09-OCT-20	ISSUED FOR INFORMATION				LAV	-	WVB	-	HY	-						
A	18-SEP-20	ISSUED FOR INFORMATION				LAV	-	WVB	-	HY	-						
REV	DATE	REVISION DESCRIPTION				DRAWN	DRAFT CHK	DESIGNED	ENG CHK	APPROVED	CUSTOMER	REF DRAWING No	REFERENCE DRAWING TITLE				



Photograph 1:

**Richmond Steel Recyclers
onsite ditch south of the bend,
looking northeast.**



Photograph 2:

**Himalayan blackberry and reed
canary grass growing within
and along the ditch south of
the bend.**



Photograph 3:

Cattails and Himalayan blackberry in the bioswale.



Photograph 4:

Red alder pole saplings, horsetail and Himalayan blackberry along the ditch, adjacent to the retaining wall.



Photograph 5:

**Richmond Steel Recyclers
onsite ditch outfall into the
Fraser River.**



Photograph 6:

**Water conditions within the
ditch downstream of the
bioswale.**



Photograph 7:

**Water conditions in the ditch
downstream of the bend.**



Photograph 8:

**Sediment conditions within the
ditch about 15m upstream of
the outfall.**



Photograph 9:

Sediment conditions within the bioswale.

2021-11-30 Pollution Prevention Order Amendment

From: Enick, Oana V ENV:EX
To: Harbinder Dhillon <HDhillon@richmondsteel.ca>, Steven Kynoch <SKynoch@richmondsteel.ca>, Karl Gustafson <Karl.Gustafson@mcmillan.ca>
Cc: Compliance Admin ENV:EX <Compliance.Admin@gov.bc.ca>, Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>, wmills@richmond.ca, Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>, Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>
Sent: November 30, 2021 2:38:32 PM PST
Attachments: 2021-11-30 Amdt 3 PPO110800.pdf, image001.png, image005.jpg, image006.jpg, image003.jpg, 2021-11-07 Amended Order Appendices Nov 2021.pdf
Hello:

Please see the attached amended Pollution Prevention Order 110800 and the amended order appendices.

Please acknowledge receipt of this email by replying to this message (please "reply to all").

In doing so, you are confirming that you are able to read its contents and open all attachments.

If you are not able to open the attachments, please indicate this immediately as this may affect legislated time limits that prescribe your rights or obligations.

Regards,



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).



August 5, 2021
Amended: August 10, 2021
Amended: September 1, 2021
Amended: November 30, 2021

Order Number: 110800

Via email: skynoch@richmondsteel.ca and HDhillon@richmondsteel.ca

Richmond Steel Recycling Limited
11760 Mitchell Road
Richmond, BC V6V 1V8

Attention: Steven Kynoch, Regional SHECS Manager and Harbinder Dhillon, President

Pollution Prevention Order – Richmond Steel Recycling Ltd.

This Order is being issued under Section 81 of the *Environmental Management Act* (EMA), SBC 2003, C. 53. **This Order supersedes the versions issued on August 5, 2021, August 10, 2021, and September 1, 2021.** I am satisfied on reasonable grounds that an activity at Richmond Steel Recycling Ltd. (Richmond Steel) located at 11760 Mitchell Road, Richmond, British Columbia (the Site) is being performed by a person in a manner that is likely to release effluent that will cause pollution. Specifically, the Richmond Steel facility is located on the described land parcel:

Lot 8 Except Part Plan 49844 District Lot 459 Group 1 New Westminster
District Plan 47113

GROUNDINGS FOR ISSUANCE

I am satisfied that Richmond Steel is a person who:

- previously had or now has possession, charge or control of the substance;
- previously did anything, or who is now doing anything, which may cause the release of the substance; or
- previously owned or occupied, or now owns or occupies, the land on which the substance is located.

The substance likely to be released in a manner that will cause pollution is effluent from a facility classified in the *Waste Discharge Regulation* Schedule I as a “Commercial Waste Management and/or Waste Disposal Industry” and/or “Hazardous Waste Management” and in Schedule II as a “Vehicle Dismantling and Recycling Industry”.

As per their Environmental Management Plan (2021) (EM Plan), Richmond Steel, “a joint venture between Sims Metal Management and Nucor Corporation, has been operating since the early 1970s, [with] the primary onsite operations including metal recycling, wet vehicle handling and recycling, mobile car crushing, industrial bin services, building demolishing, and maritime salvage”. As per their Drainage & Mitigation Plan (2021) (D&M Plan), all stormwater on the site is directed to the bioswale area and ditch which flows directly into the Fraser River.

On December 12, 2019, Environment and Climate Change Canada (ECCC) enforcement staff “witnessed a pool of sediment-laden water with a grey sheen on its surface... directly adjacent to the Fraser River...” and “witnessed sediment-laden water with a grey sheen flowing from the aforementioned pool of water towards the Fraser River and discharging directly into the Fraser River from the foreshore of the property”. ECCC staff further “witnessed a grey sheen spreading across the surface of the Fraser River, originating at the flow of water discharging from foreshore of the property” (ECCC Warning Letter).

ECCC staff collected samples “from the aforementioned flow of water into the Fraser River and from a treatment ditch on the East side of the property”, flowing into the Fraser River. These samples were analysed at the ECCC, Pacific & Yukon Laboratory for Environmental Testing and ECCC shared the results with the Ministry of Environment and Climate Change Strategy (Ministry). The results showed levels of aluminum, copper, zinc, polychlorinated biphenyl (Arochlor-1242), naphthalene, benz(a)anthracenes, and pyrene to be above British Columbia Water Quality Guidelines (BCWQG), as listed in the summary table below (Table 1):

Table 1: Summary Table of ECCC samples collected on December 12, 2019. (Grey highlights indicate values either below BCWQG or between phototoxic and non-phototoxic). Source: 2020-01-28 V19L036_1 Detailed ECCC Results

Parameter	ECCC Results Bioswale	ECCC Results Shore/Dock	BCWQG
COD	506 mg/L	472 mg/L	
TSS	271 mg/L	2170 mg/L	
Aluminum (dissolved)	0.11 mg/L	0.12 mg/L	0.1 Acute mg/L 0.05 Chronic mg/L
Copper dissolved (mg/L)	0.45 mg/L (pH 7.3, Hardness 130, DOC 10*) *mid-range estimate for DOC	0.010 mg/L (pH 7.9, Hardness 150, DOC 10*) *mid-range estimate for DOC	0.0179 Acute mg/L 0.00298 Chronic mg/L 0.0348 Acute mg/L 0.00594 Chronic mg/L
Zinc, total (mg/L)	2.46 mg/L	14.6 mg/L	0.063 Acute mg/L 0.0375 Chronic mg/L
PCB, total (µg/L)	10.1 µg/L = 10100 ng/L	20.8 µg/L = 20800 ng/L	0.1 ng/L Acute (HWR = 0.005 mg/L = 5000ng/L)
Naphthalene (ug/L)	4.97 µg/L	0.52 µg/L	1 µg/L
Benz(a)anthracenes (ug/L)	0.44 µg/L	0.49 µg/L	0.1 µg/L Chronic
Fluoranthene	0.65 µg/L	1.12 µg/L	0.2 µg/L Phototoxic 4 µg/L Non-phototoxic
Pyrene	0.70 µg/L	1.14 µg/L	0.02 µg/L Chronic

In response to ECCC's findings, "RSR retained Pottinger Gaherty Environmental Consultants Ltd. (PGL) to develop a Stormwater Management and Mitigation Plan (the Stormwater Plan) [that] included undertaking additional investigation of site conditions to help inform RSR's decisions as to the steps required to manage stormwater effectively" (Update Letter, March 15, 2021).

In May 2021, Richmond Steel submitted updated D&M and EM Plans. Neither documents include sampling specifics or analytical results and neither documents propose an on-going sampling, monitoring, and reporting schedule (D&M Plan, 2021 and EM Plan, 2021).

On July 2, 2020, Ministry staff conducted an inspection of the Richmond Steel facility and assessed compliance with the *Hazardous Waste Regulation* (HWR), Section 17(1)(b), as not-determined because facility staff were unable to locate sample records. Richmond Steel staff later reported in a July 15, 2020, email that they "did not find any reports or records of a storm water sampling program". The inspection report concludes that "there were no sample records".

On April 26, 2021, Ministry staff again requested the sampling records to demonstrate compliance with HWR, Section 17(1)(b), and no records were provided. In direct response to the issue of HWR, Section 17(1)(b) records, Richmond Steel stated in a May 7, 2021, email – Compliance Advisory Table that "Richmond Steel Recycling is not a Hazardous Waste Storage facility" but do acknowledge in that same email that 'Sch. 1.2 does apply to the discharge' (email, May 7, 2021).

On March 23, 2021, in an update letter to the City of Richmond, Mr. Keith Gagne, P.Eng, of PGL Environmental Consultants suggests that potential pollution is ubiquitous throughout the site and is on-going "PCBs were non-detect (N.D.) in the soil samples; however, surface water throughout the Site exceeded BC Water Quality Guidelines. RSR was unable to isolate the PCB impacts to one area. It appears that the low levels of PCBs are likely related to ongoing activities, regardless of the controls RSR has or might reasonably put in place to prevent PCB materials from entering the Site."

Between September 1, 2021 and the date of this amendment and consistent with requirements of this Order, RSR has submitted multiple documents. These documents confirm activities and operations at the Site and identify various contaminants of potential concern and their ubiquitous presence on the Site and in the effluent.

Based on this information, I am satisfied on reasonable grounds that this activity/operation is being performed in a manner that is likely to release a substance that will cause pollution. Furthermore, I conclude that an amendment of this Order is required, as follows:

ORDER

Pursuant to Section 81 of the *Environmental Management Act* [SBC 2003] Chapter 53, Richmond Steel is hereby ordered to comply with the required actions listed in the table below and to provide information to the Director indicating the completion of each action.

Item	Required Action	Required by midnight on:						
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"Qualified Professional" means an applied scientist or technologist specializing in a particular applied science or technology, including agrology, biology, chemistry, engineering, geology or hydrogeology, who (a) is registered in British Columbia with the professional organization responsible for his or her area of expertise, acting under that professional association's code of ethics and subject to disciplinary action by that association, and (b) through suitable education, experience, accreditation and knowledge, may be reasonably relied on to provide advice within his or her area of expertise as it relates to this order, or (c) is approved by the Director.

DUTY TO COMPLY

The requirements above must be completed on or before the associated "Required By" date. Failure to comply with the requirements of this order is a contravention of the *Environmental Management Act* [SBC 2003, c.53] and may result in legal action. I direct your attention to Section 120(10) of the *Environmental Management Act*, which reads:

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This order will also appear in the Ministry of Environment's Quarterly Environmental Enforcement Summary and Environmental Violations Database.

MINISTRY CONTACT

If you have any questions, please contact the undersigned at Dan.Bings@gov.bc.ca or Environmental Protection Officer Oana Enick at 236-468-2231 and Oana.Enick@gov.bc.ca.

Regards,



Daniel P. Bings
for Director, *Environmental Management Act*
Compliance Operations Manager

Attachments:
2021-11-07 Amended Order Appendices Nov 2021

cc:

Alan W. McCammon, MSc, PGeo
Manager, Remediation Assurance and Brownfields
BC Ministry of Environment & Climate Change Strategy
Suite 200 – 10470 152nd Street, Surrey, BC, V3R 0Y3
Alan.Mccammon@gov.bc.ca

Catherine Allard
Senior Authorizations Officer, South Coast Regional Office
Ministry of Forests, Lands & Natural Resources Operations and Rural Development
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Gregory Lee
Inspector and Fishery Officer, Environmental Enforcement Directorate
Enforcement Branch, Environment and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street, Vancouver, BC, V6C 3S5
Gregory.lee3@canada.ca

Warren Mills
Environmental Coordinator
6911 No. 3 Road, Richmond, BC V6Y 2C1
wmills@richmond.ca

2021-12-13 Pollution Prevention Order Amendment

From: Enick, Oana V ENV:EX
To: Harbinder Dhillon <HDhillon@richmondsteel.ca>, Karl Gustafson <Karl.Gustafson@mcmillan.ca>
Cc: Compliance Admin ENV:EX <Compliance.Admin@gov.bc.ca>, Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>, wmills@richmond.ca, Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>, Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>
Sent: December 13, 2021 12:30:17 PM PST
Attachments: 2021-11-07 Amended Order Appendices Nov 2021.pdf, image003.jpg, image005.jpg, image006.jpg, image001.png, 2021-12-13 Amdt 4 PPO110800.pdf
Hello:

In response to RSR's latest concern regarding sampling parameters, the Director amended Pollution Prevention Order to refer to sampling parameters in Item 1, for which there are Approved or Working Water Quality Guidelines. Please see the attached amended Pollution Prevention Order 110800 and the amended order appendices (no changes were made to the Appendices).

Please acknowledge receipt of this email by replying to this message by selecting "Reply All". Please write "received" in the email body as confirmation within 5 business days. In doing so, you are confirming that you are able to read its contents and open all attachments. If you are not able to open the attachments, please indicate this immediately as this may affect legislated time limits that prescribe your rights or obligations.

Regards,



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

Pollution Prevention Order 110800 – November 5, 2021 Amendment: Appendices A and B

Appendix A: Sampling Locations (Source: Waste Characterization Plan, October 2021)



BC Ministry of Environment and Climate Change Strategy
Pollution Prevention Order 110800 November 30, 2021 Amendment
Appendices A and B

Appendix B: Expanded List of Contaminants of Potential Concern

(as listed in Waste Characterization Plan, October 2021)

Petroleum Hydrocarbons (PHCs)

LEPH	HEPH	VHw6-10
VPH	benzene	toluene
ethylbenzene	xylene	MTBE

Polycyclic Aromatic Hydrocarbons (PAHs)

acenaphthene	anthracene	benz(a)anthracene
benzo(a)pyrene	benzo(b+j)f uoranthene	benzo(ghi)perylene
benzo(k)fluoranthene	chrysene	dibenz(a,h)anthracene
fluoranthene	fluorene	indeno(1,2,3-cd)pyrene
methylnaphthalene, 1-	methylnaphthalene, 2-	naphthalene
phenanthrene	pyrene	quinoline

Metals

aluminum	antimony	arsenic
barium	beryllium	boron
cadmium	chromium, hexavalent	chromium, trivalent
cobaH	copper	iron
lead	lithium	manganese
mercury	molybdenum	nickel
selenium	silver	strontium
thallium	tin	titanium
tungsten	vanadium	zinc

Polychlorinated biphenyls (PCBs)

arochlor 1016	arochlor 1221	arochlor 1232
arochlor 1242	arochlor 1248	arochlor 1254
arochlor 1260	arochlor 1262	arochlor 1268
decachlorobiphenyl	heptachlorobiphenyl, 2,3,3,4,4,5,5- (PCB 189)	hexachlorobiphenyl, 2,3,3,4,4,5- (PCB 156)
hexachlorobiphenyl, 2,3,3,4,4,5- (PCB 157)	hexachlorobiphenyl, 2,3,4,4,5,5- (PCB 167)	hexachlorobiphenyl, 3,3,4,4,5,5- (PCB 169)
PCB 080	PCB 118	pentachlorobiphenyl, 2,3,3,4,4- (PCB 105)
pentachlorobiphenyl, 2,3,4,4,5- (PCB 114)	pentachlorobiphenyl, 2,3,4,4,5- (PCB 123)	pentachlorobiphenyl, 3,3,4,4,5- (PCB 126)
tetrachlorobiphenyl, 3,3,4,4- (PCB 77)	tetrachlorobiphenyl, 3,4,4,5- (PCB 81)	

Solvents

carbon tetrachloride	chloroethane	chloroform
chloromethane	dichloroethane, 1,1-	dichloroethane, 1,2-
dichloroethylene, 1,1 -	dichloroethylene, 1,2- cisdichloroethylene,	1,2-transdichloromethane
tetrachloroethylene	tetrachloroethane, 1,1,1,2-	tetrachloroethane, 1,1,2,2-
trichloroethane, 1,1,1-	trichloroethane, 1,1,2-	trichloroethylene
vinyl chloride	chlorobenzene	dichlorobenzene, 1,3-
dichlorobenzene, 1,2-	dichlorobenzene, 1,4-	hexachlorobenzene
pentachlorobenzene, 1,2,3,4,5-	tetrachlorobenzene, 1,2,3,4-	tetrachlorobenzene, 1,2,3,5-
tetrachlorobenzene, 1,2,4,5-	trichlorobenzene, 1,2,3-	trichlorobenzene, 1,2,4-
trichlorobenzene, 1,3,5-	acetone	acetophenone
cyclohexanone	isophorone	2-hexanone (MBK)
methyl ethyl ketone (MEK)	methyl isobutyl ketone (MIBK)	

Glycols

ethylene glycol	propylene glycol
-----------------	------------------

Physical Parameters

total suspended solids (TSS)	pH
hardness	conductivity
biological oxygen demand (BOD)	

Toxicity

daphnia toxicity (96 hrs LC ₅₀)	trout toxicity (96 hrs LC ₅₀)
---	---



August 5, 2021
Amended: August 10, 2021
Amended: September 1, 2021
Amended: November 30, 2021
Amended: December 13, 2021

Order Number: 110800

Via email: skynoch@richmondsteel.ca and HDhillon@richmondsteel.ca

Richmond Steel Recycling Limited
11760 Mitchell Road
Richmond, BC V6V 1V8

Attention: Steven Kynoch, Regional SHECS Manager and Harbinder Dhillon, President

Pollution Prevention Order – Richmond Steel Recycling Ltd.

This Order is being issued under Section 81 of the *Environmental Management Act* (EMA), SBC 2003, C. 53. **This Order supersedes the versions issued on August 5, 2021, August 10, 2021, September 1, 2021 and November 13, 2021.** I am satisfied on reasonable grounds that an activity at Richmond Steel Recycling Ltd. (Richmond Steel) located at 11760 Mitchell Road, Richmond, British Columbia (the Site) is being performed by a person in a manner that is likely to release effluent that will cause pollution. Specifically, the Richmond Steel facility is located on the described land parcel:

Lot 8 Except Part Plan 49844 District Lot 459 Group 1 New Westminster
District Plan 47113

GROUND FOR ISSUANCE

I am satisfied that Richmond Steel is a person who:

- previously had or now has possession, charge or control of the substance;
- previously did anything, or who is now doing anything, which may cause the release of the substance; or
- previously owned or occupied, or now owns or occupies, the land on which the substance is located.

The substance likely to be released in a manner that will cause pollution is effluent from a facility classified in the *Waste Discharge Regulation* Schedule I as a “Commercial Waste Management and/or Waste Disposal Industry” and/or “Hazardous Waste Management” and in Schedule II as a “Vehicle Dismantling and Recycling Industry”.

As per their Environmental Management Plan (2021) (EM Plan), Richmond Steel, “a joint venture between Sims Metal Management and Nucor Corporation, has been operating since the early 1970s, [with] the primary onsite operations including metal recycling, wet vehicle handling and recycling, mobile car crushing, industrial bin services, building demolishing, and maritime salvage”. As per their Drainage & Mitigation Plan (2021) (D&M Plan), all stormwater on the site is directed to the bioswale area and ditch which flows directly into the Fraser River.

On December 12, 2019, Environment and Climate Change Canada (ECCC) enforcement staff “witnessed a pool of sediment-laden water with a grey sheen on its surface... directly adjacent to the Fraser River...” and “witnessed sediment-laden water with a grey sheen flowing from the aforementioned pool of water towards the Fraser River and discharging directly into the Fraser River from the foreshore of the property”. ECCC staff further “witnessed a grey sheen spreading across the surface of the Fraser River, originating at the flow of water discharging from foreshore of the property” (ECCC Warning Letter).

ECCC staff collected samples “from the aforementioned flow of water into the Fraser River and from a treatment ditch on the East side of the property”, flowing into the Fraser River. These samples were analysed at the ECCC, Pacific & Yukon Laboratory for Environmental Testing and ECCC shared the results with the Ministry of Environment and Climate Change Strategy (Ministry). The results showed levels of aluminum, copper, zinc, polychlorinated biphenyl (Arochlor-1242), naphthalene, benz(a)anthracenes, and pyrene to be above British Columbia Water Quality Guidelines (BCWQG), as listed in the summary table below (Table 1):

Table 1: Summary Table of ECCC samples collected on December 12, 2019. (Grey highlights indicate values either below BCWQG or between phototoxic and non-phototoxic). Source: 2020-01-28 V19L036_1 Detailed ECCC Results

Parameter	ECCC Results Bioswale	ECCC Results Shore/Dock	BCWQG
COD	506 mg/L	472 mg/L	
TSS	271 mg/L	2170 mg/L	
Aluminum (dissolved)	0.11 mg/L	0.12 mg/L	0.1 Acute mg/L 0.05 Chronic mg/L
Copper dissolved (mg/L)	0.45 mg/L (pH 7.3, Hardness 130, DOC 10*) *mid-range estimate for DOC	0.010 mg/L (pH 7.9, Hardness 150, DOC 10*) *mid-range estimate for DOC	0.0179 Acute mg/L 0.00298 Chronic mg/L 0.0348 Acute mg/L 0.00594 Chronic mg/L
Zinc, total (mg/L)	2.46 mg/L	14.6 mg/L	0.063 Acute mg/L 0.0375 Chronic mg/L
PCB, total (µg/L)	10.1 µg/L = 10100 ng/L	20.8 µg/L = 20800 ng/L	0.1 ng/L Acute (HWR = 0.005 mg/L = 5000ng/L)
Naphthalene (ug/L)	4.97 µg/L	0.52 µg/L	1 µg/L
Benz(a)anthracenes (ug/L)	0.44 µg/L	0.49 µg/L	0.1 µg/L Chronic
Fluoranthene	0.65 µg/L	1.12 µg/L	0.2 µg/L Phototoxic 4 µg/L Non-phototoxic
Pyrene	0.70 µg/L	1.14 µg/L	0.02 µg/L Chronic

In response to ECCC's findings, "*RSR retained Pottinger Gaherty Environmental Consultants Ltd. (PGL) to develop a Stormwater Management and Mitigation Plan (the Stormwater Plan) [that] included undertaking additional investigation of site conditions to help inform RSR's decisions as to the steps required to manage stormwater effectively*" (Update Letter, March 15, 2021).

In May 2021, Richmond Steel submitted updated D&M and EM Plans. Neither documents include sampling specifics or analytical results and neither documents propose an on-going sampling, monitoring, and reporting schedule (D&M Plan, 2021 and EM Plan, 2021).

On July 2, 2020, Ministry staff conducted an inspection of the Richmond Steel facility and assessed compliance with the *Hazardous Waste Regulation* (HWR), Section 17(1)(b), as not-determined because facility staff were unable to locate sample records. Richmond Steel staff later reported in a July 15, 2020, email that they "*did not find any reports or records of a storm water sampling program*". The inspection report concludes that "*there were no sample records*".

On April 26, 2021, Ministry staff again requested the sampling records to demonstrate compliance with HWR, Section 17(1)(b), and no records were provided. In direct response to the issue of HWR, Section 17(1)(b) records, Richmond Steel stated in a May 7, 2021, email – Compliance Advisory Table that "*Richmond Steel Recycling is not a Hazardous Waste Storage facility*" but do acknowledge in that same email that "*Sch. 1.2 does apply to the discharge*" (email, May 7, 2021).

On March 23, 2021, in an update letter to the City of Richmond, Mr. Keith Gagne, P.Eng, of PGL Environmental Consultants suggests that potential pollution is ubiquitous throughout the site and is on-going "*PCBs were non-detect (N.D.) in the soil samples; however, surface water throughout the Site exceeded BC Water Quality Guidelines. RSR was unable to isolate the PCB impacts to one area. It appears that the low levels of PCBs are likely related to ongoing activities, regardless of the controls RSR has or might reasonably put in place to prevent PCB materials from entering the Site.*"

Between September 1, 2021 and the date of this amendment and consistent with requirements of this Order, RSR has submitted multiple documents. These documents confirm activities and operations at the Site and identify various contaminants of potential concern and their ubiquitous presence on the Site and in the effluent.

Based on this information, I am satisfied on reasonable grounds that this activity/operation is being performed in a manner that is likely to release a substance that will cause pollution. Furthermore, I conclude that an amendment of this Order is required, as follows:

ORDER

Pursuant to Section 81 of the *Environmental Management Act* [SBC 2003] Chapter 53, Richmond Steel is hereby ordered to comply with the required actions listed in the table below and to provide information to the Director indicating the completion of each action.

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Daniel P. Bings
for Director, *Environmental Management Act*
Compliance Operations Manager

Attachments:
2021-11-07 Amended Order Appendices Nov 2021

cc:

Catherine Allard
Senior Authorizations Officer, South Coast Regional Office
Ministry of Forests, Lands & Natural Resources Operations and Rural Development
Suite 200 – 10428 153 Street, Surrey, BC V3R 1E1
Catherine.Allard@gov.bc.ca

Gregory Lee
Inspector and Fishery Officer, Environmental Enforcement Directorate
Enforcement Branch, Environment and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street, Vancouver, BC, V6C 3S5.
Gregory.lee3@canada.ca

Warren Mills
Environmental Coordinator
6911 No. 3 Road, Richmond, BC V6Y 2C1
wmills@richmond.ca

RE: 2021-12-13 Pollution Prevention Order Amendment 4 Corrected

From: Enick, Oana V ENV:EX
To: Karl Gustafson <Karl.Gustafson@mcmillan.ca>, Harbinder Dhillon <HDhillon@richmondsteel.ca>
Cc: Compliance Admin ENV:EX <Compliance.Admin@gov.bc.ca>, Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>, wmills@richmond.ca, Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>, Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>
Sent: December 13, 2021 3:27:50 PM PST
Attachments: image006.jpg, image005.jpg, image007.jpg, image009.jpg, image008.gif, 2021-11-07 Amended Order Appendices Nov 2021.pdf, image004.png, 2021-12-13 Amdt 4 PPO110800 Corrected.pdf

Hello:

Please see attached Corrected Version of PPO 110800 Amendment 4 which corrects a clerical error. Item 1 now reflects the correct table. There are no changes to the Amended Order Appendices Nov 2021 document.

Regards,

Please acknowledge receipt of this email by replying to this message by selecting "Reply All". Please write "received" in the email body as confirmation within 5 business days. In doing so, you are confirming that you are able to read its contents and open all attachments. If you are not able to open the attachments, please indicate this immediately as this may affect legislated time limits that prescribe your rights or obligations.



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

@ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

From: Karl Gustafson <Karl.Gustafson@mcmillan.ca>

Sent: December 13, 2021 12:42 PM

To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>; Harbinder Dhillon <HDhillon@richmondsteel.ca>

Cc: Compliance Admin ENV:EX <Compliance.Admin@gov.bc.ca>; Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>;
wmills@richmond.ca; Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>; Bings, Dan P ENV:EX
<Dan.Bings@gov.bc.ca>

Subject: RE: 2021-12-13 Pollution Prevention Order Amendment

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Received.

mcmillan

Karl E Gustafson, Q.C.

Counsel
d 604.691.7427
karl.gustafson@mcmillan.ca

Assistant: Karen Lam | 236.826.3051 | karen.lam@mcmillan.ca

Please consider the environment before printing this e-mail.

From: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: Monday, December 13, 2021 12:30 PM
To: Harbinder Dhillon <HDhillon@richmondsteel.ca>; Karl Gustafson <Karl.Gustafson@mcmillan.ca>
Cc: Compliance Admin ENV:EX <Compliance.Admin@gov.bc.ca>; Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>;
wmills@richmond.ca; Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>; Bings, Dan P ENV:EX
<Dan.Bings@gov.bc.ca>
Subject: 2021-12-13 Pollution Prevention Order Amendment

EXTERNAL EMAIL Exercise caution before opening links or attachments. **COURRIEL DE L'EXTERNE** Faites preuve de prudence avant de cliquer sur des liens ou des pièces jointes.

Hello:

In response to RSR's latest concern regarding sampling parameters, the Director amended Pollution Prevention Order to refer to sampling parameters in Item 1, for which there are Approved or Working Water Quality Guidelines. Please see the attached amended Pollution Prevention Order 110800 and the amended order appendices (no changes were made to the Appendices).

Please acknowledge receipt of this email by replying to this message by selecting "Reply All". Please write "received" in the email body as confirmation within 5 business days. In doing so, you are confirming that you are able to read its contents and open all attachments. If you are not able to open the attachments, please indicate this immediately as this may affect legislated time limits that prescribe your rights or obligations.

Regards,



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

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August 5, 2021

Amended: August 10, 2021

Amended: September 1, 2021

Amended: November 30, 2021

Amended: December 13, 2021 and December 13, 2021 Corrected

Order Number: 110800

Via email: skynoch@richmondsteel.ca and HDhillon@richmondsteel.ca

Richmond Steel Recycling Limited

11760 Mitchell Road

Richmond, BC V6V 1V8

Attention: Steven Kynoch, Regional SHECS Manager and Harbinder Dhillon, President

Pollution Prevention Order – Richmond Steel Recycling Ltd.

This Order is being issued under Section 81 of the *Environmental Management Act* (EMA), SBC 2003, C. 53. **This Order supersedes the versions issued on August 5, 2021, August 10, 2021, September 1, 2021, November 30, 2021 and the uncorrected version issued on December 13, 2021.** I am satisfied on reasonable grounds that an activity at Richmond Steel Recycling Ltd. (Richmond Steel) located at 11760 Mitchell Road, Richmond, British Columbia (the Site) is being performed by a person in a manner that is likely to release effluent that will cause pollution. Specifically, the Richmond Steel facility is located on the described land parcel:

Lot 8 Except Part Plan 49844 District Lot 459 Group 1 New Westminster
District Plan 47113

GROUND FOR ISSUANCE

I am satisfied that Richmond Steel is a person who:

- previously had or now has possession, charge or control of the substance;
- previously did anything, or who is now doing anything, which may cause the release of the substance; or
- previously owned or occupied, or now owns or occupies, the land on which the substance is located.

The substance likely to be released in a manner that will cause pollution is effluent from a facility classified in the *Waste Discharge Regulation* Schedule I as a “Commercial Waste Management and/or Waste Disposal Industry” and/or “Hazardous Waste Management” and in Schedule II as a “Vehicle Dismantling and Recycling Industry”.

As per their Environmental Management Plan (2021) (EM Plan), Richmond Steel, “a joint venture between Sims Metal Management and Nucor Corporation, has been operating since the early 1970s, [with] the primary onsite operations including metal recycling, wet vehicle handling and recycling, mobile car crushing, industrial bin services, building demolishing, and maritime salvage”. As per their Drainage & Mitigation Plan (2021) (D&M Plan), all stormwater on the site is directed to the bioswale area and ditch which flows directly into the Fraser River.

On December 12, 2019, Environment and Climate Change Canada (ECCC) enforcement staff “witnessed a pool of sediment-laden water with a grey sheen on its surface... directly adjacent to the Fraser River...” and “witnessed sediment-laden water with a grey sheen flowing from the aforementioned pool of water towards the Fraser River and discharging directly into the Fraser River from the foreshore of the property”. ECCC staff further “witnessed a grey sheen spreading across the surface of the Fraser River, originating at the flow of water discharging from foreshore of the property” (ECCC Warning Letter).

ECCC staff collected samples “from the aforementioned flow of water into the Fraser River and from a treatment ditch on the East side of the property”, flowing into the Fraser River. These samples were analysed at the ECCC, Pacific & Yukon Laboratory for Environmental Testing and ECCC shared the results with the Ministry of Environment and Climate Change Strategy (Ministry). The results showed levels of aluminum, copper, zinc, polychlorinated biphenyl (Arochlor-1242), naphthalene, benz(a)anthracenes, and pyrene to be above British Columbia Water Quality Guidelines (BCWQG), as listed in the summary table below (Table 1):

Table 1: Summary Table of ECCC samples collected on December 12, 2019. (Grey highlights indicate values either below BCWQG or between phototoxic and non-phototoxic). Source: 2020-01-28 V19L036_1 Detailed ECCC Results

Parameter	ECCC Results Bioswale	ECCC Results Shore/Dock	BCWQG
COD	506 mg/L	472 mg/L	
TSS	271 mg/L	2170 mg/L	
Aluminum (dissolved)	0.11 mg/L	0.12 mg/L	0.1 Acute mg/L 0.05 Chronic mg/L
Copper dissolved (mg/L)	0.45 mg/L (pH 7.3, Hardness 130, DOC 10*) *mid-range estimate for DOC	0.010 mg/L (pH 7.9, Hardness 150, DOC 10*) *mid-range estimate for DOC	0.0179 Acute mg/L 0.00298 Chronic mg/L 0.0348 Acute mg/L 0.00594 Chronic mg/L
Zinc, total (mg/L)	2.46 mg/L	14.6 mg/L	0.063 Acute mg/L 0.0375 Chronic mg/L
PCB, total (µg/L)	10.1 µg/L = 10100 ng/L	20.8 µg/L = 20800 ng/L	0.1 ng/L Acute (HWR = 0.005 mg/L = 5000ng/L)
Naphthalene (ug/L)	4.97 µg/L	0.52 µg/L	1 µg/L
Benz(a)anthracenes (ug/L)	0.44 µg/L	0.49 µg/L	0.1 µg/L Chronic
Fluoranthene	0.65 µg/L	1.12 µg/L	0.2 µg/L Phototoxic 4 µg/L Non-phototoxic
Pyrene	0.70 µg/L	1.14 µg/L	0.02 µg/L Chronic

In response to ECCC's findings, "*RSR retained Pottinger Gaherty Environmental Consultants Ltd. (PGL) to develop a Stormwater Management and Mitigation Plan (the Stormwater Plan) [that] included undertaking additional investigation of site conditions to help inform RSR's decisions as to the steps required to manage stormwater effectively*" (Update Letter, March 15, 2021).

In May 2021, Richmond Steel submitted updated D&M and EM Plans. Neither documents include sampling specifics or analytical results and neither documents propose an on-going sampling, monitoring, and reporting schedule (D&M Plan, 2021 and EM Plan, 2021).

On July 2, 2020, Ministry staff conducted an inspection of the Richmond Steel facility and assessed compliance with the *Hazardous Waste Regulation* (HWR), Section 17(1)(b), as not-determined because facility staff were unable to locate sample records. Richmond Steel staff later reported in a July 15, 2020, email that they "*did not find any reports or records of a storm water sampling program*". The inspection report concludes that "*there were no sample records*".

On April 26, 2021, Ministry staff again requested the sampling records to demonstrate compliance with HWR, Section 17(1)(b), and no records were provided. In direct response to the issue of HWR, Section 17(1)(b) records, Richmond Steel stated in a May 7, 2021, email – Compliance Advisory Table that "*Richmond Steel Recycling is not a Hazardous Waste Storage facility*" but do acknowledge in that same email that "*Sch. 1.2 does apply to the discharge*" (email, May 7, 2021).

On March 23, 2021, in an update letter to the City of Richmond, Mr. Keith Gagne, P.Eng, of PGL Environmental Consultants suggests that potential pollution is ubiquitous throughout the site and is on-going "*PCBs were non-detect (N.D.) in the soil samples; however, surface water throughout the Site exceeded BC Water Quality Guidelines. RSR was unable to isolate the PCB impacts to one area. It appears that the low levels of PCBs are likely related to ongoing activities, regardless of the controls RSR has or might reasonably put in place to prevent PCB materials from entering the Site.*"

Between September 1, 2021 and the date of this amendment and consistent with requirements of this Order, RSR has submitted multiple documents. These documents confirm activities and operations at the Site and identify various contaminants of potential concern and their ubiquitous presence on the Site and in the effluent.

Based on this information, I am satisfied on reasonable grounds that this activity/operation is being performed in a manner that is likely to release a substance that will cause pollution. Furthermore, I conclude that an amendment of this Order is required, as follows:

ORDER

Pursuant to Section 81 of the *Environmental Management Act* [SBC 2003] Chapter 53, Richmond Steel is hereby ordered to comply with the required actions listed in the table below and to provide information to the Director indicating the completion of each action.

Item	Required Action	Required by midnight on:						
1.	<p>Implement an effluent monitoring programme which includes the following:</p> <table border="1" data-bbox="295 477 1190 835"> <thead> <tr> <th data-bbox="295 477 608 539">Sampling Locations*</th><th data-bbox="608 477 906 539">Summary Sampling Parameters**</th><th data-bbox="906 477 1190 539">Sampling Frequency</th></tr> </thead> <tbody> <tr> <td data-bbox="295 539 608 835"> <ul style="list-style-type: none"> Ditch Ditch/River </td><td data-bbox="608 539 906 835"> <ul style="list-style-type: none"> Petroleum hydrocarbons Polycyclic aromatic hydrocarbons Total and Dissolved Metals Solvents and Glycols Total Suspended Solids PH, Hardness & Conductivity Biological Oxygen Demand Chemical Oxygen Demand Toxicity 96 hr trout LC₅₀*** Toxicity 96 hr Daphnia LC₅₀ </td><td data-bbox="906 539 1190 835"> <ul style="list-style-type: none"> Monthly, starting no later than November 26, 2021. and During or Immediately after significant rain events*** </td></tr> </tbody> </table> <p>* Sampling Locations as identified on RSR WCPv3, October 2021 Figure 2 and attached as Order Appendix A.</p> <p>** Sampling Parameters as detailed in RSR WCPv3, October 2021 Appendix 1 – Expanded List of PCOCs and attached as Order Appendix B and for which there are Approved or Working BC Water Quality Guidelines.</p> <p>***Immediately following significant rain events: -significant rain event is defined as a period of precipitation which meets or exceeds the intensity of 25 mm in 24 hrs as reported by Environment Canada at Vancouver Intl A station and -during or immediately following means within 12 hours of EC recording precipitation equal to or in excess of 25 mm in 24 hrs. (NOTE: EC's rainfall data can be determined on a daily or hourly basis, as needed).</p>	Sampling Locations*	Summary Sampling Parameters**	Sampling Frequency	<ul style="list-style-type: none"> Ditch Ditch/River 	<ul style="list-style-type: none"> Petroleum hydrocarbons Polycyclic aromatic hydrocarbons Total and Dissolved Metals Solvents and Glycols Total Suspended Solids PH, Hardness & Conductivity Biological Oxygen Demand Chemical Oxygen Demand Toxicity 96 hr trout LC₅₀*** Toxicity 96 hr Daphnia LC₅₀ 	<ul style="list-style-type: none"> Monthly, starting no later than November 26, 2021. and During or Immediately after significant rain events*** 	December 10, 2021
Sampling Locations*	Summary Sampling Parameters**	Sampling Frequency						
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2.	<p>Monthly reporting:</p> <p>By the 10th of each month, Richmond Steel must provide an update of activities from the month previous. These monthly updates must include:</p> <ol style="list-style-type: none"> certification from the Qualified Professional regarding testing protocols, interpretation, and update information, a summary of activities completed towards complying with requirement 1 of the order, analytical results for Item 1, interpretation of the results, including comparison to standards in the British Columbia Water Quality Guidelines and the Hazardous Waste Regulation, and rationale for conclusions reached, pertinent photographs, drawings, maps and other documentation, and summary of daily precipitation as recorded at Vancouver Intl A station, demonstrating maximum precipitations within a 24 hour period. <p>This requirement will remain in place until this Order is cancelled by the Director.</p>	On the 10 th day of every month starting on September 10, 2021.						

Item	Required Action	Required by midnight on:
3.	The qualified professional(s) performing any of the following in response to this order: performing work, authoring reports, and/or providing opinions must complete and submit the attached Declaration of Competency and Conflict of Interest Disclosure Statement forms.	First QP submission of past, current or future work

For the purposes of this Order, the following definition applies:

"Qualified Professional" means an applied scientist or technologist specializing in a particular applied science or technology, including agrology, biology, chemistry, engineering, geology or hydrogeology, who (a) is registered in British Columbia with the professional organization responsible for his or her area of expertise, acting under that professional association's code of ethics and subject to disciplinary action by that association, and (b) through suitable education, experience, accreditation and knowledge, may be reasonably relied on to provide advice within his or her area of expertise as it relates to this order, or (c) is approved by the Director.

DUTY TO COMPLY

The requirements above must be completed on or before the associated "Required By" date. Failure to comply with the requirements of this order is a contravention of the *Environmental Management Act* [SBC 2003, c.53] and may result in legal action. I direct your attention to Section 120(10) of the *Environmental Management Act*, which reads:

"(10) A person who contravenes an order...that is given, made or imposed under this Act by a ...director...commits an offence and is liable on conviction to a fine not exceeding \$300 000 or imprisonment for not more than 6 months, or both."

Failure to comply with the requirements of this order may also result in an administrative penalty under the Administrative Penalties Regulation (*Environmental Management Act*) [B.C. Reg 133/2014] (Regulation). I direct your attention to Section 12(4) of the Regulation, which reads:

"(4) A person who fails to comply with an order under the [Environmental Management] Act is liable to an administrative penalty not exceeding \$40,000."

RIGHT TO APPEAL

This decision may be appealed to the Environmental Appeal Board in accordance with Part 8 of the *Environmental Management Act*. An appeal must be delivered within 30 days from the date notice of this order is given. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

NOTIFICATION OF PUBLICATION

The Party is notified that the Province intends to publish on the Ministry of Environment website the entirety of any Regulatory Document provided that:

- a) The Province will provide written notice to the party of its intent to publish the Regulatory Documents at least [14] days prior to publication;
- b) The Province will not publish any information what could not, if it were subject to a request under section 5 FOIPPA, be disclosed under the Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. 165 as amended from time to time.

This order will also appear in the Ministry of Environment's Quarterly Environmental Enforcement Summary and Environmental Violations Database.

MINISTRY CONTACT

If you have any questions, please contact the undersigned at Dan.Bings@gov.bc.ca or Environmental Protection Officer Oana Enick at 236-468-2231 and Oana.Enick@gov.bc.ca.

Regards,



Daniel P. Bings
for Director, *Environmental Management Act*
Compliance Operations Manager

Attachments:
2021-11-07 Amended Order Appendices Nov 2021

cc:

Catherine Allard
Senior Authorizations Officer, South Coast Regional Office
Ministry of Forests, Lands & Natural Resources Operations and Rural Development
Suite 200 – 10428 153 Street, Surrey, BC V3R 1E1
Catherine.Allard@gov.bc.ca

Gregory Lee
Inspector and Fishery Officer, Environmental Enforcement Directorate
Enforcement Branch, Environment and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street, Vancouver, BC, V6C 3S5.
Gregory.lee3@canada.ca

Warren Mills
Environmental Coordinator
6911 No. 3 Road, Richmond, BC V6Y 2C1
wmills@richmond.ca

Requested documents

From: Steven Kynoch <SKynoch@richmondsteel.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>, Gregory.lee3@canada.ca
Sent: January 14, 2022 8:54:47 AM PST
Attachments: 2021-12-09_DFO_RESPONSE.pdf, BC HW Movement Manifest - Jan 2022.pdf, image001.png, BC HW Movement Manifest - Nov - Dec 2021.pdf

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Hello,
Please find the documents you requested attached.

Regards

Steven Kynoch

EHS Regional Manager

skynoch@richmondsteel.ca

Mobile. 604-833-9750 | Office. 604-394-2039

11760 Mitchell Rd, Richmond, BC, V6V 1V8

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Fisheries and Oceans
Canada

Pacific Region
Ecosystem Management Branch
200 – 401 Burrard Street
Vancouver, BC
V6C 3S4

Pêches et Océans
Canada

Région du Pacifique
Direction de la gestion des écosystèmes
Pièce 200 – 401 rue Burrard
Vancouver (C.-B.)
V6C 3S4

December 9, 2021

Your file *Votre référence*

Our file *Notre référence*
21-HPAC-01015

Richmond Steel Recycling
Attention: Karl Gustafson
Q.C., Counsel
1500-1055 West Georgia St.
Vancouver, BC V6E 4N7

Via email: Karl.Gustafson@mcmillan.ca

Dear Karl Gustafson:

Subject: Ditch Remediation, Fraser River, Richmond – Implementation of Measures to Avoid and Mitigate the Potential for Prohibited Effects to Fish and Fish Habitat

The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received your proposal on September 1, 2021. We understand that you propose to:

- Excavate and remove contaminated sediment that has accumulated within an onsite ditch;
- Construct a detention pond and new water treatment system; and
- Construct a new bioswale including restoration planting (approximately 700 m² aquatic footprint below the high water mark and 150 m² riparian footprint).

Our review considered the following information:

- Request for Review form received by email on September 1, 2021, signed by Ashleigh Gilbert of PGL Environmental Consultants, including fish protection measures and design drawings; and
- Environmental Impact Assessment prepared by PGL Environmental Consultants, dated August 30, 2021.

Your proposal has been reviewed to determine whether it is likely to result in:

- the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat which are prohibited under subsections 34.4(1) and 35(1) of the *Fisheries Act*; and
- effects to listed aquatic species at risk, any part of their critical habitat or the residences of their individuals in a manner which is prohibited under sections 32, 33 and subsection 58(1) of the *Species at Risk Act*.

Canada

1/3

The aforementioned outcomes are prohibited unless authorized under their respective legislation and regulations.

To avoid and mitigate the potential for the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat, it is important that all proposed measures are implemented as set out in the information that was submitted to the Program in relation to your project. In addition, we recommend implementing the measures listed below to avoid and mitigate the potential for the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat. If there is a conflict between the proposed measures as set out in the information that was submitted to the Program and the following measures, the following measures shall prevail.

- The removal of or disturbance to riparian vegetation should be kept to a minimum during the works.
- Works to be conducted during the least risk to fish instream work window of June 16 to February 28 and, if possible, when the watercourse is dry.
- If works cannot be conducted in the dry, work should be conducted in the isolation of flow in accordance with applicable measures in DFO's interim code of practice for temporary cofferdams and diversion channels (<http://www.dfo-mpo.gc.ca/pnw-ppe/codes/cofferdams-batardeaux-eng.html>).
- Complete the works as quickly as possible once they are started.
- Undertake works during dry weather and low water conditions.
- Equipment is to be situated in the dry stream channel within the footprint of the works or operated from the top of the bank.
- For works in fish bearing waters, fish passage is to be maintained upon completion of the works.
- Ensure that material such as rock, riprap, or other materials placed on the banks or within the active channel or floodplain of the watercourse is inert and free of silt, overburden, debris, or other substances deleterious to aquatic life.
- Minimize the introduction of sediments (e.g., silts, clays and sand) into the watercourse or downstream reaches of the watercourse.
- Develop and implement an erosion and sediment control plan to avoid and minimize the introduction of sediment into or induced sedimentation in the watercourse.
- Do not deposit any substances deleterious to fish or fish habitat directly or indirectly into the watercourse or downstream reaches of the watercourse.
- Develop and implement a response plan to avoid a spill of deleterious substances into the watercourse.
- Works should be monitored full-time during start-up and any instream works or sensitive activity. The environmental monitor must be an appropriately qualified professional and ensure mitigation measures are implemented for the protection of fish and fish habitat.

Provided that you incorporate these measures into your plans, the Program is of the view that your proposal is not likely to result in the contravention of the above mentioned prohibitions and requirements.

Should your plans change or if you have omitted some information in your proposal, further review by the Program may be required. Consult our website (<http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html>) or consult with a qualified environmental consultant to determine if further review may be necessary. It remains your responsibility to remain in compliance with the *Fisheries Act*, the *Species at Risk Act* and the *Aquatic Invasive Species Regulations*.

It is also your Duty to Notify DFO if you have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat. Such notifications should be directed to the DFO-Pacific Observe, Record and Report phone line at 1-800-465-4336 or by email at DFO.ORR-ONS.MPO@dfo-mpo.gc.ca.

We recommend that you notify this office at least 10 days before starting your project and that a copy of this letter be kept on site while the work is in progress. It remains your responsibility to meet all other federal, territorial, provincial and municipal requirements that apply to your proposal.

Please note that this Letter of Advice does not provide relief from the obligations set out in the government of British Columbia's Riparian Areas Protection Regulations (RAPR), and cannot be construed to provide authorization pursuant to section 3(2) of the RAPR, for any work, undertaking or activity within the Riparian Assessment Area. For more information on the RAPR, including contacts, please visit: <https://www2.gov.bc.ca/gov/content/environment/plants-animals-ecosystems/fish/aquatic-habitat-management/riparian-areas-regulation>.

Please note that the advice provided in this letter will remain valid for a period of 1 year from the date of issuance. If you plan to execute your proposal after the expiry of this letter, we recommend that you contact the Program to ensure that the advice remains up-to-date and accurate. Furthermore, the validity of the advice is also subject to there being no change in the relevant aquatic environment, including any legal protection orders or designations, during the 1 year period.

If you have any questions with the content of this letter, please contact Ian Matchett at our Vancouver office at 236-334-9307 or by email at Ian.Matchett@dfo-mpo.gc.ca. Please refer to the file number referenced above when corresponding with the Program.

Sincerely,



Duncan Lanoville
A/Senior Biologist
Fish and Fish Habitat Protection Program

c.c.: Ashleigh Gilbert, PGL Environmental Consultants, AGilbert@pggroup.com

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

BC145187-3

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				B Carrier Transporteur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				C Receiver / consignee Réceptionnaire / destinataire Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial			
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING				Company name / Nom de l'entreprise SUMAS ENVIRONMENTAL SERVICES				Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous			
Mailing address / Adresse postale 11760 MITCHELL RD, RICHMOND BC V6V 1V8				Mailing address / Adresse postale 4623 BYRNE RD BURNABY BC V5J 3N6				City / Ville RICHMOND BC			
E-mail / Courriel électronique skvach@richmondsteel.ca				E-mail / Courriel électronique 6041826178				City / Ville RICHMOND BC			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD				Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon				Registration No. / N° d'immatriculation M40288 BC			
Intended Receiver / consignee Réceptionnaire / destinataire prévu SUMAS ENVIRONMENTAL				Port of entry Point d'entrée				Port of exit Point de sortie			
Mailing address / Adresse postale 4623 BYRNE RD BURNABY BC V5J 3N6				Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.				Name of authorized person (print): Nom de l'agent autorisé (caractères d'imprimerie):			
E-mail / Courriel électronique ()				Year / Année 2017				Signature: [Signature]			
Receiving site address / Adresse du lieu de destination 4623 BYRNE RD				Year / Année 2017				Date received / Date de réception Year / Année 2017			
City / Ville BURNABY BC				Month / Mois 01				Day / Jour 17			
City / Ville BURNABY BC				Year / Année 2017				Time / Heure 6:00 AM			
If waste or recyclable material to be transferred, specify intended company name / Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire				Registration No. / Provincial ID No. N° d'immatriculation/d'id provincial				Quantity received Quantité reçue			
Quantity received Quantité reçue				Units L or / ou Kg				Comments Commentaires			
Handling Code de manutention				Shipment / Envoi Accepted / Refused				Decont. Veh.			
If handling code "Other" (specify) Si code de manutention « autre » (spécifier)				Receiver / consignee certification: I certify that the information contained in Part C is correct and complete. Attestation du réceptionnaire / destinataire: J'atteste que tous les renseignements à la partie C sont exacts et complets.				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie)			
Signature				Tel. No. / N° de tél. ()				Special handling / Manutention spéciale <input type="checkbox"/> Attached / Ci-joint <input type="checkbox"/> As follows / Ci-contre:			

Generator / consigneur certification: I certify that the information contained in Part A is correct and complete, I hereby declare that contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, labeled and placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.
Attestation du producteur / expéditeur: J'atteste que tous les renseignements à la partie A sont exacts et complets. Je déclare que le contenu de ce chargement est décrit ci-dessus de façon complète et exacte par la désignation officielle de transport et qu'il est correctement classé, emballé, marqué, étiqueté, muni de plaques-étiquettes et à tous égards bien conditionné pour être transporté conformément aux réglementations internationales et nationales applicables.

Name of authorized person (print)
 Nom de l'agent autorisé (caractères d'imprimerie)
 [Signature]
 Signature

Tel. No. / N° de tél.
 (604) 326 3271

Date shipped / Date d'expédition
 Year / Année
 2017
 Month / Mois
 01
 Day / Jour
 17
 Time / Heure
 6:00 AM
 Scheduled arrival date / Date d'arrivée prévue
 Year / Année
 2017
 Month / Mois
 01
 Day / Jour
 17

Retained by Consignor

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

BC145188-1

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur				B Carrier Transporteur				C Receiver / consignee Réceptionnaire / destinataire			
Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				Reference Nos. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés			
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING				Company name / Nom de l'entreprise SUMAS Environnemental Service				Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous			
Mailing address / Adresse postale City / Ville Province Postal code / Code postal 11760 MITCHELL RD RICHMOND BC V6V 1V8				Mailing address / Adresse postale City / Ville Province Postal code / Code postal 4623 BURNIE RD BURNABY BC				Company name / Nom de l'entreprise			
E-mail / Courriel électronique Tel. No. / N° de tél. Skirch@richmondsteel.ca ()				E-mail / Courriel électronique Tel. No. / N° de tél. 604-623-6678 ()				Mailing address / Adresse postale			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD RICHMOND BC V6V 1V8				Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon Trailer - Rail car No. 2 2 ^e remorque - wagon				Registration No. / N° d'immatriculation Prov. 24 1540 BC			
Intended Receiver / consignee Réceptionnaire / destinataire prévu				Port of entry Point d'entrée International use only				Port of exit Point de sortie International use only			
Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.				Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial			
Mailing address / Adresse postale City / Ville Province Postal code / Code postal 4623 BURNIE RD BURNABY BC V5J 1H6				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie): LUCY DAUER				Tel. No. / N° de tél. ()			
E-mail / Courriel électronique Tel. No. / N° de tél. ()				Year / Année Month / Mois Day / Jour 212 01 11				Signature			
Receiving site address / Adresse du lieu de destination 4623 BURNIE RD BURNABY BC V5J 1H6				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie): LUCY DAUER				Tel. No. / N° de tél. ()			
City / Ville Province Postal code / Code postal BURNABY BC V5J 1H6				Year / Année Month / Mois Day / Jour 212 01 11				Signature			
Prov. code Code prov. 3				Shipping name Appellation réglementaire 4				Class / Classe Sub. class(es) Classe(s) sub. 5			
(i) N/A WASTE OIL				(i) N/A N/A N/A 583 L 01 03 L				Quantity shipped Quantité expédiée 6			
(ii)				(ii)				Units L or / ou Kg Unités 8			
(iii)				(iii)				Packaging/Contentant No. / N° Codes Int-ext 9			
(iv)				(iv)				Phys. state Etat phys. 10			
Notice No. N° de notification 11				Notice Line No N° de ligne de la notification 12				Shipment Envoi 13			
(i)				(i)				National code in country of / Code du pays 18			
(ii)				(ii)				Customs code(s) Code(s) de douanes 19			
(iii)				(iii)				If handling code "Other" (specify) Si code de manutention « autre » (spécifier)			
(iv)				(iv)				Receiver / consignee certification: I certify that the information contained in Part C is correct and complete. Attestation du réceptionnaire / destinataire: J'atteste que tous les renseignements à la partie C sont exacts et complets.			
Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie): Jennifer Singer				Tel. No. / N° de tél. 604-326-3275				Signature			
Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour 212 01 11				Time / Heure A.M. P.M. 11:00				Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour 212 01 11			
Special handling / Manutention spéciale <input type="checkbox"/> Attached / Ci-joint <input type="checkbox"/> As follows / Ci-contre: No placard required				Retained by Consignor Gardée par l'expéditeur				Page 224 of 282 MOE-2022-21491 Copy / Copie 2 (green / verte)			

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

BC145175-8

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur		B Carrier Transporteur		C Receiver / consignee Réceptionnaire / destinataire	
Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		Reference Nos. of other movement document(s) / manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés	
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING		Company name / Nom de l'entreprise SSC VENTURES LTD		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A	
Mailing address / Adresse postale City / Ville Province Postal code / Code postal		Mailing address / Adresse postale City / Ville Province Postal code / Code postal		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A	
E-mail / Courriel électronique Tel. No. / N° de tél.		E-mail / Courriel électronique Tel. No. / N° de tél.		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A	
Shipping site address / Adresse du lieu de l'expédition City / Ville Province Postal code / Code postal		Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon Registration No. / N° d'immatriculation 15403C Prov. 24 BC		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A	
Intended Receiver / consignee Réceptionnaire / destinataire prévu		Port of entry Point d'entrée		Port of exit Point de sortie	
Mailing address / Adresse postale City / Ville Province Postal code / Code postal		Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.		Date received / Date de réception Year / Année Month / Mois Day / Jour	
E-mail / Courriel électronique Tel. No. / N° de tél.		Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie):		Time / Heure AM PM	
Receiving site address / Adresse du lieu de destination City / Ville Province Postal code / Code postal		Signature:		If waste or recyclable material to be transferred, specify intended company name / Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire	
Prov. code Code prov.		Shipping name Appellation réglementaire		Registration No. / Provincial ID No. N° d'immatriculation/d'id provincial	
Class / Classe Sub. class(es) Classe(s) sub.		UN No. N° NU		Packing / risk gr. Gr. d'emballage/ de risque	
Quantity shipped Quantité expédiée		Units L or / ou Kg Unités		Packaging/Contenant No. / N° Codes Int-ext.	
Phys. state État phys.		Quantity received Quantité reçue		Comments Commentaires	
Handling Code / Code de manutention		Shipment / Envoi Accepted Refused		Decort. Pack. Veh. Cont. Véh.	
Notice No N° de notification		Notice Line No N° de ligne de la notification		If handling code "Other" (specify) Si code de manutention « autre » (spécifier)	
Shipment Envoi		Of / De		Receiver / consignee certification: I certify that the information contained in Part C is correct and complete. / Attestation du réceptionnaire / destinataire: J'atteste que tous les renseignements à la partie C sont exacts et complets.	
D or R code Code D ou R		C code Code C		Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie)	
Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE		H code Code H		Y code Code Y	
National code in country of / Code du pays		Export Exportation		Import Importation	
Customs code(s) Code(s) de douanes		Signature		Tel. No. / N° de tél.	
International use only					
Special handling / Manutention spéciale Attached / Ci-joint: As follows / Ci-contre:					
Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour					
Time / Heure AM PM					
Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour					

Retained by Consignor

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

BC147173-1

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur		B Carrier Transporteur		C Receiver / consignee Réceptionnaire / destinataire	
Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		Reference Nos. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés	
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING LTD		Company name / Nom de l'entreprise SUMAS Environmental Service		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous	
Mailing address / Adresse postale City / Ville Province Postal code / Code postal 11760 WITCHELL ROAD RICHMOND BC		Mailing address / Adresse postale City / Ville Province Postal code / Code postal 423 Brome Rd Burnaby BC V5J 3H6		Company name / Nom de l'entreprise Mailing address / Adresse postale City / Ville Province Postal code / Code postal E-mail / Courriel électronique Receiving site address / Adresse du lieu de destination	
E-mail / Courriel électronique Tel. No. / N° de tél. 604-786-4397		E-mail / Courriel électronique Tel. No. / N° de tél. 604-622-6678		Date received / Date de réception Year / Année Month / Mois Day / Jour Time / Heure <input type="checkbox"/> A.M. <input type="checkbox"/> P.M.	
Shipping site address / Adresse du lieu de l'expédition City / Ville Province Postal code / Code postal 11760 WITCHELL ROAD RICHMOND BC		Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon Trailer - Rail car No. 2 2 ^e remorque - wagon Registration No. / N° d'immatriculation FD6919 BC		If waste or recyclable material to be transferred, specify intended company name / Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire Registration No. / Provincial ID No. N° d'immatriculation/d'id provincial	
Intended Receiver / consignee Réceptionnaire / destinataire prévu SUMAS Environmental Service Mailing address / Adresse postale City / Ville Province Postal code / Code postal 423 Brome Rd Burnaby BC V5J 3H6 E-mail / Courriel électronique Tel. No. / N° de tél. 604-622-6678		Port of entry Point d'entrée International use only Port of exit Point de sortie International use only Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.		Name of authorized person (print): Nom de l'agent autorisé (caractères d'imprimerie): Year / Année Month / Mois Day / Jour Signature:	
Receiving site address / Adresse du lieu de destination City / Ville Province Postal code / Code postal Same as Above BC		Name of authorized person (print): Nom de l'agent autorisé (caractères d'imprimerie): Year / Année Month / Mois Day / Jour Signature:		Quantity received Quantité reçue Units L or / ou kg Commentaires Handling Code / Code de manutention Shipment / Envoi Accepted / Refused Decont. Pack. Cont. Veh.	
Prov. code Code prov.		Shipping name Appellation réglementaire		Class / Classe Sub. class(es) Classe(s) sub.	
UN No. N° NU		Packing / risk gr. Gr. d'emballage / de risque		Quantity shipped Quantité expédiée	
Units L or / ou kg Unités		Packaging/Contentant Codes Int - ext		Phys. state État phys.	
Notice No. N° de notification		Notice Line No. N° de ligne de la notification		Shipment Envoi	
Of / De		D or R code Code D ou R		C code Code C	
Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE		H code Code H		Y code Code Y	
National code in country of / Code du pays		Export Exportation		Import Importation	
Customs code(s) Code(s) de douanes		If handling code "Other" (specify) Si code de manutention « autre » (spécifier)		Receiver / consignee certification: I certify that the information contained in Part C is correct and complete. Attestation du réceptionnaire / destinataire: J'atteste que tous les renseignements à la partie C sont exacts et complets.	
Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie)		Tel. No. / N° de tél.		Signature	
Special handling / Manutention spéciale <input type="checkbox"/> Attached / Ci-joint <input type="checkbox"/> As follows / Ci-contre:		Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour		Time / Heure <input type="checkbox"/> A.M. <input type="checkbox"/> P.M.	
Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour		Retained by Consignor Gardé par l'expéditeur		Page 226 of 282 MOE 2022 21491	

A Generator / consigneur Producteur / expéditeur		B Carrier Transporteur		C Receiver / consignee Réceptionnaire / destinataire	
Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial	
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING		Company name / Nom de l'entreprise SUMAS ENVIRONMENTAL SERVICE		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A	
Mailing address / Adresse postale 11760 MITCHELL RD RICHMOND BC V6V 1V8		Mailing address / Adresse postale 4123 BYRNE RD BURNABY BC V5J 3H6		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A	
E-mail / Courriel électronique SKYNOCH@RICHMONDSTEEL.CA		E-mail / Courriel électronique 645-452-678		Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous <input type="checkbox"/>	
Receiving site address / Adresse du lieu de l'expédition 11760 MITCHELL RD RICHMOND BC V6V 1V8		Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon		Registration No. / N° d'immatriculation M 110288	
Province BC		Province BC		Prov. BC	
Postal code / Code postal V6V 1V8		Postal code / Code postal V5J 3H6		Postal code / Code postal V5J 3H6	
Intended Receiver / consignee Réceptionnaire / destinataire prévu		Port of entry Point d'entrée		Port of exit Point de sortie	
Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.		Name of authorized person (print): Nom de l'agent autorisé (caractères d'imprimerie):	
Mailing address / Adresse postale 4123 BYRNE RD BURNABY BC V5J 3H6		Signature: 21111111		Tel. No. / N° de tél. 645-452-678	
E-mail / Courriel électronique 645-452-678		Year / Année 2011		Month / Mois 11	
Receiving site address / Adresse du lieu de destination 4123 BYRNE RD BURNABY BC V5J 3H6		Day / Jour 11		Signature: 21111111	
Province BC		Province BC		Province BC	
Postal code / Code postal V5J 3H6		Postal code / Code postal V5J 3H6		Postal code / Code postal V5J 3H6	
Class / Classe Sub. class(es) / Classe(s) sub.		UN No. N° NU		Packing / risk gr. Gr. d'emballage / de risque	
Shipping name Appellation réglementaire		Quantity shipped Quantité expédiée		Units L or / ou Kg	
1978 Propylene Cages x9		5742 kg		9 01 S	
Notice No. N° de notification		Notice Line No. N° de ligne de la notification		Shipment Envoi	
Of / De		D or R code Code D ou R		C code Code C	
Basel Annex VIII or OECD Code		Annex VIII de Bâle ou Code OCDE		H code Code H	
Y code Code Y		Export Exportation		Import Importation	
National code in country of / Code du pays		Customs code(s) Code(s) de douanes		If handling code "Other" (specify) Si code de manutention « autre » (spécifier)	
International use only		Receiver / consignee certification: I certify that the information contained in Part C is correct and complete. Attestation du réceptionnaire / destinataire: J'atteste que tous les renseignements à la partie C sont exacts et complets.		Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie)	
Signature		Tel. No. / N° de tél. 645-452-678		Signature	
Special handling / Manutention spéciale Attached / Ci-joint: <input type="checkbox"/> As follows / Ci-contre: <input type="checkbox"/>		Date shipped / Date d'expédition Year / Année 2011		Time / Heure 11:11 AM	
Scheduled arrival date / Date d'arrivée prévue Year / Année 2011		Month / Mois 11		Day / Jour 11	
Retained by Consignor Gardée par l'expéditeur		Copy / Copie 2 (green / verte)		Copy 2 (green / verte)	

705

No. provincial

Below

Code postal

PM

Provincial ID No.

Decom. Veh.

MOE-2022-214

MOVEMENT DOCUMENT / MANIFEST
DOCUMENT DE MOUVEMENT / MANIFESTE

BC145177-4

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial						B Carrier Transporteur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial						Reference Nos. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés					
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING Mailing address / Adresse postale City / Ville Province Postal code / Code postal 11760 MITCHELL RD RICHMOND BC V6V 1V8 E-mail / Courriel électronique Tel. No. / N° de tél. SKYNOCH@RICHMONDSTEEL.CA Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD City / Ville Province Postal code / Code postal RICHMOND BC V6V 1V8						Company name / Nom de l'entreprise Environmental Mailing address / Adresse postale City / Ville Province Postal code / Code postal 4623 Burne Rd Burnaby BC E-mail / Courriel électronique Tel. No. / N° de tél. Vehicle / Véhicule Registration No. / N° d'immatriculation Prov. 24 Trailer - Rail car No. 1 1 ^{re} remorque - wagon FDC6119 Trailer - Rail car No. 2 2 ^e remorque - wagon Port of entry Point d'entrée International use only Port of exit Point de sortie International use only 25 Carrier Certification : I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. 26 Attestation du transporteur : J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au récepteur / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets. Name of authorized person (print): Tel. No. / N° de tél. Nom de l'agent autorisé (caractères d'imprimerie) Year / Année Month / Mois Day / Jour Signature :						C Receiver / consignee Réceptionnaire / destinataire Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous Company name / Nom de l'entreprise Mailing address / Adresse postale City / Ville Province Postal code / Code postal E-mail / Courriel électronique Tel. No. / N° de tél. Receiving site address / Adresse du lieu de destination Date received / Date de réception Time / Heure Year / Année Month / Mois Day / Jour AM PM If waste or recyclable material to be transferred, specify intended company name/ Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire 30 Registration No./Provincial ID No. N° d'immatriculation/d'id provincial					
Intended Receiver / consignee 2 Réceptionnaire / destinataire prévu SUMAS ENVIRONMENTAL Mailing address / Adresse postale City / Ville Province Postal code / Code postal 4623 BURNE RD BURNABY BC V5J 3N6 E-mail / Courriel électronique Tel. No. / N° de tél. Receiving site address / Adresse du lieu de destination 4623 BURNE RD City / Ville Province Postal code / Code postal BURNABY BC V5J 3N6						Class / Classe 5 Sub. class(es) / Classe(s) sub. UN No. N° NU Packing / risk gr. Gr. d'emballage/de risque 7 Quantity shipped Quantité expédiée Units L or / ou Kg Unités 8 Packaging/Contenant No. / N° Codes int-ext 9 Phys. state Etat phys. 10 Quantity received Quantité reçue Units L or / ou kg Unités 31 Comments Commentaires 32 Handling Code / Code de manutention 33 Shipment / Envoi Accepted / Refused / Accepté / Refusé 34 Decont. Pack. Cont. Veh. 35						Quantity received / Quantité reçue Comments / Commentaires Handling Code / Code de manutention Shipment / Envoi Accepted / Refused / Accepté / Refusé Decont. Pack. Cont. Veh.					
Pro. code Code prov. 3 Shipping name Appellation réglementaire 4 ANTI FREEZE Class / Classe 5 Sub. class(es) / Classe(s) sub. UN No. N° NU Packing / risk gr. Gr. d'emballage/de risque 7 Quantity shipped Quantité expédiée Units L or / ou Kg Unités 8 Packaging/Contenant No. / N° Codes int-ext 9 Phys. state Etat phys. 10 Quantity received Quantité reçue Units L or / ou kg Unités 31 Comments Commentaires 32 Handling Code / Code de manutention 33 Shipment / Envoi Accepted / Refused / Accepté / Refusé 34 Decont. Pack. Cont. Veh. 35						Notice No. N° de notification Notice Line No. N° de ligne de la notification Shipment Envoi Of / De D or R code Code D ou R C code Code C Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE H code Code H Y code Code Y National code in country of / Code du pays Export Exportation Import Importation Customs code(s) Code(s) de douanes						If handling code "Other" (specify) Si code de manutention « autre » (spécifier) Receiver / consignee certification : I certify that the information contained in Part C is correct and complete. / Attestation du réceptionnaire / destinataire : J'atteste que tous les renseignements à la partie C sont exacts et complets. Name of authorized person (print) Nom de l'agent autorisé (caractère d'imprimerie) Signature Tel. No. / N° de tél. Special handling / Manutention spéciale <input type="checkbox"/> Attached / Ci-joint <input type="checkbox"/> As follows / Ci-contre :					
Generator / consigneur certification: I certify that the information contained in Part A is correct and complete. I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. Attestation du producteur / expéditeur: J'atteste que tous les renseignements à la partie A sont exacts et complets. Je déclare que le contenu de ce chargement est décrit ci-dessus de façon complète et exacte par la désignation officielle de transport et qu'il est convenablement classé, emballé, marqué, étiqueté, muni de plaques-étiquettes et à tous égards bien conditionné pour être transporté						Name of authorized person (print) Nom de l'agent autorisé (caractère d'imprimerie) Signature Tel. No. / N° de tél. Date shipped / Date d'expédition Time / Heure Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour AM PM Year / Année Month / Mois Day / Jour						Retained by Consignor					

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

BC145178-2

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur				B Carrier Transporteur				C Receiver / consignee Réceptionnaire / destinataire			
Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				Reference Nos. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés			
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING				Company name / Nom de l'entreprise				Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous			
Mailing address / Adresse postale City / Ville Province Postal code / Code postal 11760 MITCHELL RD, RICHMOND V6V 1M				Mailing address / Adresse postale City / Ville Province Postal code / Code postal				Mailing address / Adresse postale City / Ville Province Postal code / Code postal			
E-mail / Courriel électronique Tel. No. / N° de tél. SKVNTYH@RICHMONDSTEEL.CA (604) 394 2089				E-mail / Courriel électronique Tel. No. / N° de tél. ()				E-mail / Courriel électronique Tel. No. / N° de tél. ()			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon Registration No. / N° d'immatriculation 8211 JF Prov. BC				Company name / Nom de l'entreprise			
Intended Receiver / consignee Réceptionnaire / destinataire prévu GLENVIEW MECHANICAL Mailing address / Adresse postale City / Ville Province Postal code / Code postal 780 VANTAGEWAY, DELTA BC V4G 1A7				Port of entry / Point d'entrée International use only Port of exit / Point de sortie International use only				Receiving site address / Adresse du lieu de destination 780 VANTAGEWAY, DELTA BC V4G 1A7			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.				Date received / Date de réception Year / Année Month / Mois Day / Jour Time / Heure <input type="checkbox"/> AM <input type="checkbox"/> PM			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				Name of authorized person (print): Nom de l'agent autorisé (caractères d'imprimerie) SUKNDAL BRND Tel. No. / N° de tél. 604 946 0506				If waste or recyclable material to be transferred, specify intended company name / Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				Year / Année Month / Mois Day / Jour Signature:				Registration No. / Provincial ID No. N° d'immatriculation / d'id. provincial			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				Class / Classe Sub. class(es) / Classe(s) sub. UN No. / N° NU Packing / risk gr. / Gr. d'emballage / de risque Quantity shipped / Quantité expédiée Units / L or / ou Kg / Unités Packaging / Contenant / Codes No. / N° Codes Int-ext Phys. state / État phys.				Quantity received / Quantité reçue Units / L or / ou Kg / Unités Comments / Commentaires Handling Code / Code de manutention Shipment / Envoi / Accepted / Refused / Accepté / Refusé Decont. / Veh. / Pack. / Veh.			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				National code in country of / Code du pays Export / Exportation Import / Importation Customs code(s) / Code(s) de douanes				If handling code "Other" (specify) Si code de manutention « autre » (spécifier)			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE H code / Code H Y code / Code Y				Receiver / consignee certification: I certify that the information contained in Part C is correct and complete. Attestation du réceptionnaire / destinataire: J'atteste que tous les renseignements à la partie C sont exacts et complets.			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				Notice No. / N° de notification Notice Line No. / N° de ligne de la notification Shipment / Envoi Of / De D or R code / Code D ou R C code / Code C				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) Tel. No. / N° de tél.			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				International use only				Signature			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				Special handling / Manutention spéciale <input type="checkbox"/> Attached / Ci-joint: <input type="checkbox"/> As follows / Ci-contre				Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour Time / Heure <input type="checkbox"/> AM <input type="checkbox"/> PM			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD Province Postal code / Code postal RICHMOND BC V6V 1M8				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) Signature				Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour			

Retained by Consignor
Gardée par l'expéditeur

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

BC147055-0

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

33151558

A Generator / consigneur Producteur / expéditeur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				B Carrier Transporteur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				Reference Nos. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés			
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING LTD				Company name / Nom de l'entreprise SES VENTURES LTD				C Receiver / consignee Réceptionnaire / destinataire Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial			
Mailing address / Adresse postale 15 BIZLOW				Mailing address / Adresse postale 4623 BYRNE ROAD BURNABY BC				Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous			
E-mail / Courriel électronique Tel. No. / N° de tél. 604-786-4397				E-mail / Courriel électronique Tel. No. / N° de tél. 604-682-6678				Company name / Nom de l'entreprise			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL ROAD				Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon 1540 JC BC				Mailing address / Adresse postale			
City / Ville RICHMOND BC 46V-1V8				Trailer - Rail car No. 2 2 ^e remorque - wagon N/A				City / Ville Province Postal code / Code postal			
Intended Receiver / consignee Réceptionnaire / destinataire prévu SUMAS ENVIRONMENTAL				Port of entry Point d'entrée International use only				Port of exit Point de sortie International use only			
Mailing address / Adresse postale City / Ville Province Postal code / Code postal AS BLOW				Carrier Certification : I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur : J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.				Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial 8096			
E-mail / Courriel électronique Tel. No. / N° de tél. 604-682-6678				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) DAE BAINI				Tel. No. / N° de tél. 604-682-6678			
Receiving site address / Adresse du lieu de destination 4623 BYRNE ROAD				Year / Année Month / Mois Day / Jour 21 11 29				Signature :			
City / Ville Province Postal code / Code postal BURNABY BC V5J3A6				Signature :				Date received / Date de réception Year / Année Month / Mois Day / Jour Time / Heure <input type="checkbox"/> A.M. <input type="checkbox"/> P.M.			
If waste or recyclable material to be transferred, specify intended company name/ Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire				Registration No. / Provincial ID No. N° d'immatriculation/d'id provincial				Quantity received Quantité reçue Units L or / ou Kg Unités			
Quantity received Quantité reçue Units L or / ou Kg Unités				Comments Commentaires				Handling Code / Code de manutention			
Quantity received Quantité reçue Units L or / ou Kg Unités				Comments Commentaires				Shipment / Envoi Accepted / Refused Accepté / Refusé			
Quantity received Quantité reçue Units L or / ou Kg Unités				Comments Commentaires				Decont. Pack. Cont. Veh. Cont. Véhic.			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Shipment Envoi			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Of / De			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				D or R code Code D ou R			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				C code Code C			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				H code Code H			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Y code Code Y			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Export Exportation			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Import Importation			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Customs code(s) Code(s) de douanes			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				National code in country of / Code du pays			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				If handling code "Other" (specify) Si code de manutention « autre » (spécifier)			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Receiver / consignee certification : I certify that the information contained in Part C is correct and complete. / Attestation du réceptionnaire / destinataire : J'atteste que tous les renseignements à la partie C sont exacts et complets.			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie)			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Signature			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Tel. No. / N° de tél. ()			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Special handling / Manutention spéciale Attached / Ci-joint : <input type="checkbox"/> As follows / Ci-contre : <input type="checkbox"/>			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Time / Heure <input type="checkbox"/> A.M. <input type="checkbox"/> P.M.			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Signature			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Tel. No. / N° de tél. 604-326-3275			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Time / Heure <input type="checkbox"/> A.M. <input type="checkbox"/> P.M.			
Notice No. N° de notification				Notice Line No. N° de ligne de la notification				Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour			

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

BC145181-6

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				B Carrier Transporteur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				Reference Nos. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés									
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING				Company name / Nom de l'entreprise CANNON PARK				C Receiver / consignee Réceptionnaire / destinataire Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial									
Mailing address / Adresse postale 11760 MITCHELL RD BC V6V 1V8				Mailing address / Adresse postale 11623 Byrne Rd Burnaby BC				Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous									
E-mail / Courriel électronique RICHMONDSTEEL@RICMONDSTEELIA				E-mail / Courriel électronique Tel. No. / N° de tél.				Company name / Nom de l'entreprise									
Receiving site address / Adresse du lieu de l'expédition 11760 MITCHELL RD BC V6V 1V8				Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon Registration No. / N° d'immatriculation FDG 9119 Prov. 24 BC				Mailing address / Adresse postale									
Intended Receiver / consignee Réceptionnaire / destinataire prévu SUMAS ENVIRONMENTAL				Port of entry Point d'entrée International use only				Port of exit Point de sortie International use only									
Mailing address / Adresse postale 11623 BYRNE RD BURNABY V5T 2H6				Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.				Date received / Date de réception Year / Année Month / Mois Day / Jour Time / Heure 21 11 2016 4:06 PM									
E-mail / Courriel électronique Tel. No. / N° de tél.				Name of authorized person (print): Nom de l'agent autorisé (caractères d'imprimerie): Signature: 604882406				If waste or recyclable material to be transferred, specify intended company name / Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire									
Receiving site address / Adresse du lieu de destination 11623 BYRNE RD BURNABY BC V5T 2H6				Year / Année Month / Mois Day / Jour 21 11 2016				Registration No. / Provincial ID No. N° d'immatriculation/d'id provincial									
Prov. code Code prov.		Shipping name Appellation réglementaire		Class / Classe Sub. class(es) Classe(s) sub.		UN No. N° NU		Packing / risk gr. Gr. d'emballage/ de risque		Quantity shipped Quantité expédiée		Units L or / ou Kg Unités		Packaging/Contentant No. / N° Codes Int-ext		Phys. state État phys.	
N/A		WASTE COOLANT		N/A		N/A		N/A		180		L		01 03		L	
11		12		13		14		15		16		17		18		19	
Notice No. N° de notification		Notice Line No N° de ligne de la notification		Shipment Envoi		Of / De		D or R code Code D ou R		C code Code C		Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE		H code Code H		Y code Code Y	
International use only																	
Receiver / consigneur certification: I certify that the information contained in Part A is correct and complete. I hereby declare that contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. Attestation du producteur / expéditeur: J'atteste que tous les renseignements à la partie A sont exacts et complets. Je déclare que le contenu de ce chargement est décrit ci-dessus de façon complète et exacte par la désignation officielle de transport et qu'il est correctement classé, emballé, marqué, étiqueté, muni de plaques-étiquettes et à tous égards bien conditionné pour être transporté																	
Name of authorized person (print) Nom de l'agent autorisé (caractère d'imprimerie) Signature: Joshua Shinger																	
Tel. No. / N° de tél. 604 326 3275																	
Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour 21 11 2016																	
Time / Heure 4:06 PM																	
Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour																	
Page 231 of 282 MOE-2022-21491																	

Retained by Consignor

MOVEMENT DOCUMENT / MANIFEST
DOCUMENT DE MOUVEMENT / MANIFESTE

BC145182-4

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur		B Carrier Transporteur		C Receiver / consignee Réceptionnaire / destinataire	
1 Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		23 Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		24 Reference Nos. of other movement document(s) / manifest(s) used / N° de référence des autres documents de mouvement / manifestes utilisés	
3 Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING		3 Company name / Nom de l'entreprise SUMAS ENVIRONMENTAL SERVICE		25 Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous	
4 Mailing address / Adresse postale 11760 MITCHELL RD RICHMOND BC V6V 1B8		4 Mailing address / Adresse postale 4103 BYRNE RD BURNABY BC V5J 3H6		26 Company name / Nom de l'entreprise SUMAS ENVIRONMENTAL	
5 Tel. No. / N° de tél. (604) 394-1039		5 Tel. No. / N° de tél. (604) 821-6678		27 Mailing address / Adresse postale 4103 BYRNE RD BURNABY BC V5J 3H6	
6 Province BC		6 Province BC		28 City / Ville BURNABY	
7 Postal code / Code postal V6V 1B8		7 Postal code / Code postal V5J 3H6		29 E-mail / Courriel électronique ()	
8 Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon		8 Registration No. / N° d'immatriculation M116288		30 Receiving site address / Adresse du lieu de destination 4103 BYRNE RD BURNABY BC V5J 3H6	
9 Trailer - Rail car No. 2 2 ^e remorque - wagon		9 Prov. 24 BC		31 Date received / Date de réception Year / Année: 21 Month / Mois: 1 Day / Jour: 21	
10 Port of entry Point d'entrée		10 Port of exit Point de sortie		32 Time / Heure <input type="checkbox"/> A.M. <input type="checkbox"/> P.M.	
11 Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.		11 Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie):		33 If waste or recyclable material to be transferred, specify intended company name / Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire	
12 Signature (Signature)		12 Tel. No. / N° de tél. (604) 821-6678		34 Registration No. / Provincial ID No. N° d'immatriculation / d'id. provincial	
13 Year / Année: 21 Month / Mois: 1 Day / Jour: 21		13 Signature: (Signature)		35 Quantity received / Quantité reçue	
14 Shipping name Appellation réglementaire		14 Class / Classe Sub. class(es) / Classe(s) sub.		36 Units L or / ou Kg / Unités	
15 UN No. N° NU		15 Packing / risk gr. Gr. d'emballage / de risque		37 Comments Commentaires	
16 Quantity shipped Quantité expédiée		16 Units L or / ou Kg / Unités		38 Handling Code / Code de manutention	
17 Packaging / Contenant No. / N°		17 Codes Int-ext.		39 Shipment / Envoi Accepted / Refused / Acepté / Refusé	
18 Phys. state Etat phys.		18 National code in country of / Code du pays		40 Decort. / Veh. Cont.	
19 Notice Line No. N° de ligne de la notification		19 Shipment / Envoi		41 If handling code "Other" (specify) Si code de manutention « autre » (spécifier)	
20 D or R code Code D ou R		20 C code Code C		42 Receiver / consignee certification: I certify that the information contained in Part C is correct and complete. / Attestation du réceptionnaire / destinataire: J'atteste que tous les renseignements à la partie C sont exacts et complets.	
21 Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE		21 H code Code H		43 Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie)	
22 Y code Code Y		22 Export Exportation		44 Signature (Signature)	
23 Import Importation		23 Customs code(s) Code(s) de douanes		45 Tel. No. / N° de tél. ()	
International use only					
46 Special handling / Manutention spéciale <input type="checkbox"/> Attached / Ci-joint <input type="checkbox"/> As follows / Ci-contre:					
47 Date shipped / Date d'expédition Year / Année: 21 Month / Mois: 1 Day / Jour: 21					
48 Time / Heure <input type="checkbox"/> A.M. <input type="checkbox"/> P.M.					
49 Scheduled arrival date / Date d'arrivée prévue Year / Année: 21 Month / Mois: 1 Day / Jour: 21					
50 Signature (Signature)					
51 Retained by Consignor					

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

BC145183-2

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		B Carrier Transporteur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		23 Reference Nos. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés	
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING		Company name / Nom de l'entreprise SCL VENTURES LTD		28 C Receiver / consignee Réceptionnaire / destinataire Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial	
Mailing address / Adresse postale City / Ville Province Postal code / Code postal 11760 MITCHELL RD RICHMOND BC V6V 1V8		Mailing address / Adresse postale City / Ville Province Postal code / Code postal 4623 BYRNE RD. BURNABY BC		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous	
E-mail / Courriel électronique SKVNCXH@RICHMONDSTEEL.CA		E-mail / Courriel électronique 604-892-6678		Company name / Nom de l'entreprise	
Shipping site address / Adresse du lieu de l'expédition City / Ville Province Postal code / Code postal 11760 MITCHELL RD RICHMOND BC V6V 1V8		Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon Registration No. / N° d'immatriculation FD6921 BC		Mailing address / Adresse postale	
Intended Receiver / consignee Réceptionnaire / destinataire prévu 2 Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial UMAS ENVIRONMENTAL 8096		Port of entry Point d'entrée International use only		Port of exit Point de sortie International use only	
Mailing address / Adresse postale City / Ville Province Postal code / Code postal 4623 BYRNE RD BURNABY BC V5J 4H6		Carrier Certification : I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur : J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.		Date received / Date de réception Year / Année Month / Mois Day / Jour 21 12 13	
E-mail / Courriel électronique 604-892-6678		Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) DAL BAIRNS		Time / Heure A.M. P.M.	
Shipping site address / Adresse du lieu de destination City / Ville Province Postal code / Code postal 4623 BYRNE RD BURNABY BC V5J 4H6		Signature Year / Année Month / Mois Day / Jour 21 12 13		If waste or recyclable material to be transferred, specify intended company name/ Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire	
Shipping name Appellation réglementaire N/A WASTE OIL		Class / Classe Sub. class(es) Classe(s) sub. N/A N/A		Quantity shipped Quantité expédiée 373 L 01 03 L	
UN No. N° NU N/A		Packing / risk gr. Gr. d'emballage/ de risque N/A		Units L or / ou Kg Unités L	
Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE N/A		H code Code H N/A		Y code Code Y N/A	
National code in country of / Code du pays N/A		Export Exportation N/A		Import Importation N/A	
Customs code(s) Code(s) de douanes N/A		Phys. state État phys. L		Quantity received Quantité reçue 373 L 01 03 L	
Units L or / ou Kg Unités L		Packaging/Contentant Codes Int-ext. 01 03		Comments Commentaires N/A	
Handling Code / Code de manutention N/A		Shipment / Envoi Accepted Refused N/A		Decont. Pack. Cont. Veh. N/A	
If handling code "Other" (specify) Si code de manutention « autre » (spécifier)		Receiver / consignee certification : I certify that the information contained in Part C is correct and complete. Attestation du réceptionnaire / destinataire : J'atteste que tous les renseignements à la partie C sont exacts et complets.		Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie)	
Signature		Signature		Tel. No. / N° de tél. ()	
Special handling / Manutention spéciale Attached / Ci-joint As follows / Ci-contre :		Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour 21 12 13		Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour 21 12 13	
Retained by Consignor Gardée par l'expéditeur		Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) JANCY Shinger		Tel. No. / N° de tél. (604) 363275	

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

BC145184-0

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				B Carrier Transporteur Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				Reference Nos. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés			
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING				Company name / Nom de l'entreprise SUMAS ENVIRONMENTAL				C Receiver / consignee Réceptionnaire / destinataire Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial			
Mailing address / Adresse postale 11760 MITCHELL RD RICHMOND BC				Mailing address / Adresse postale 11760 MITCHELL RD RICHMOND BC				Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous			
E-mail / Courriel électronique SKYNOCH@RICHMONDSTEEL.COM				E-mail / Courriel électronique 11760 MITCHELL RD RICHMOND BC				Company name / Nom de l'entreprise SUMAS ENVIRONMENTAL			
Shipping site address / Adresse du lieu de l'expédition 11760 MITCHELL RD RICHMOND BC				Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon				Mailing address / Adresse postale 11760 MITCHELL RD RICHMOND BC			
Intended Receiver / consignee Réceptionnaire / destinataire prévu				Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial				City / Ville RICHMOND BC			
Mailing address / Adresse postale 11760 MITCHELL RD RICHMOND BC				Port of entry Point d'entrée				Port of exit Point de sortie			
E-mail / Courriel électronique SKYNOCH@RICHMONDSTEEL.COM				Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.				Date received / Date de réception Year / Année Month / Mois Day / Jour			
Shipping site address / Adresse du lieu de destination 11760 MITCHELL RD RICHMOND BC				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie):				Time / Heure <input type="checkbox"/> A.M. <input type="checkbox"/> P.M.			
Year / Année Month / Mois Day / Jour 2011 / 12 / 20				Signature:				If waste or recyclable material to be transferred, specify intended company name/ Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire			
Shipping name Appellation réglementaire WASTE COOLANT				Class / Classe Sub. class(es) Class(es) sub.				Quantity shipped Quantité expédiée 136 L or / ou Kg			
UN No. N° NU				Packing / risk gr. Gr. d'emballage/ de risque				Units L or / ou Kg			
National code in country of / Code du pays				Customs code(s) Code(s) de douanes				Quantity received Quantité reçue			
Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE				H code Code H				Comments Commentaires			
Y code Code Y				Export Exportation				Handling Code / Code de manutention			
Import Importation				Shipment / Envoi Accepted / Refused Accepté / Refusé				Decort. Pack. Cont.			
International use only				If handling code "Other" (specify) Si code de manutention « autre » (spécifier)				Receiver / consignee certification: I certify that the information contained in Part C is correct and complete. Attestation du réceptionnaire / destinataire: J'atteste que tous les renseignements à la partie C sont exacts et complets.			
Signature				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie)				Tel. No. / N° de tél.			
Special handling / Manutention spéciale <input type="checkbox"/> Attached / Ci-joint: <input type="checkbox"/> As follows / Ci-contre:				Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour				Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour			
Retained by Consignor				Page 234 of 282				MOE 2022-21491			

MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

77 152298

BC145185-7

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

A Generator / consigneur Producteur / expéditeur		B Carrier Transporteur		C Receiver / consignee Réceptionnaire / destinataire	
Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial		Reference Nos. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés	
Company name / Nom de l'entreprise RICHMOND STEEL RECYCLING		Company name / Nom de l'entreprise SUMAS ENVIRONMENTAL SERVICES		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire sont les mêmes qu'à la Partie A <input type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous	
Mailing address / Adresse postale City / Ville Province Postal code / Code postal 11760 MITCHELL RD. BC V6V1V8		Mailing address / Adresse postale City / Ville Province Postal code / Code postal 4623 BYRNE RD. BURNABY V5T2H6		Company name / Nom de l'entreprise Mailing address / Adresse postale City / Ville Province Postal code / Code postal E-mail / Courriel électronique Tel. No. / N° de tél. klynach@richmondsteel.ca 604 394-2039	
Receiving site address / Adresse du lieu de destination 11760 MITCHELL ROAD RICHMOND BC V6V1V8		Vehicle / Véhicule Trailer - Rail car No. 1 1 ^{re} remorque - wagon Trailer - Rail car No. 2 2 ^e remorque - wagon Registration No. / N° d'immatriculation 1540 DC BC N/A		Date received / Date de réception Year / Année Month / Mois Day / Jour 21 11 22 9	
Intended Receiver / consignee Réceptionnaire / destinataire prévu SUMAS ENVIRONMENTAL Mailing address / Adresse postale City / Ville Province Postal code / Code postal 4623 BYRNE RD. BURNABY BC V5T2H6 Tel. No. / N° de tél. 604 682 6678		Port of entry Point d'entrée International use only Port of exit Point de sortie International use only Carrier Certification : I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur : J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.		Time / Heure Year / Année Month / Mois Day / Jour 21 11 22 9	
Receiving site address / Adresse du lieu de destination 4623 BYRNE RD. BURNABY BC V5T2H6		Name of authorized person (print): Nom de l'agent autorisé (caractères d'imprimerie): G. PHILLON Year / Année Month / Mois Day / Jour 21 11 22 9		If waste or recyclable material to be transferred, specify intended company name/ Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire Registration No./Provincial ID No. N° d'immatriculation/d'id provincial	
Shipping name Appellation réglementaire WASTE OIL (BCHWR)		Class / Classe Sub. class(es) Classe(s) sub. UN No. N° NU Packing / risk gr. Gr. d'emballage/ de risque N/A Quantity shipped Quantité expédiée 299 Units L or / ou Kg Unités L		Packaging/Contenant Codes Int-ext. 01 03 Phys. state État phys. L	
National code in country of / Code du pays Customs code(s) Code(s) de douanes		Export Exportation Import Importation		Quantity received Quantité reçue Units L or / ou Kg Unités 299 Comments Commentaires Handling Code / Code de manutention 01 03 Shipment / Envoi Accepted Refused Refusé	
Signature ()		Signature ()		Signature ()	
Special handling / Manutention spéciale <input type="checkbox"/> Attached /Ci-joint <input type="checkbox"/> As follows /Ci-contre 21 11 22 9		Date shipped / Date d'expédition Year / Année Month / Mois Day / Jour 21 11 22 9		Scheduled arrival date / Date d'arrivée prévue Year / Année Month / Mois Day / Jour 21 11 22 9	
Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) G. PHILLON		Tel. No. / N° de tél. 604 394 2039		Page 235 of 282 MOE-2022-21491	

International use only

PLACARDS REQUIRED IN CASE OF EMERGENCY

2022-01-14 Richmond Steel Recycling Pollution Prevention Order 110800 Amendment 5

From: Enick, Oana V ENV:EX
To: Harbinder Dhillon <HDhillon@richmondsteel.ca>, Steven Kynoch <SKynoch@richmondsteel.ca>
Cc: Karl Gustafson <Karl.Gustafson@mcmillan.ca>, Sebastien.Rosner@simsmm.com, Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>, Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>, wmills@richmond.ca, Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>, Compliance Admin ENV:EX <Compliance.Admin@gov.bc.ca>
Sent: January 14, 2022 4:45:38 PM PST
Attachments: 2022-01-14 Amdt 5 PPO110800.pdf, image001.png, image005.jpg, image006.jpg, image003.jpg, 2021-11-07 Amended Order Appendices Nov 2021.pdf
Hello:

Please find attached Pollution Prevention Order 110800 Amendment 5 and the Order appendices (no changes were made to the appendices), clarifying the requirement to analyse for PCBs.

Please acknowledge receipt of this email by replying to this message by selecting "Reply All". Please write "received" in the email body as confirmation within 5 business days. In doing so, you are confirming that you are able to read its contents and open all attachments. If you are not able to open the attachments, please indicate this immediately as this may affect legislated time limits that prescribe your rights or obligations.

Regards,



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456
More information about Environmental Compliance and how it is assessed can be found [here](#).



August 5, 2021

Amended: August 10, 2021, September 1, 2021, November 30, 2021

Amended: December 13, 2021 and December 13, 2021 Corrected

Amended: January 14, 2022

Order Number: 110800

Via email: skynoch@richmondsteel.ca and HDhillon@richmondsteel.ca

Richmond Steel Recycling Limited
11760 Mitchell Road
Richmond, BC V6V 1V8

Attention: Steven Kynoch, Regional SHECS Manager and Harbinder Dhillon, President

Pollution Prevention Order – Richmond Steel Recycling Ltd.

This Order is being issued under Section 81 of the *Environmental Management Act* (EMA), SBC 2003, C. 53. **This Order supersedes the versions issued on August 5, 2021, August 10, 2021, September 1, 2021, November 30, 2021 and December 13, 2021.** I am satisfied on reasonable grounds that an activity at Richmond Steel Recycling Ltd. (Richmond Steel) located at 11760 Mitchell Road, Richmond, British Columbia (the Site) is being performed by a person in a manner that is likely to release effluent that will cause pollution. Specifically, the Richmond Steel facility is located on the described land parcel:

Lot 8 Except Part Plan 49844 District Lot 459 Group 1 New Westminster
District Plan 47113

GROUND FOR ISSUANCE

I am satisfied that Richmond Steel is a person who:

- previously had or now has possession, charge or control of the substance;
- previously did anything, or who is now doing anything, which may cause the release of the substance; or
- previously owned or occupied, or now owns or occupies, the land on which the substance is located.

The substance likely to be released in a manner that will cause pollution is effluent from a facility classified in the *Waste Discharge Regulation* Schedule I as a “Commercial Waste Management and/or Waste Disposal Industry” and/or “Hazardous Waste Management” and in Schedule II as a “Vehicle Dismantling and Recycling Industry”.

As per their Environmental Management Plan (2021) (EM Plan), Richmond Steel, “a joint venture between Sims Metal Management and Nucor Corporation, has been operating since the early 1970s, [with] the primary onsite operations including metal recycling, wet vehicle handling and recycling, mobile car crushing, industrial bin services, building demolishing, and maritime salvage”. As per their Drainage & Mitigation Plan (2021) (D&M Plan), all stormwater on the site is directed to the bioswale area and ditch which flows directly into the Fraser River.

On December 12, 2019, Environment and Climate Change Canada (ECCC) enforcement staff “witnessed a pool of sediment-laden water with a grey sheen on its surface... directly adjacent to the Fraser River...” and “witnessed sediment-laden water with a grey sheen flowing from the aforementioned pool of water towards the Fraser River and discharging directly into the Fraser River from the foreshore of the property”. ECCC staff further “witnessed a grey sheen spreading across the surface of the Fraser River, originating at the flow of water discharging from foreshore of the property” (ECCC Warning Letter).

ECCC staff collected samples “from the aforementioned flow of water into the Fraser River and from a treatment ditch on the East side of the property”, flowing into the Fraser River. These samples were analysed at the ECCC, Pacific & Yukon Laboratory for Environmental Testing and ECCC shared the results with the Ministry of Environment and Climate Change Strategy (Ministry). The results showed levels of aluminum, copper, zinc, polychlorinated biphenyl (Arochlor-1242), naphthalene, benz(a)anthracenes, and pyrene to be above British Columbia Water Quality Guidelines (BCWQG), as listed in the summary table below (Table 1):

Table 1: Summary Table of ECCC samples collected on December 12, 2019. (Grey highlights indicate values either below BCWQG or between phototoxic and non-phototoxic). Source: 2020-01-28 V19L036_1 Detailed ECCC Results

Parameter	ECCC Results Bioswale	ECCC Results Shore/Dock	BCWQG
COD	506 mg/L	472 mg/L	
TSS	271 mg/L	2170 mg/L	
Aluminum (dissolved)	0.11 mg/L	0.12 mg/L	0.1 Acute mg/L 0.05 Chronic mg/L
Copper dissolved (mg/L)	0.45 mg/L (pH 7.3, Hardness 130, DOC 10*) *mid-range estimate for DOC	0.010 mg/L (pH 7.9, Hardness 150, DOC 10*) *mid-range estimate for DOC	0.0179 Acute mg/L 0.00298 Chronic mg/L 0.0348 Acute mg/L 0.00594 Chronic mg/L
Zinc, total (mg/L)	2.46 mg/L	14.6 mg/L	0.063 Acute mg/L 0.0375 Chronic mg/L
PCB, total (µg/L)	10.1 µg/L = 10100 ng/L	20.8 µg/L = 20800 ng/L	0.1 ng/L Acute (HWR = 0.005 mg/L = 5000ng/L)
Naphthalene (ug/L)	4.97 µg/L	0.52 µg/L	1 µg/L
Benz(a)anthracenes (ug/L)	0.44 µg/L	0.49 µg/L	0.1 µg/L Chronic
Fluoranthene	0.65 µg/L	1.12 µg/L	0.2 µg/L Phototoxic 4 µg/L Non-phototoxic
Pyrene	0.70 µg/L	1.14 µg/L	0.02 µg/L Chronic

In response to ECCC's findings, "*RSR retained Pottinger Gaherty Environmental Consultants Ltd. (PGL) to develop a Stormwater Management and Mitigation Plan (the Stormwater Plan) [that] included undertaking additional investigation of site conditions to help inform RSR's decisions as to the steps required to manage stormwater effectively*" (Update Letter, March 15, 2021).

In May 2021, Richmond Steel submitted updated D&M and EM Plans. Neither documents include sampling specifics or analytical results and neither documents propose an on-going sampling, monitoring, and reporting schedule (D&M Plan, 2021 and EM Plan, 2021).

On July 2, 2020, Ministry staff conducted an inspection of the Richmond Steel facility and assessed compliance with the *Hazardous Waste Regulation* (HWR), Section 17(1)(b), as not-determined because facility staff were unable to locate sample records. Richmond Steel staff later reported in a July 15, 2020, email that they "*did not find any reports or records of a storm water sampling program*". The inspection report concludes that "*there were no sample records*".

On April 26, 2021, Ministry staff again requested the sampling records to demonstrate compliance with HWR, Section 17(1)(b), and no records were provided. In direct response to the issue of HWR, Section 17(1)(b) records, Richmond Steel stated in a May 7, 2021, email – Compliance Advisory Table that "*Richmond Steel Recycling is not a Hazardous Waste Storage facility*" but do acknowledge in that same email that '*Sch. 1.2 does apply to the discharge*' (email, May 7, 2021).

On March 23, 2021, in an update letter to the City of Richmond, Mr. Keith Gagne, P.Eng, of PGL Environmental Consultants suggests that potential pollution is ubiquitous throughout the site and is on-going "*PCBs were non-detect (N.D.) in the soil samples; however, surface water throughout the Site exceeded BC Water Quality Guidelines. RSR was unable to isolate the PCB impacts to one area. It appears that the low levels of PCBs are likely related to ongoing activities, regardless of the controls RSR has or might reasonably put in place to prevent PCB materials from entering the Site.*"

Between September 1, 2021 and the date of this amendment and consistent with requirements of this Order, RSR has submitted multiple documents. These documents confirm activities and operations at the Site and identify various contaminants of potential concern and their ubiquitous presence on the Site and in the effluent.

Based on this information, I am satisfied on reasonable grounds that this activity/operation is being performed in a manner that is likely to release a substance that will cause pollution. Furthermore, I conclude that an amendment of this Order is required, as follows:

ORDER

Pursuant to Section 81 of the *Environmental Management Act* [SBC 2003] Chapter 53, Richmond Steel is hereby ordered to comply with the required actions listed in the table below and to provide information to the Director indicating the completion of each action.

Item	Required Action	Required by midnight on:						
1.	<p>Implement an effluent monitoring programme which includes the following:</p> <table border="1" data-bbox="323 434 1174 813"> <thead> <tr> <th data-bbox="323 434 624 488">Sampling Locations*</th><th data-bbox="624 434 906 488">Summary Sampling Parameters**</th><th data-bbox="906 434 1174 488">Sampling Frequency</th></tr> </thead> <tbody> <tr> <td data-bbox="323 488 624 813"> <ul style="list-style-type: none"> Ditch Ditch/River </td><td data-bbox="624 488 906 813"> <ul style="list-style-type: none"> Polychlorinated biphenyls (PCBs) Petroleum hydrocarbons Polycyclic aromatic hydrocarbons Total and Dissolved Metals Solvents and Glycols Total Suspended Solids PH, Hardness & Conductivity Biological Oxygen Demand Chemical Oxygen Demand Toxicity 96 hr trout LC₅₀*** Toxicity 96 hr Daphnia LC₅₀ </td><td data-bbox="906 488 1174 813"> <ul style="list-style-type: none"> Monthly, starting no later than November 26, 2021. and During or Immediately after significant rain events*** </td></tr> </tbody> </table> <p>* Sampling Locations as identified on RSR WCPv3, October 2021 Figure 2 and attached as Order Appendix A.</p> <p>** Sampling Parameters as detailed in RSR WCPv3, October 2021 Appendix 1 – Expanded List of PCOCs and attached as Order Appendix B and for which there are Approved or Working BC Water Quality Guidelines, except Polychlorinated biphenyls (PCBs). For PCBs, sampling parameters include PCB sum of total and all Arochlor and PCB congeners listed in the RSR WCPv3, October 2021 Appendix 1 – Expanded List of PCOCs and attached as Order Appendix B.</p> <p>***Immediately following significant rain events: - significant rain event is defined as a period of precipitation which meets or exceeds the intensity of 25 mm in 24 hrs as reported by Environment Canada at <u>Vancouver Intl A</u> station and - during or immediately following means within 12 hours of EC recording precipitation equal to or <u>in excess of</u> 25 mm in 24 hrs. (NOTE: EC's rainfall data can be determined on a daily or hourly basis, as needed).</p>	Sampling Locations*	Summary Sampling Parameters**	Sampling Frequency	<ul style="list-style-type: none"> Ditch Ditch/River 	<ul style="list-style-type: none"> Polychlorinated biphenyls (PCBs) Petroleum hydrocarbons Polycyclic aromatic hydrocarbons Total and Dissolved Metals Solvents and Glycols Total Suspended Solids PH, Hardness & Conductivity Biological Oxygen Demand Chemical Oxygen Demand Toxicity 96 hr trout LC₅₀*** Toxicity 96 hr Daphnia LC₅₀ 	<ul style="list-style-type: none"> Monthly, starting no later than November 26, 2021. and During or Immediately after significant rain events*** 	February 10, 2022
Sampling Locations*	Summary Sampling Parameters**	Sampling Frequency						
<ul style="list-style-type: none"> Ditch Ditch/River 	<ul style="list-style-type: none"> Polychlorinated biphenyls (PCBs) Petroleum hydrocarbons Polycyclic aromatic hydrocarbons Total and Dissolved Metals Solvents and Glycols Total Suspended Solids PH, Hardness & Conductivity Biological Oxygen Demand Chemical Oxygen Demand Toxicity 96 hr trout LC₅₀*** Toxicity 96 hr Daphnia LC₅₀ 	<ul style="list-style-type: none"> Monthly, starting no later than November 26, 2021. and During or Immediately after significant rain events*** 						
2.	<p>Monthly reporting:</p> <p>By the 10th of each month, Richmond Steel must provide an update of activities from the month previous. These monthly updates must include:</p> <ol style="list-style-type: none"> certification from the Qualified Professional regarding testing protocols, interpretation, and update information, a summary of activities completed towards complying with requirement 1 of the order, analytical results for Item 1, interpretation of the results, including comparison to standards in the British Columbia Water Quality Guidelines and the Hazardous Waste Regulation, and rationale for conclusions reached, pertinent photographs, drawings, maps and other documentation, and summary of daily precipitation as recorded at Vancouver Intl A station, demonstrating maximum precipitations within a 24 hour period. <p>This requirement will remain in place until this Order is cancelled by the Director.</p>	On the 10 th day of every month starting on September 10, 2021.						

Item	Required Action	Required by midnight on:
3.	The qualified professional(s) performing any of the following in response to this order: performing work, authoring reports, and/or providing opinions must complete and submit the attached Declaration of Competency and Conflict of Interest Disclosure Statement forms.	First QP submission of past, current or future work

For the purposes of this Order, the following definition applies:

"Qualified Professional" means an applied scientist or technologist specializing in a particular applied science or technology, including agrology, biology, chemistry, engineering, geology or hydrogeology, who (a) is registered in British Columbia with the professional organization responsible for his or her area of expertise, acting under that professional association's code of ethics and subject to disciplinary action by that association, and (b) through suitable education, experience, accreditation and knowledge, may be reasonably relied on to provide advice within his or her area of expertise as it relates to this order, or (c) is approved by the Director.

DUTY TO COMPLY

The requirements above must be completed on or before the associated "Required By" date. Failure to comply with the requirements of this order is a contravention of the *Environmental Management Act* [SBC 2003, c.53] and may result in legal action. I direct your attention to Section 120(10) of the *Environmental Management Act*, which reads:

"(10) A person who contravenes an order...that is given, made or imposed under this Act by a ...director...commits an offence and is liable on conviction to a fine not exceeding \$300 000 or imprisonment for not more than 6 months, or both."

Failure to comply with the requirements of this order may also result in an administrative penalty under the Administrative Penalties Regulation (*Environmental Management Act*) [B.C. Reg 133/2014] (Regulation). I direct your attention to Section 12(4) of the Regulation, which reads:

"(4) A person who fails to comply with an order under the [Environmental Management] Act is liable to an administrative penalty not exceeding \$40,000."

RIGHT TO APPEAL

This decision may be appealed to the Environmental Appeal Board in accordance with Part 8 of the *Environmental Management Act*. An appeal must be delivered within 30 days from the date notice of this order is given. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

NOTIFICATION OF PUBLICATION

The Party is notified that the Province intends to publish on the Ministry of Environment website the entirety of any Regulatory Document provided that:

- a) The Province will provide written notice to the party of its intent to publish the Regulatory Documents at least [14] days prior to publication;
- b) The Province will not publish any information what could not, if it were subject to a request under section 5 FOIPPA, be disclosed under the Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. 165 as amended from time to time.

This order will also appear in the Ministry of Environment's Quarterly Environmental Enforcement Summary and Environmental Violations Database.

MINISTRY CONTACT

If you have any questions, please contact the undersigned at Dan.Bings@gov.bc.ca or Environmental Protection Officer Oana Enick at 236-468-2231 and Oana.Enick@gov.bc.ca.

Regards,



Daniel P. Bings
for Director, *Environmental Management Act*
Compliance Operations Manager

Attachments:
2021-11-07 Amended Order Appendices Nov 2021

cc:

Catherine Allard
Senior Authorizations Officer, South Coast Regional Office
Ministry of Forests, Lands & Natural Resources Operations and Rural Development
Suite 200 – 10428 153 Street, Surrey, BC V3R 1E1
Catherine.Allard@gov.bc.ca

Gregory Lee
Inspector and Fishery Officer, Environmental Enforcement Directorate
Enforcement Branch, Environment and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street, Vancouver, BC, V6C 3S5.
Gregory.lee3@canada.ca

Warren Mills
Environmental Coordinator
6911 No. 3 Road, Richmond, BC V6Y 2C1
wmills@richmond.ca

RSR January 2022 Monthly report

From: Enick, Oana V ENV:EX
To: stephanie.major@dfo-mpo.gc.ca
Cc: Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>
Sent: January 19, 2022 1:54:16 PM PST
Attachments: PPO - Monthly Report 20220110.pdf, image002.jpg, image003.jpg, image004.jpg, image001.png

Hi Stephanie:

Here is the report I was quoting from. Thank you for looking into this.

Greg, as always, thank you as well.

Oana.



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

 @ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).



To: Dan Bings
for Director, Environmental Management Act
Compliance Operations Manager

Oana Enick
Environmental Protection Officer

From: Harbinder Dhillon
President, Richmond Steel Recycling Ltd.

Date: January 10, 2022

Re: **Pollution Prevention Order – Richmond Steel Recycling Ltd.**

This report is submitted by Richmond Steel Recycling Ltd. ("**RSR**") as required by Pollution Prevention Order Number 110800 as issued and corrected on December 13, 2021 (the "**PPO**"). Dealing, *seriatim*, with the enumerated items in the PPO, we report as follows:

Item #1 – An effluent monitoring programme has been developed and implemented with the assistance of Pottinger Gaherty Environmental Consultants Ltd. ("**PGL**") to meet the requirements outlined in the PPO.

Item #2 – The following is an update of relevant activities at the RSR site located at 11760 Mitchell Road, Richmond, British Columbia (the "**Site**") in December 2021:

- (a) Attached as Appendix 2(a) is a certification from PGL as the Qualified Professional regarding testing protocols, interpretation and update information.
- (b) A protocol for sampling runoff water at the two sampling locations specified in the PPO was developed by PGL. Attached as Appendix

2(b) is a copy of the protocol. Water samples were collected on December 10, 2021 at the "Ditch" and "River Ditch" sampling locations specified in the PPO in accordance with industry accepted standards and following the sampling protocol developed by PGL.

RSR received authorization in a letter from Fisheries and Oceans Canada ("DFO") dated December 9, 2021 for a proposal to remove contaminated sediment from the bioswale/ditch, the construction of a detention pond and new water treatment system and the remediation of a new bioswale. The authorization is subject to RSR taking a number of measures to avoid and mitigate the potential for killing fish and the harmful alteration, disruption or destruction of fish habitat. To reduce these potential risks, the proposed work must be conducted in a window of time between June 16 and February 28. The proposed remedial work and treatment facilities approved by DFO will help avoid or mitigate the risk of pollution identified in the PPO; however, RSR continues to await authorization from the BC provincial government to proceed with these measures.

- (c) The water samples collected on December 10, 2021 were submitted for analysis in accordance with the parameters set out in the PPO. PGL's summary of the analytical results and its interpretation thereof is set out in a report from PGL dated January 6, 2021 a copy of which is attached as Appendix 2(c). PGL's report includes a comparison to standards in the British Columbia Water Quality Guidelines and the Hazardous Waste Regulation.
- (d) Sampling photographs and other pertinent documentation are included in PGL's summary of surface water sampling results dated January 6, 2022, a copy of which is attached as Appendix 2(c).
- (e) Attached as Appendix 2(e) is a summary of the daily precipitation recorded in December 2021 at Vancouver International Airport. We were surprised to find that a 'significant rain event' had occurred on December 18, 2021. Because we were not aware of this circumstance, we failed to collect water samples. We apologize for this oversight which was caused by a number of extenuating circumstances. The event occurred on a Saturday when RSR has only four operators on site, none of whom were trained in the collection of water samples. For safety reasons, the sampling protocol requires that two persons be present when samples are collected. One of our staff members who would ordinarily have been assisting with respect to monitoring rainfall was off work following Covid protocols. Please also note that, effective January

4, 2022, RSR hired a new staff member whose responsibilities include, specifically, daily monitoring of rainfall totals and arranging for sampling in all circumstances as required by the PPO.

Arrangements have also been made for the new staff member to be trained on site by PGL with respect to the requirements of the sampling protocol. Our intent is to comply fully with the requirements of the PPO and we are confident that the steps we have already taken will ensure that this failure will not happen again.

Item #3 – PGL has previously submitted the required Declaration of Competency and Conflict of Interest Disclosure Statement forms. No other Qualified Professional performed any work, authored reports or provided opinions in December 2021.

Richmond Steely Recycling Ltd.



Harbinder Dhillon, President

RE: RSR January 2022 Monthly report

From: Enick, Oana V ENV:EX
To: Major, Stephanie <Stephanie.Major@dfo-mpo.gc.ca>, Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>
Sent: January 27, 2022 6:57:39 AM PST
Attachments: image001.png, image005.jpg, image006.jpg, image008.jpg, image003.jpg, image004.jpg
Hi Stephanie:

Thanks for following up on this, and thank you for keeping us in the loop. While I don't think MoE (me) should be present at the meeting, I do think it is a very good idea if you cc-ed me on the letter or written document that comes out of the meeting. It was a bit of a process obtaining a copy of the letter from RSR, so cc-ing us to start with should save everyone a lot of emails.

Thanks and have a great weekend, Oana.



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

@ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

From: Major, Stephanie <Stephanie.Major@dfo-mpo.gc.ca>
Sent: January 26, 2022 6:12 PM
To: Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>
Cc: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Subject: RE: RSR January 2022 Monthly report

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Thanks Greg and Oana.

I've spoken with my manager, and I think the next step should be to be in touch with Richmond Steel Recycling and clarify what the DFO Letter of Advice is (and is not). I'd like to set up a call with them – do you two want to be present for it, or would it be best if it was just with me to start? s.22 I'll be back on Mon.

Thank you,
Stephanie.

Stephanie Major

(she/her | elle/la)

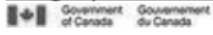
A/Section Head, Fish and Fish Habitat Protection Program
Ecosystems Management Branch
Fisheries and Oceans Canada / Government of Canada
Stephanie.Major@dfo-mpo.gc.ca / Cell: 604-418-9438

A/Chef de secteur, Programme de protection du poisson et de l'habitat du poisson
Programme de protection du poisson et de son habitat
Direction des écosystèmes
Pêches et Océans Canada / Gouvernement du Canada
Stephanie.Major@dfo-mpo.gc.ca / cell 604-418-9438

From: Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>
Sent: Wednesday, January 19, 2022 2:06 PM
To: Major, Stephanie <Stephanie.Major@dfo-mpo.gc.ca>
Cc: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Subject: RE: RSR January 2022 Monthly report

And here is the Fisheries Act warning letter that was issued to them in April of 2020.

Gregory Lee
Environmental Enforcement Officer
Environment Canada Enforcement Branch
Gregory.Lee3@Canada.ca | Cell: 604-404-2482



From: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: January 19, 2022 1:54 PM
To: stephanie.major@dfo-mpo.gc.ca
Cc: Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>
Subject: RSR January 2022 Monthly report

Hi Stephanie:

Here is the report I was quoting from. Thank you for looking into this.

Greg, as always, thank you as well.

Oana.



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

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Richmond Steel File.msg.ics

Sent: February 23, 2022 9:28:54 AM PST

Received: February 23, 2022 9:28:00 AM PST

File name: Richmond Steel File.msg.ics

File extension: ics

Priority: Normal (5)

Calendar Item Type: REQUEST

Moving this meeting to tomorrow to accommodate a multitude of other meeting today's. Thanks everyone. Oana.

Hello:

Let's hope this works for everyone. Every 4 weeks on Wednesdays at 11:00 am. Thanks, Oana.

To discuss Richmond Steel site on Mitchell Island.

Loose agenda:

1. Introductions and file status from each agency
2. New developments – from each agency
3. Next steps

Please let me know if you have a timing conflict and we need to find an alternate time.

Thanks, Oana.

s.15

Accepted_Richmond Steel File.msg.ics

Sent: February 23, 2022 10:57:44 AM PST

Received: February 23, 2022 10:57:50 AM PST

File name: Accepted_Richmond Steel File.msg.ics

File extension: ics

Priority: Normal (5)

Address: Pacific Standard Time

Calendar Item Type: REPLY

2022-04-28 RSR Pollution Abatement Order 111135

From: Environmental Compliance ENV:EX <environmentalcompliance@gov.bc.ca>
To: skynoch@richmondsteel.ca, Harbinder Dhillon <HDhillon@richmondsteel.ca>
Cc: Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>, Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>, Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>, Gregory.lee3@canada.ca, WMills@richmond.ca, Barlas, Sajid A ENV:EX <Sajid.Barlas@gov.bc.ca>
Sent: April 28, 2022 1:17:26 PM PDT
Attachments: image001.png, Declaration of Competency.pdf, 2022-04-28 PAO111135.pdf, image002.jpg, image004.jpg, image003.jpg, Conflict of Interest Disclosure.pdf, 2022-04-28 PAO111135.pdf

ACTION REQUIRED:

Please acknowledge receipt of this email by replying to this message by selecting "Reply All". Please send "received" in the email body as confirmation within five (5) business days.

In doing so, you are confirming that you are able to read its contents and open all attachments. If you are not able to open the attachments, please indicate this immediately as this may affect legislated time limits that prescribe your rights and obligations.

Good Afternoon,

On behalf of Daniel P. Bings, Compliance Operations Manager, Regional Operations Branch, Environmental Protection Division, with the Ministry of Environment and Climate Change Strategy, please see attached on the above-noted subject.

PAO111135

Regards,



Gina Tamm, BBA | Compliance Coordinator

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy

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To report a spill call the Provincial Emergency Program at 1-800-663-3456

 [@ComplianceBC](#) More information about Environmental Compliance and how it is assessed can be found [here](#).



April 28, 2022

Order Number: 111135

Via Email: skynoch@richmondsteel.ca and HDhillon@richmondsteel.ca

Richmond Steel Recycling Limited
11760 Mitchell Road
Richmond, BC V6V 1V8

Attention: Steven Kynoch, Regional SHECS Manager and Harbinder Dhillon, President

Pollution Abatement Order

This Order is being issued under Section 83 of the *Environmental Management Act* (EMA), SBC 2003, c. 53. I am satisfied on reasonable grounds that pollution is being caused by effluent from the Richmond Steel Recycling Ltd. (RSR) site located at 11760 Mitchell Road, Richmond, British Columbia (Site). Specifically, the Site is located on the described land parcel:

Lot 8 Except Part Plan 49844 District Lot 459 Group 1 New Westminster
District Plan 47113

Grounds for Issuance

I am satisfied that RSR is a party who:

- had possession, charge or control of the substance at the time it was introduced or escaped into the environment;
- owns or occupies the land on which the substance is located or on which the substance was located immediately before it was introduced into the environment; or,
- caused or authorized the pollution.

The specific substance being introduced into the environment is effluent from the facility at the Site, classified in the *Waste Discharge Regulation* (WDR) Schedule I as a “Commercial Waste Management and/or Waste Disposal Industry” and in Schedule II as a “Vehicle Dismantling and Recycling Industry” (Facility).

The usefulness of the environment has been substantially altered or impaired due to the presence of significantly high concentrations of contaminants, including but not limited to polychlorinated biphenyls (PCBs), metals and total suspended solids.

Per their Environmental Management Plan (2021) (EM Plan), RSR, “*a joint venture between Sims Metal Management and Nucor Corporation, has been operating since the early 1970s, [with] the primary onsite operations including metal recycling, wet vehicle handling and recycling, mobile car crushing, industrial bin services, building demolishing, and maritime salvage*”. These activities meet the definitions of ‘commercial waste management or waste disposal industry’ and ‘vehicle dismantling and recycling industry’. According to their Drainage & Mitigation Plan (D&M Plan, 2021), all effluent at the Site is directed to the bioswale area and ditch which flows directly into the Fraser River.

RSR requires an authorization under the EMA to discharge waste into the environment. RSR holds Registration 105725 under the *Vehicle Dismantling and Recycling Regulation* but does not hold a waste discharge authorization under EMA to discharge effluent into the environment from its business defined above as ‘commercial waste management or waste disposal industry’.

On December 12, 2019, Environment and Climate Change Canada (ECCC) enforcement staff collected samples from effluent discharged from the Site. The results showed levels of contaminants, including copper, zinc, polychlorinated biphenyl (Arochlor-1242), naphthalene, benz(a)anthracenes, and pyrene¹ to be above British Columbia Water Quality Guidelines (BC WQG) as highlighted in Table 1 and previously communicated to RSR.

[ECCC Warning Letter 2021-04-30]

On August 5, 2021, the Ministry of Environment and Climate Change Strategy (Ministry) issued Pollution Prevention Order 110800, which requested information on effluent characteristics and set ongoing monitoring requirements. RSR submitted records of effluent characteristics based on multiple sampling events in 2020 and 2021. This data is summarized in Table 1 and shows some polycyclic aromatic hydrocarbons (PAHs), PCBs and metals concentrations at least 100 times the BC WQG, with levels of PCB exceeding BC WQG by at least 10000 times².

[PPO 110800, current version 2022-01-10]

On November 4, 2021, the Ministry issued Inspection Report 179418 which determined that RSR was out of compliance with EMA section 6(2). The Ministry directed RSR to “*cease unauthorized discharges to the environment*” and requested them “*to proceed with obtaining a waste discharge authorization under the Environmental Management Act*”.

[IR 179418 2021-11-04]

¹ ECCC Warning Letter dated April 30, 2020, and Detailed ECCC Results 2020-01-28 V19L036_1

² Specific details are available in RSR’s submission to the Ministry on September 8, 2021.

Table 1: Summary of selected sampling events and parameter exceeded (Source: IR179418 2021-11-04 and RSR's September 8, 2021 submission)

Date	Sample collector and Sample ID	Parameter exceeded ³ bold text indicates exceedance by >10 times
Dec. 12, 2019	ECCC Bioswale	Cu, Zn , Naphthalene, benz(a)anthracene, fluoranthene, pyrene, PCB
Dec. 23, 2019	PGL Ditch ⁴	Cd, Cr, Cu, Fe, Pb, Mn, Hg, Ni, Zn toluene, benzo(a)pyrene, naphthalene, pyrene, PCB
April 22, 2020 ⁵	PGL Ditch	Cd, Cr, Cu, Fe, Pb, Mn, Hg, Ni, Zn benzo(a)pyrene, chrysene, fluoranthene, phenanthrene, pyrene
June 11, 2020	PGL Ditch	Cd, Cr, Cu, Fe, Pb, Mn, Hg, Ni, Zn acridine, benzo(a)pyrene, fluoranthene, pyrene, PCB
June 24, 2020	PGL Ditch	Cd, Cr, Cu, Fe, Pb, Mn, Hg, Ni, Zn toluene, acridine, benzo(a)pyrene, fluoranthene, pyrene, PCB
July 8, 2020	PGL Ditch	Cd, Cr, Cu, Fe, Pb, Mn, Ni, Zn toluene, anthracene, benz(a)anthracene, benzo(a)pyrene , chrysene, fluoranthene, phenanthrene, pyrene, PCB
July 22, 2020	PGL Ditch	Cd, Cr, Co, Cu, Fe, Pb, Mn, Ni, Zn Toluene, acridine, anthracene, benz(a)anthracene, benzo(a)pyrene, chrysene, fluoranthene, phenanthrene, pyrene, PCB
August 5, 2020	PGL Ditch	Cd, Cr, Cu, Fe, Pb, Mn, Hg, Ni, Zn Toluene, benzo(a)pyrene, fluoranthene, pyrene, PCB
August 19, 2020	PGL Ditch	Cd, Cr, Co, Cu, Fe, Pb, Mn, Ni, Zn Toluene, benzo(a)pyrene, chrysene, fluoranthene, phenanthrene, pyrene, PCB
Dec 12, 2019	ECCC Shore/Dock	Al, Cu, Zn, PCB
April 26, 2021	PGL Ditch/River	Cd, Cr, Cu, Fe, Pb, Mn, Hg, Ni, Zn benzo(a)pyrene, pyrene, PCB
June 17, 2021	PGL Ditch/River	Cd, Cr, Cu, Fe, Pb, Mn, Ni, Zn, PCB

On December 10, 2021, and January 13, 2022, additional sampling by RSR's Qualified Professional, PGL Environmental Consultants (PGL), and the Ministry showed that effluent quality criteria continue to exceed BC WQG (Table 2).

On January 13, 2022, Ministry staff conducted a site inspection at RSR and observed effluent discharging into the bio-swale leading directly to the Fraser River. Sampling at the Ditch and Ditch/River sampling points generally confirmed results of samples obtained by PGL on the same date (Table 2).

[2022-03-08 IR 184118]
[2022-03-12 CoC ASL Analysis]

³ BC WQG (Aquatic life - freshwater or marine)

⁴ At the time, labelled Marsh, later re-labelled Ditch.

⁵ PCBs not reported for this sampling event

Table 2: Summary of the latest available sampling events and parameters exceeded; complete results for February monthly sampling pending (Source: RSR Monthly Reports 2022-01-10, 2022-02-10 and 2022-03-10 and Ministry analysis 2022-02-11 VA22A0648_0_COA)

<u>Date</u>	<u>Sample collector and Sample ID</u>	<u>Parameter exceeded</u> ³ bold text indicates exceedance by at least >10 times
December 10, 2021	PGL Ditch	Sb, As, Cd, Cu, Fe, Pb, Ag, Zn Toluene , benzo(a)pyrene, fluoranthene, naphthalene, pyrene BOD ⁶ , TSS ⁶ PCB Not Reported
January 13, 2022	PGL Ditch	Cd ⁷ , Cu , Fe, Pb, Hg ⁷ , Ni, Zn Toluene ⁷ , methylnaphthalene 2-, benzo(a)pyrene, fluoranthene, naphthalene, pyrene BOD, TSS PCB
February 22, 2022	PGL Ditch	Cd, Cu, Pb, Hg, Ni, Zn Pyrene, toluene BOD, TSS PCB
December 10, 2021	PGL Ditch/River	Sb, As, Cd, Cu, Fe, Pb, Hg, Zn Toluene , Acridine, benz(a)anthracene, benzo(a)pyrene , fluoranthene, phenanthrene, pyrene BOD, TSS PCB Not Reported
January 13, 2022	PGL Ditch/River	Cd, Cu, Fe, Pb, Hg ⁷ , Ni, Zn Toluene , methylnaphthalene 2-, benzo(a)pyrene, fluoranthene, naphthalene, pyrene BOD, TSS PCB
February 28, 2022	RSR Ditch/River	Cd, Cu, Pb, Zn BOD, TSS PCB

On March 8, 2022, the Ministry issued Inspection Report 184118 which determined that RSR was out of compliance with EMA section 6(2). The Ministry once again directed RSR to “*cease unauthorized discharges to the environment [and] obtain a waste discharge authorization under the Environmental Management Act*”.

[2022-03-08 IR 184118]

On March 10, 2022, RSR informed the Ministry that they “*commissioned a mobile storm water treatment plant [which has] the function to filter all storm water collected form the site*”. RSR further advised that “*discharges from the treatment plant by-passed the bios wale/ditch [bioswale] and began to be discharged to the Fraser River*”.

[2022-03-10 Pollution Prevention Order – Richmond Steel Recycling Ltd., Monthly Report]

Despite being repeatedly advised to ‘*cease unauthorized discharges*’, RSR continues to discharge effluent to the ditch and into the Fraser River. Regular monitoring of RSR effluent discharge from 2020 to present indicates that the effluent entering Fraser River exceeds BC WQG, in some cases, by multiple orders of magnitude, thereby “*substantially altering or impairing the usefulness of the environment*”.

⁶ BC Hazardous Waste criteria

⁷ Footnoted parameters are results from the samples obtained by the Ministry.

Based on this information, I am satisfied on reasonable grounds that the substance is causing pollution.

ORDER

Pursuant to Section 83 of EMA, RSR is hereby ordered to comply with the required actions listed in the table below and to provide information to the director indicating the completion of each action.

Item	Required Action	Required by midnight on:
1.	Cease All Waste Discharges to the Environment: Immediately upon receipt of this order cease all waste discharges to the environment.	
2.	Submit to the Director a Discharge Cessation Report (DCR) certified by a Qualified Professional (QP) and including the: <ol style="list-style-type: none"> Date the discharge ceased, Steps taken by RSR to cease discharge, Steps taken by RSR to ensure and document continuing compliance with Item 1, Documentary evidence such as, but not limited to, QP reports and assessments, laboratory analysis, photographs, inspection-of-works logs, SOP amendments, etc., to substantiate compliance with Items 1. 	14 days of receipt of this Order
3.	For effluent* and each Related Waste Stream**, the following must be recorded: <ol style="list-style-type: none"> Effluent or Related Waste Stream type/name/physical state, Date and quantity generated at, stored on, and consigned, removed, or disposed of from the Facility, Storage locations(s) and maximum storage capacity at each location Laboratory analysis for parameters listed in Appendix B, for effluent and each Related Waste Stream generated at, stored on, and consigned, removed, or disposed of from the Facility, Moving documents, including waybills, manifests, bill-of-lading, for effluent or related waste streams consigned, removed, or disposed of from the Facility, etc. <p>*effluent has the same meaning as in EMA and includes discharges from the water treatment system, pipes or other mitigative works. **Related Waste Stream means solids/sludges/slurries/liquids generated at or removed from on-site infrastructure or mitigative works.</p>	

Item	Required Action	Required by midnight on:						
4.	<p>Effluent monitoring at the DITCH/RIVER sampling location and at any other location that may encounter an effluent or related waste stream discharge:</p> <p>a) Implement the following monitoring programme:</p> <table border="1"> <thead> <tr> <th>Sampling Locations*</th><th>Sampling Parameters</th><th>Sampling Frequency</th></tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> Ditch/River </td><td> <ul style="list-style-type: none"> as detailed in Order Appendix C (attached) and for which there are Approved or Working BC WQG, except PCBs. For PCBs, sampling parameters include PCB sum of total and all Arochlor and PCB congeners listed in Order Appendix C. </td><td> <ul style="list-style-type: none"> Monthly***, starting no later than April 15, 2022, and During or Immediately after significant rain events** </td></tr> </tbody> </table> <p>* Sampling Location as identified on RSR WCPv3, October 2021 Figure 2 and attached as Order Appendix A. **Immediately following significant rain events: -significant rain event is defined as a period of precipitation which meets or exceeds the intensity of 25 mm in 24 hrs as reported by Environment Canada at Vancouver Intl A station and -during or immediately following means within 12 hours of EC recording precipitation equal to or in excess of 25 mm in 24 hrs. (NOTE: EC's rainfall data can be determined on a daily or hourly basis, as needed). ***a QP-certified daily record of visible flow at DITCH/RIVER sampling point must be submitted for any missed monthly sampling due to a lack of flow at this sampling point.</p>	Sampling Locations*	Sampling Parameters	Sampling Frequency	<ul style="list-style-type: none"> Ditch/River 	<ul style="list-style-type: none"> as detailed in Order Appendix C (attached) and for which there are Approved or Working BC WQG, except PCBs. For PCBs, sampling parameters include PCB sum of total and all Arochlor and PCB congeners listed in Order Appendix C. 	<ul style="list-style-type: none"> Monthly***, starting no later than April 15, 2022, and During or Immediately after significant rain events** 	Monthly, starting on May 10, 2022
Sampling Locations*	Sampling Parameters	Sampling Frequency						
<ul style="list-style-type: none"> Ditch/River 	<ul style="list-style-type: none"> as detailed in Order Appendix C (attached) and for which there are Approved or Working BC WQG, except PCBs. For PCBs, sampling parameters include PCB sum of total and all Arochlor and PCB congeners listed in Order Appendix C. 	<ul style="list-style-type: none"> Monthly***, starting no later than April 15, 2022, and During or Immediately after significant rain events** 						
5.	<p>Reporting: Monthly Compliance Report (CR), including:</p> <p>By the last day of each month, RSR must submit a Compliance Report with the requirements imposed by this Order.</p> <p>This report must be developed and certified by an independent, third-party QP, and include, for the previous month:</p> <ol style="list-style-type: none"> a substantiated assessment of compliance with each requirement of this Order, a summary of activities completed in achieving or maintaining compliance with requirements in Items 1, 2 3 and 4 of this Order, all records for Items 2, 3 and 4, including raw and summary laboratory results, their interpretations and comparison with the BC WQG and the BC <i>Hazardous Waste Regulation</i> Schedule 1.2, Column II. pertinent photographs, drawings, maps, inspection of works logs, waybills and manifests, and other documentation, and summary of daily precipitation as recorded at Vancouver Intl A station. 	Monthly, on the last day of every month, starting on May 31, 2022						

Item	Required Action	Required by midnight on:
	This requirement will remain in place until this Order is cancelled by the Director.	
6.	Qualified Professional Certifications: The QP(s) performing any of the following in response to this Order: performing work, authoring or certifying reports, and/or providing opinions must complete and submit the attached Declaration of Competency and Conflict of Interest Disclosure Statement forms.	First submission

For the purposes of this Order, the following definition applies:

"Qualified Professional" means a professional engineer, who (a) is registered in British Columbia and in good standing with the Association of Professional Engineers and Geoscientists, acting under that professional association's code of ethics and subject to disciplinary action by that association, and (b) through suitable education, experience, accreditation and knowledge, may be reasonably relied on to provide advice within his or her area of expertise as it relates to this order, or (c) is approved by the director.

This order will remain in effect until instructed otherwise in writing by the Director.

DUTY TO COMPLY

The requirements above must be completed on or before the associated "Required By" date. Failure to comply with the requirements of this order is a contravention of the *Environmental Management Act* [SBC 2003, c.53] and may result in legal action. I direct your attention to Section 120(10) of the *Environmental Management Act*, which reads:

"(10) A person who contravenes an order...that is given, made or imposed under this Act by a ...director...commits an offence and is liable on conviction to a fine not exceeding \$300 000 or imprisonment for not more than 6 months, or both."

Failure to comply with the requirements of this order may also result in an administrative penalty under the Administrative Penalties Regulation (*Environmental Management Act*) [B.C. Reg 133/2014] (Regulation). I direct your attention to Section 12(4) of the Regulation, which reads:

"(4) A person who fails to comply with an order under the [Environmental Management] Act is liable to an administrative penalty not exceeding \$40 000."

RIGHT TO APPEAL

This decision may be appealed to the Environmental Appeal Board in accordance with Part 8 of the *Environmental Management Act*. An appeal must be delivered within 30 days from the date notice of this order is given. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

NOTIFICATION OF PUBLICATION

Please be advised that this order may be published on the ministry website in 7 days. The recipient of this order is also notified that the Province intends to publish on the ministry website the entirety of any regulatory document provided that:

- a) The Province will provide written notice to the Responsible Person of its intent to publish the Regulatory Documents at least fourteen [14] days prior to publication,
- b) The Province will not publish any information that could not be disclosed if it were subject to a request under section 5 of the *Freedom of Information and Protection of Privacy Act*, R.S.B.C. 1996, c. 165 as amended from time to time.

Please be advised that this order may also be published in the ministry's Quarterly Environmental Enforcement Summary and Natural Resource Compliance and Enforcement Database.

MINISTRY CONTACT

If you have any questions, please contact the undersigned at Dan.Bings@gov.bc.ca or 250-302-3588, or Environmental Protection Officer Oana Enick at Oana.Enick@gov.bc.ca or 236-468-2231.

Yours truly,



Daniel P. Bings
for Director, *Environmental Management Act*
Compliance Operations Manager

Attachments:

2022-04-28 PAO111135 Appendices

CC Recipients:

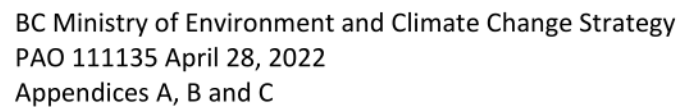
Catherine Allard
South Authorizations Officer, South Regional Office
Ministry of Forests, Lands & Natural Resources Operations and Rural Development
Suite 200 – 10428 153 Street, Surrey, BC V3R 1E1
Catherine.Allard@gov.bc.ca

Gregory Lee
Inspector and Fishery Officer, Environmental Enforcement Directorate
Enforcement Branch, Environment and Climate Change Canada
Pacific and Yukon Region
201-401 Burrard Street, Vancouver, BC, V6C 3S5
Gregory.lee3@canada.ca

Warren Mills
Environmental Coordinator
6911 No. 3 Road, Richmond, BC V6Y 2C1
Wmills@richmond.ca

Sajid Barlas, P. Eng.
Section Head, Authorizations South
Regional Operations Branch
Ministry of Environment and Climate Change Strategy
Sajid.Barlas@gov.bc.ca

Appendix A: Sampling Locations (Source: Waste Characterization Plan, October 2021)



Appendix B:

Sampling Parameters for Pollution Abatement Order 111135 Item 3:

benzene	toluene	ethylbenzene
xylene	acridine	benzo(a)pyrene
fluoranthene	pyrene	
Total and Dissolved Metals		
aluminum	antimony	arsenic
barium	beryllium	boron
cadmium	chromium, hexavalent	chromium, trivalent
cobalt	copper	iron
lead	lithium	manganese
mercury	molybdenum	nickel
selenium	silver	strontium
thallium	tin	titanium
tungsten	vanadium	zinc
PCB Arochlors		
aro chlor 1016	aro chlor 1221	aro chlor 1232
aro chlor 1242	aro chlor 1248	aro chlor 1254
aro chlor 1260	aro chlor 1262	aro chlor 1268
PCBs (sum of total)		
pH		
BOD	TSS	Hardness and Conductivity

Appendix C:

Sampling Parameters for Pollution Abatement Order 111135 Item 4:

Petroleum Hydrocarbons (PHCs)

LEPH	HEPH	VHw6-10
VPH	benzene	toluene
ethylbenzene	xylene	MTBE

Polycyclic Aromatic Hydrocarbons (PAHs)

acridine	anthracene	benz(a)anthracene
benzo(a)pyrene	benzo(b+j)fluoranthene	benzo(ghi)perylene
benzo(k)fluoranthene	chrysene	dibenz(a,h)anthracene
fluoranthene	fluorene	indeno(1,2,3-cd)pyrene
methylnaphthalene, 1-	methylnaphthalene, 2-	naphthalene
phenanthrene	pyrene	quinoline

Metals

aluminum	antimony	arsenic
barium	beryllium	boron
cadmium	chromium, hexavalent	chromium, trivalent

BC Ministry of Environment and Climate Change Strategy

PAO 111135 April 28, 2022

Appendices A, B and C

cobalt	copper	iron
lead	lithium	manganese
mercury	molybdenum	nickel
selenium	silver	strontium
thallium	tin	titanium
tungsten	vanadium	zinc

Polychlorinated biphenyls (PCBs)

arochlor 1016	arochlor 1221	arochlor 1232
arochlor 1242	arochlor 1248	arochlor 1254
arochlor 1260	arochlor 1262	arochlor 1268
decachlorobiphenyl	heptachlorobiphenyl, 2,3,3,4,4,5,5- (PCB 189)	hexachlorobiphenyl, 2,3,3,4,4,5- (PCB 156)
hexachlorobiphenyl, 2,3,3,4,4,5- (PCB 157)	hexachlorobiphenyl, 2,3,4,4,5,5- (PCB 167)	hexachlorobiphenyl, 3,3,4,4,5,5- (PCB 169)
PCB 080	PCB 118	pentachlorobiphenyl, 2,3,3,4,4- (PCB 105)
pentachlorobiphenyl, 2,3,4,4,5- (PCB 114)	pentachlorobiphenyl, 2,3,4,4,5- (PCB 123)	pentachlorobiphenyl, 3,3,4,4,5- (PCB 126)
tetrachlorobiphenyl, 3,3,4,4- (PCB 77)	tetrachlorobiphenyl, 3,4,4,5- (PCB 81)	

Glycols

ethylene glycol	propylene glycol
-----------------	------------------

Physical Parameters

total suspended solids (TSS)	pH
hardness	conductivity
biological oxygen demand (BOD)	

Toxicity

daphnia toxicity (48 hrs LC ₅₀)	trout toxicity (96 hrs LC ₅₀)** **Immediately following significant rain events as defined in the Order
---	--

From: Steven Kynoch <SKynoch@richmondsteel.ca>
Sent: May 5, 2022 6:03 AM
To: Environmental Compliance ENV:EX; Harbinder Dhillon
Cc: Bings, Dan P ENV:EX; Enick, Oana V ENV:EX; Allard, Catherine FLNR:EX; Gregory.lee3@canada.ca; WMills@richmond.ca; Barlas, Sajid A ENV:EX
Subject: RE: 2022-04-28 PAO 111135

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We acknowledge receipt of your e mail.

Steven Kynoch
EHS Regional Manager
skynoch@richmondsteel.ca
Mobile. 604-833-9750 | Office. 604-394-2039
11760 Mitchell Rd, Richmond, BC, V6V 1V8

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[Richmond Steel Recycling](#)

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From: Environmental Compliance ENV:EX <environmentalcompliance@gov.bc.ca>
Sent: May 4, 2022 8:26 AM
To: Steven Kynoch <skynoch@richmondsteel.ca>; Harbinder Dhillon <HDhillon@richmondsteel.ca>
Cc: Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>; Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>; Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>; Gregory.lee3@canada.ca; WMills@richmond.ca; Barlas, Sajid A ENV:EX <Sajid.Barlas@gov.bc.ca>
Subject: RE: 2022-04-28 PAO 111135
Importance: High

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Gina Tamm, BBA | Compliance Coordinator

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on the TELUS Mobility Network or report the incident [online](#)

To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

From: Environmental Compliance ENV:EX

Sent: April 28, 2022 2:17 PM

To: 'skynoch@richmondsteel.ca' <skynoch@richmondsteel.ca>; 'Harbinder Dhillon' <HDhillon@richmondsteel.ca>

Cc: Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>; Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>; Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>; 'Gregory.lee3@canada.ca' <Gregory.lee3@canada.ca>; 'WMills@richmond.ca' <WMills@richmond.ca>; Barlas, Sajid A ENV:EX <Sajid.Barlas@gov.bc.ca>

Subject: 2022-04-28 PAO 111135

Importance: High

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Good Afternoon,

On behalf of Daniel P. Bings, Compliance Operations Manager, Regional Operations Branch, Environmental Protection Division, with the Ministry of Environment and Climate Change Strategy, please see attached on the above-noted subject.

PAO111135

Regards,



Gina Tamm, BBA | Compliance Coordinator

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on the TELUS Mobility Network or report the incident [online](#)

To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

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Pollution Abatement Order #111135 dated April 28, 2022

From: Karl Gustafson <Karl.Gustafson@mcmillan.ca>
To: Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>
Cc: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>, Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>, Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>, Barlas, Sajid A ENV:EX <Sajid.Barlas@gov.bc.ca>, Wmills@richmond.ca, Harbinder Dhillon <HDhillon@richmondsteel.ca>, Steven Kynoch <SKynoch@richmondsteel.ca>
Sent: May 10, 2022 4:28:06 PM PDT
Attachments: 38870416_1.pdf, image001.gif

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Dear Mr. Bings;

Please see the attached letter addressed to your attention in relation to the Pollution Abatement Order referenced above.

Regards,

Karl

mcmillan

Karl E Gustafson, Q.C.

Counsel

d 604.691.7427

karl.gustafson@mcmillan.ca

Assistant: Karen Lam | 236.826.3051 | karen.lam@mcmillan.ca

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Richmond Steel Quick call.msg.ics

Sent: May 11, 2022 6:20:20 AM PDT

Received: May 11, 2022 6:19:00 AM PDT

File name: Richmond Steel Quick call.msg.ics

File extension: ics

Priority: High (1)

Address: (UTC-08:00) Pacific Time (US & Canada)

Calendar Item Type: REQUEST

Hello all:

Our meetings have expired a couple of months ago, and Greg is moving to other projects (tomorrow!!), so I'd like to have a quick meeting today to catch up and re-start our monthly meetings.

Thanks, Oana.

s.15

FW: Pollution Abatement Order #111135 dated April 28, 2022

From: Enick, Oana V ENV:EX
To: Mills, Warren <WMills@richmond.ca>
Sent: May 11, 2022 2:06:09 PM PDT
Attachments: image001.gif, image003.jpg, image004.jpg, image005.jpg, image002.png, 38870416_1.pdf
Here you go



Oana Enick, MET, RPBio | Environmental Protection Officer

Compliance and Environmental Enforcement | BC Ministry of Environment and Climate Change Strategy
Ste. 200 – 10470 – 152nd Street. | Surrey, BC | V3R 1Q7 | Tel: 236-468-2231

To report an act of pollution call the RAPP (Report All Poachers and Polluters) line at 1-877-952-7277 or #7277 on TELUS Mobility or report the incident [online](#)

@ComplianceBC To report a spill call the Provincial Emergency Program at 1-800-663-3456

More information about Environmental Compliance and how it is assessed can be found [here](#).

From: Karl Gustafson <Karl.Gustafson@mcmillan.ca>
Sent: May 10, 2022 4:28 PM
To: Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>
Cc: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>; Lee, Gregory (ECCC) <Gregory.Lee@ec.gc.ca>; Allard, Catherine FLNR:EX <Catherine.Allard@gov.bc.ca>; Barlas, Sajid A ENV:EX <Sajid.Barlas@gov.bc.ca>; Wmills@richmond.ca; Harbinder Dhillon <HDhillon@richmondsteel.ca>; Steven Kynoch <SKynoch@richmondsteel.ca>
Subject: Pollution Abatement Order #111135 dated April 28, 2022

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Dear Mr. Bings;

Please see the attached letter addressed to your attention in relation to the Pollution Abatement Order referenced above.

Regards,

Karl

mcmillan

Karl E Gustafson, Q.C.

Counsel
d 604.691.7427
karl.gustafson@mcmillan.ca

Assistant: Karen Lam | 236.826.3051 | karen.lam@mcmillan.ca

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Reply to the Attention of: Karl Gustafson, Q.C.
Direct Line: 604.691.7427
Email Address: karl.gustafson@mcmillan.ca
Our File No.:
Date: May 10, 2022

EMAIL

Without Prejudice

Ministry of Environment and Climate Change Strategy
Compliance and Environmental Enforcement
2nd Floor, 10470 152 Street
Surrey, British Columbia
V3R 0Y3

Attention: Daniel P. Bings, Compliance Operations Manager

Dear Sirs/Mesdames;

Re: Pollution Abatement Order #111135 dated April 28, 2022 (the "Order") issued to Richmond Steel Recycling Ltd. ("RSR")

As you know, we are counsel for RSR. We write with reference to the Order.

In reviewing the Order, we have identified at least one requirement (Item #1) that RSR would not be able, as a practical matter, to comply with immediately and others for which clarification is required in order to understand whether, when and how RSR will be able to comply. While we believe RSR has grounds on which to appeal the Order on its merits (and to obtain a stay), RSR hopes to avoid the cost and delay for all concerned in an appeal hearing and to focus instead on completing the remediation and mitigative projects already underway and planned that will make it possible for RSR to comply with the Order and to consistently maintain that compliance.

To that end, we ask that the Director agree to an extension of the deadlines imposed under the Order as set out below.

For context, and in the event the Director was not aware of the following when the Order was issued, please note the following:

- Following the installation of a Stormtec water treatment plant on the site on February 14, 2022, RSR has made steady and significant improvements in treating stormwater to the point that, by the end of April, it was achieving treatment results that complied with BC WQG in all respects except for PCB removal and BOD levels.

- With respect to PCB removal and BOD levels, based on laboratory reports provided to Stormtec to inform its decisions regarding adjustments to the operation of the water treatment plant, Stormtec advised that by March 23, 2022 the water treatment plant had achieved 98.6% removal of PCBs and 23.7% reduction of BOD from influent water.
- Further adjustments to the water treatment plant are in process which, when coupled with RSR's other remedial work and pre-treatment facilities, are expected to achieve and consistently maintain full compliance with all BC WQGs parameters.
- In conjunction with the commissioning of the water treatment plant, RSR ceased to discharge storm water to the bioswale with the result that water levels in the bioswale/ditch have been substantially reduced and discharges of untreated stormwater from the ditch are either no longer in evidence or are negligible.
- A sump pump has been installed in the bioswale to recycle to the water treatment plant any stormwater that naturally accumulates in the bioswale and to prevent its migration to the ditch.
- In the coming drier summer months, and particularly with the foregoing measures in place, RSR believes that there is virtually no reasonable prospect for untreated stormwater in the bioswale/ditch to be discharged to the river.

At this time, we believe that RSR has done all it reasonably can to prevent the discharge of waste to the river. Regardless of whether those measures are sufficient, RSR intends to proceed with the additional remedial and mitigative measures already contemplated in the 'Drainage and Mitigation Plan' developed by Pottinger Gaherty Environmental Consultants Ltd. ("PGL") to ensure that it complies and maintains compliance with the requirement that there be no discharge of waste to the river. However, as RSR has previously reported, certain of the key measures (e.g. removal of impacted sediments from the bioswale/ditch, damming outflow from the ditch to ensure there is no possibility of future discharge of untreated stormwater, and installation of a detention pond to control stormwater and regulate influent to the water treatment plant) cannot proceed at this time without RSR violating current outstanding directives from the DFO and FLNRORD. Similarly, some of these measures (e.g. installation of the detention pond and covering stockpiles of ASR) also cannot proceed without approvals under City of Richmond by-laws.

With the foregoing in mind, we ask that the Director grant an extension of the deadlines in the Order on the following terms:

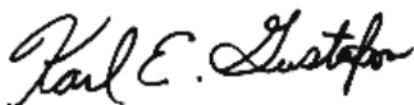
1. an extension of the first deadline with respect to Order Item #1 to July 31, 2022, or to such other date as is reasonable to allow RSR to complete the planned remedial and mitigative work in the bioswale/ditch in a manner that complies with applicable federal, provincial and municipal laws (the "**Extension Period**"), and an extension of the other deadlines in the Order to such other dates as are reasonable to allow RSR to obtain clarification of the requirements and assess and submit comments on the feasibility of compliance, and
2. the extensions being conditional upon and subject to RSR at all times during the Extension Period:
 - a. continuing to pursue an authorization from FLNRORD to carry out remedial and mitigative work in the bioswale/ditch including the installation of a dam or barrier at the end of the ditch;

- b. continuing the program of monthly sampling and analysis of the discharge from the water treatment plant in accordance with the parameters set out in the Order;
- c. sampling discharge from (i) the water treatment plant, and (ii) if there is a 'significant rain event' that results in a visible discharge of untreated stormwater from the ditch sufficient to allow sampling, sampling of that discharge within 8 business hours;
- d. recording the quantity of treated stormwater discharged on a daily basis from the water treatment plant;
- e. submitting a monthly report regarding all analytical results provided to it for water samples collected each month by the 10th day of the following month and, with respect to any analytical results not available to RSR by that date, submitting those results forthwith following receipt;
- f. including in the monthly report reasonable details of the status of RSR's applications for all authorizations, permits and approvals as required to carry out planned remedial and mitigative work pursuant to the Drainage & Mitigation Plan, including in particular, the installation of the proposed detention pond and cover for the ASR stockpile described above, and
- g. proceeding with the implementation of remediation and mitigative measures as contemplated in the Drainage & Mitigation Plan promptly upon receipt of the required legal approvals, permits and authorizations.

We also ask that you consent to requesting the Environmental Appeal Board to initiate its Facilitated Settlement process. We believe that the process will provide an opportunity to bring together representatives of your office with representatives of RSR, the DFO, FLNRORD and the City of Richmond to discuss and endeavour to resolve their respective concerns in a coordinated and cooperative way.

We ask that you please reply to this request by no later than Tuesday, May 17, 2022. In the meantime, if you wish to discuss this request or require any additional information, please do not hesitate to contact the writer.

Yours truly,



Karl Gustafson, Q.C.*

*Law Corporation

CC Recipients:

Oana Enick – Oana.Enick@gov.bc.ca

Catherine Allard – Catherine.Allard@gov.bc.ca

Gregory Lee – Gregory.lee3@canada.ca

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Sajid Barlas, P. Eng. – Sajid.Barlas@gov.bc.ca

RSR Texts

From: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
To: Enick, Oana V ENV:EX <Oana.Enick@gov.bc.ca>
Sent: June 10, 2022 5:52:35 AM PDT
Attachments: IMG_0593.JPG, IMG_0595.JPG

6:36



Greg Lee >

Wed, Jan 12, 1:15 PM

Hey: we're good to come to RSR tomorrow.

All set to go.

Sorry one sec

Hi Oana sorry I was in another call. I'm for sure going tomorrow just need to know what time to meet there. You can call me back any time now.

See you at 11am tomorrow
here:

Starbucks

12571 Bridgeport Rd #104,
Richmond, BC V6V 1J4
(604) 279-9328

Tap to Load Preview



Text Message



7:45



WM



Warren >

Any idea where the orders are

Any idea where the cracks are
publicly found?

Thu, Mar 31, 8:35 AM

Quick call today?

Just curious on RS

Wed, Apr 13, 6:20 AM

s.22

[REDACTED] but I forgot to
email you and let you know
that the lady who's finding
info for your report to council,
asked for a few more days.
She said she'll have
something by Monday - April
18.

Wed, Apr 13, 7:43 AM

Thanks!!

That is perfect



iMessage



Sent from my iPhone

6:36



G

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