

2021

VEHICLE DISMANTLING INDUSTRY AUDIT REPORT

ENVIRONMENTAL MANAGEMENT ACT



Executive Summary

In 2020 and 2021, the Compliance and Environmental Enforcement Branch (CEEB) of the BC Ministry of Environment and Climate Change Strategy (ENV) conducted a sector-wide compliance audit of the vehicle dismantling and recycling industry within the province of BC. The vehicle dismantling and recycling industry is a prescribed industry under the Environmental Management Act (EMA) Waste Discharge Regulation (WDR) and was not previously audited by ENV. The purpose of the audit was to:

- Determine the level of compliance with the Vehicle Dismantling and Recycling Industry Environmental Planning Regulation (VDR), and selected sections of the Hazardous Waste Regulation (HWR);
- Determine if the VDR and HWR contain foundation environmental protection provisions and enforceable clauses;
- Improve rates of compliance within the sector by identifying opportunities for compliance promotion initiatives; and
- Provide recommendations to improve VDR enforceability and environmental protection.

A total of 187 vehicle dismantling facilities registered under the VDR were inspected. Of those 187 facilities, 59 were no longer dismantling; therefore, a total of 128 actively operating facilities were included in the audit data analysis. Compliance determinations were as follows:

- The rate of compliance was 29%.
- 71% of inspections found a least one non-compliance, resulting in an Advisory (70%) or Warning (1%) of non-compliance.
- The VDR Audit verified compliance with selected VDR clauses for a total of 1699 individual compliance determinations (Table 3).

A total of 124 facilities were inspected to verify compliance with the HWR. The compliance determinations were as follows:

- The overall rate of compliance was 7%.
- 93% were non-compliant with at least one of the selected HWR clauses, which resulted in an Advisory (86%) or Warning (7%) of non-compliance.

The Automotive Recyclers Environmental Association (AREA), whose purpose is to develop and implement an Environmental Certification Program for the automotive recycling industry, was in compliance with most of the VDR requirements with a few exceptions.

- The Environmental Management Plan (EMP) did not describe how each waste listed in the VDR will be stored, treated, recycled, or disposed of in compliance with EMA and applicable regulations.
- The report (required by Section 5 of the VDR) failed to include elements required by sections 5 (2)(c), 5 (2)(d)(i), 5 (2)(d)(ii), and 5 (2)(d)(iii) of the VDR.
- The inspection of AREA resulted in a Level 1 for the environmental impact, with a Category B for the likelihood of compliance. The inspection response was an Advisory of non-compliance.

The audit found that the highest levels of non-compliance were with record keeping and waste storage requirements. These are the requirements that involve:

- Keeping reports provided by AREA,
- Retaining the correct copy of any waste shipping manifests,
- Keeping hazardous waste storage containers closed when not in use, and
- Labeling hazardous waste containers with the name of the waste they contain.

Despite the low overall compliance rate, across all inspections conducted, non-compliances were determined to have, at most, a minor or temporary impact or threat to the environment or human health and safety.

- 95% of VDR inspections had a non-compliance decision matrix level of “0” or “1”, and
- 84% of HWR inspections had a non-compliance decision matrix level of “0” or “1”.

From the audit results, the CEEB is recommending that:

- o The VDR includes a requirement for dismantlers to follow the EMP prepared for their facility;
- o Promote proper practices for the storage and labeling of hazardous waste;
- o Promote learning opportunities for waste manifest record keeping;
- o Promote learning opportunities for what reports are required to be kept at the facility;
- o Require associations to provide their audit cycle information so that compliance can be verified with the inspection cycle for the association;
- o Clarify and improve upon the de-registration processes for facilities that are no longer operating to allow ENV to maintain an up-to-date registrant database; and
- o Improve communication between the associations, ENV, and facilities so that requirements for the storage of hazardous waste in the HWR are included in the EMP.

List of Abbreviations Used

Acronym	Definition
AMS	Authorization Management System
AREA	Automotive Recyclers Environmental Association
CEEB	Compliance and Environmental Enforcement Branch
EMA	<i>Environmental Management Act</i>
EMP	Environmental Management Plan
ENV	Ministry of Environment and Climate Change Strategy
HWR	Hazardous Waste Regulation
NA	Not Applicable
ND	Not Determined
NRCED	Natural Resource Compliance and Enforcement Database
NRIS	Natural Resource Inspection System
VDR	Vehicle Dismantling and Recycling Industry Environmental Planning Regulation
VDR Audit	Vehicle Dismantling Industry Audit
WDR	Waste Discharge Regulation

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Introduction

Purpose of this Report

This report presents the findings of a sector-wide compliance audit conducted between May 1, 2020, and December 31, 2021, of vehicle dismantling industry within the province of British Columbia (BC). The purpose of the audit was to determine the vehicle dismantling industry's level of compliance with the Environmental Management Act (EMA), administered by the Ministry of Environment and Climate Change Strategy (ENV).

The objectives of the audit were to:

- Complete file review inspections for 170 active Vehicle Dismantling and Recycling Industry Environmental Planning Regulation (VDR) registrations (60 percent of active registrations) to determine compliance rates with VDR requirements.
- Complete site inspections of 170 active VDR registrations to determine compliance with selected sections of the Hazardous Waste Regulation (HWR).
- Determine if the VDR and HWR contain foundational environmental protection provisions and enforceable clauses.
- Improve compliance rates within the sector by identifying opportunities for compliance promotion initiatives.
- Provide recommendations to improve VDR enforceability and environmental protection, if required, and
- Produce an audit report on the compliance status of the vehicle dismantling and recycling industry.

The findings of the VDR Audit will serve to identify the rates of compliance within the vehicle dismantling and recycling industry, guide strategies to improve compliance with legislative requirements, communicate them to sector stakeholders, the public and other government agencies.

Overview of the Industry Sector

Selection

Industry sectors targeted by the ENV's annual audit program are selected based on their inclusion in the Waste Discharge Regulation (WDR), as well as existing policy and direction such as Environmental Protection Division's Inspection Policy and the 2020 BC Service Plan.

The vehicle dismantling and recycling industry was selected for audit because it is listed as a prescribed industry in WDR and had several authorizations that had not been inspected in the last five years.

Facilities were selected for inspection as part of this audit based on the following criteria:

- 1) Registrations that received a Warning during the last inspection were selected (4 registrations); and,
- 2) Registrations which have not been inspected in the last five years were selected at random using randomization functions in Excel (166 registrations).

Inspections included compliance verification with the VDR, the HWR, and, if applicable, general provisions of EMA to not cause pollution.

Additionally, it is beneficial to inspect entire industries over a short period of time to ensure fairness for the businesses and inform the industry as a whole on improvements that could be made to achieve compliance.

Description

The vehicle dismantling industry in BC provides over 1,100 full time jobs and contributes to \$82,000,000 annually in GDP¹. Recycled parts offer consumers savings and reduces the provincial carbon footprint.

Wastes managed as part of the vehicle dismantling and recycling process include hydrocarbons, antifreeze and other liquids, metals and other solid wastes, effluent from pressure washing, used solvents and other hazardous wastes including mercury switches and lead-acid batteries.

As of May 2020, there were 283 facilities in the province registered under the VDR. Of those, 60 percent (170 out of 283 registrations) were selected for audit.

During the VDR Audit, additional locations were added, in an effort to off-set the number of sites that were found to be no longer dismantling, as a result a total of 187 vehicle dismantling facilities registered under the VDR were inspected. Of those 187 vehicles dismantling facilities, 59 of them were no longer dismantling more than 5 wet vehicles per calendar year; therefore, a total of 128 actively operating facilities were included in the audit. Of the 128 facilities, 112 were members of an association and 16 were non-association facilities.

In addition to dismantlers, the VDR also has requirements for vehicle dismantling associations. An association under the VDR means “an association of two or more facilities, which association includes in its purposes:

- (a) preparing a plan for the purposes of this regulation, and
- (b) monitoring and reporting on compliance with the plan;”

In BC, there is one association representing vehicle dismantlers, the Automotive Recyclers Environmental Association (AREA). AREA was formed in 1997 and is a not-for-profit organization that develops and implements an Environmental Certification Program for the vehicle dismantling industry. More information regarding AREA can be found at the following weblink <https://area-bc.ca/>

AREA was included as part of this sector wide audit and the results are presented in this audit report.

The EMP is referred to as "plan" in the VDR and means an environmental management plan as required under section 2 (1) of the VDR. The EMP describes how wastes at the facility are managed, reduced or prevented. Section 2 of the VDR describes the requirements for an EMP. One of the EMP's functions is to describe how each of the wastes produced by draining and dismantling vehicles are to be removed, stored, treated, or disposed of in compliance with the EMA.

¹ Automotive Recyclers of Canada, dated July 13, 2015, An Analysis of the Automotive Dismantling Industry in British Columbia, accessed at <https://autorecyclers.ca/2015/an-analysis-of-the-automotive-dismantling-industry-in-british-columbia-current-trends-impacting-the-future-sustainability-of-the-industry/>

Regulatory Oversight

ENV is responsible for the protection, management and conservation of BC's water, land, air and living resources. To fulfil its mandate, ENV establishes and administers a broad suite of regulatory requirements. Table 1 below presents an overview of the legislation that is relevant to this audit.

Table 1 – Regulatory Context

Environmental Management Act (EMA)	The Environmental Management Act (EMA) is the key statute governing environmental protection in BC. EMA regulates industrial and municipal waste discharges, pollution, air quality, hazardous waste, and contaminated site remediation. It provides powers and authorities for ENV staff to verify compliance, to prevent and correct detrimental environmental impacts, and to take enforcement action and respond to environmental emergencies. Under this legislation, the introduction of waste into the environment from identified “prescribed” industries, trades, businesses, operations, and activities requires authorization from ENV.
Waste Discharge Regulation (WDR)	The Waste Discharge Regulation (WDR) defines what industries, activities and operations require authorizations to discharge or release waste to the air, water, and land under EMA. Vehicle Dismantling and Recycling Industry is a prescribed industry, trade or business listed under Schedule 2 of the WDR and included in section 6(2) of EMA. Therefore, vehicle dismantlers require an authorization. Hazardous Waste Management is an activity/operation listed in Schedule 1 of the WDR and included in section 6(3) of EMA.
Vehicle Dismantling and Recycling Industry Environmental Planning Regulation (VDR)	An entity which operates a vehicle dismantling and recycling facility in the province of BC and dismantles more than 5 wet vehicles ² in a calendar year is required to register under the Vehicle Dismantling and Recycling Industry Environmental Planning Regulation (VDR). The VDR also regulates an association which provides an environmental management plan (EMP) for two or more facilities.
Hazardous Waste Regulation (HWR)	Hazardous Waste Regulation (HWR) addresses the proper handling and disposal of hazardous waste. The definition of hazardous waste is provided in Appendix I. All facilities are required to manage hazardous wastes in accordance with the HWR. Facilities who produce or store a quantity of hazardous waste(s) greater than the limits set in Schedule 6 of the HWR must register with ENV as a hazardous waste generator (BCG).

Requirements

Inspections consisted of evaluating whether the vehicle dismantler and association were compliant with the following clauses (Table 2). The applicability of the clauses was based on if the facility was an association, a member of an association, or a non-association facility.

² “wet vehicle” is defined in the VDR as: a motor vehicle that is no longer used for transportation and has not been reduced to a steel hulk or to a steel hulk with on the plastic, fabric or foam components still attached.

Table 2 – Sections of the VDR and the HWR evaluated for compliance

	Vehicle Dismantler		Associations
	Association Member	Non-Association Facility	
Sections of the VDR evaluated	2(1)	2(1)	2(3)
	3(1)	2(3)	2(5)
	3(3)	2(4)	5(1)(b)
	7(1)	3(1)	5(2)
	7(2)	3(3)	5(3)
		4(1)	5(4)
		4(2)	
		6	
		7(1)	
		7(2)	

	Vehicle Dismantler
Sections of the HWR evaluated	43(1)
	46(5)
	46(9)
	50(3)(a)
	50(3)(b)
	50(3)(c)
	50(8)

Key Environmental and Human Health Considerations

Environmental and human health concerns associated with the vehicle dismantling and recycling industry are the improper handling of hazardous wastes and the quantity and quality of effluent or storm water discharges from facilities.

The improper handling of hazardous waste can lead to a discharge of waste oil, antifreeze, solvents, ozone depleting substances, and fluids from lead-acid batteries to the environment.



Photo 1 - Hazardous waste stored at a vehicle dismantling facility

Methods

All the inspections were conducted as a combination of office reviews and on-site inspections.

Office Review Inspections

ENV reviewed records required by the selected VDR and HWR clauses for each facility. The office review included authorization information within ENV's Authorization Management System (AMS) database and any other documents, reports, and/or data submissions required under their authorizations. The office review may have included communication with the registrant to ask questions as needed to gather additional information necessary to complete the inspections.

On-site Inspections

ENV conducted on-site inspections of all the facilities inspected in the VDR Audit. During each on-site inspection, ENV conducted a walkthrough of the site to verify facility and operational details and reviewed any monitoring records and maintenance logs. Site personnel were questioned on the facility's history and operational details as necessary to verify regulatory compliance. Photographs of the facilities and operations were taken as necessary.

Sites Inspected

A total of 128 actively operating facilities were included in the audit (Figure 1). AREA was also inspected to verify compliance with the VDR requirements for associations as defined under the VDR.



Figure 1 – Location of the vehicle dismantling facilities included in this audit.

The vehicle dismantling facilities included in their VDR Audit, their respective inspection record numbers, VDR Registration numbers, and their locations are listed in Appendix II.

Compliance Determinations and Responses

Inspections consisted of evaluating whether the registrant was compliant with the selected regulation clause (Table 2). Compliance findings for each assessed clause were one of four outcomes:

In	ENV determined that the registrant is in compliance with the regulatory requirement at the time of the inspection.
Out	ENV determined that the registrant is out of compliance with the regulatory requirement at the time of the inspection.
Not Determined	There was not enough information for ENV to determine whether the registrant is in compliance with the regulatory requirement at the time of the inspection.
Not Applicable	Compliance with the regulatory requirement did not apply to the registrant at the time of the inspection.

ENV determined the appropriate administrative response based on the compliance verification findings of the inspection using the non-compliance decision matrix contained in ENV's Compliance and Enforcement Policy and Procedure³. This matrix uses the levels of impact on environmental or human health or safety, and categories, for the likelihood of compliance to determine available enforcement responses. Levels range from a "1" where non-compliances are unlikely to have an impact or where minor administrative non-compliances are observed to a "5" where non-compliances have a severe impact on the environment or human health. Categories range from "A" for a high likelihood of ongoing compliance to "E" for obstruction of a ministry official or refusing to provide required information. Both the level and category determine which administrative response will be issued as a result of the inspection. A detailed description of some common administrative responses is included below:

Notice	A notice of compliance is a written confirmation that ENV determined that the registrant is in compliance with all of the regulatory requirements evaluated at the time of the inspection
Advisory	An advisory notifies the non-compliant party in writing that they are not in compliance with a specific regulatory requirement and often recommends a course of action that is expected to achieve compliance. An advisory is often the first enforcement response taken in cases of minor to moderate non-compliance when there is a high likelihood of achieving compliance.
Warning	Similar to an advisory, a warning notifies the non-compliant party in writing that they are not in compliance with a specific regulatory requirement; however, the warning differs from an advisory in that it warns of the possibility of an escalating response should non-compliance continue. Warnings are generally used when it is determined that an exchange of information alone would not be sufficient in achieving compliance.
Administrative Monetary Penalty	An administrative monetary penalty is a financial penalty up to \$40,000 imposed by a ministry Statutory Decision Maker on a non-compliant party in accordance with legislation.

The response of a notice of compliance is only issued if none of the assessed sections are found to be out of compliance. If a single non-compliance was found during an inspection, the minimum compliance response is an advisory, regardless of how many sections were compliant or how minor the non-compliance.

All administrative responses to non-compliances serve as a formal record of the alleged non-compliance and form an important element of the compliance history of the party in question. Other responses such as orders, administrative sanctions, etc., within ENV's enforcement toolkit can be found in ENV's [Compliance and Enforcement Policy and Procedure](#).

The results of each inspection, along with the administrative responses, were summarized in an inspection record using ENV's Natural Resource Inspection System (NRIS), a copy of which was provided to the registrant and published to ENV's natural resource compliance enforcement database ([NRCED](#)).

Data Analysis

ENV compiled the results of 128 inspections for the actively operating vehicle dismantling facilities included in the VDR Audit to determine overall compliance rates. Findings for each VDR clause were assessed to obtain data on sector performance in different clause categories such as compliance with the requirements of an environmental management plan (EMP), maintaining the EMP, notifications to ENV, record keeping, and registration.

Findings for each HWR clause were assessed to obtain data on sector performance in different clause categories such as compliance with the BCG requirement, waste manifests, and waste storage. Additional sub-categories were created for the HWR data analysis which included waste container labels, waste containers kept closed, containers secure under normal conditions, containers not handled in a way that would cause them to rupture or leak, manifest filled out correctly, and the applicable copy of the waste manifest was kept at the Facility.

The tallied clause category data was then further analyzed to answer the following question: What percent of facilities were in compliance with each category of requirement?

³ B.C. Ministry of Environment and Climate Change Strategy. January 2019. Compliance and Enforcement Policy and Procedure, Version 4. Accessed at < https://www2.gov.bc.ca/assets/gov/environment/research-monitoring-and-reporting/reporting/reporting-documents/environmental-enforcement-docs/env_ce_policy_and_procedure_2019.pdf >.

Results

Vehicle Dismantling and Recycling Industry Environmental Planning Regulation

Inspection Outcomes

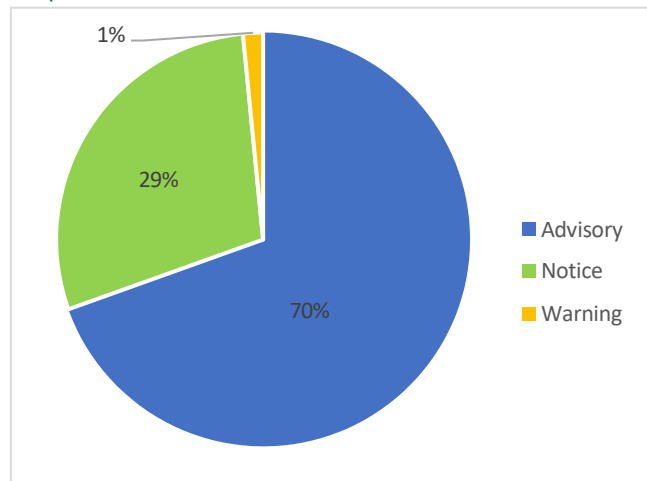


Figure 2 – Vehicle Dismantling Regulation Inspection Response

A total of 59 inspections resulted in a recommendation to notify a director of the cessation of operations. These recommendations were issued as 10 Notices and 49 Advisories, and as these inspections did not include compliance verification with all of the selected clauses, they were removed from the results below, unless specifically mentioned.

The rate of compliance with the VDR was 29%, and Notices of compliance were issued (Figure 2).

Advisories made up 70% of the reports issued. They were issued for non-compliances with failing to keep records, failing to produce a

report (as a non-association facility), failing to notify a director when required, and failing to have and maintain an EMP. The Advisories were issued as a result of non-compliances that were either administrative deficiencies or other deficiencies considered to pose, at most, minor temporary impacts to environment, human health, or safety. These corresponded to an impact rating of either a Level 1 or 2 on ENV's Compliance Decision Matrix (Appendix III). All of these inspections determined that the likelihood of future compliance was at either a Category A or B. Category A indicates a reasonable and cooperative attitude, and Category B is defined as indication of future and ongoing compliance are uncertain with a few previous occurrences of non-compliance; and/or questionable awareness of and/or capacity to meet regulatory requirements.

Warnings made up 1% of the reports issued. They were issued for non-compliances assessed at a Level of 1 or 2 on the non-compliance decision matrix, with a Category B rating. Two Warnings were issued for failing to have an EMP or be a member of an association with an EMP, and for failing to produce a report.

Compliance Rates with the VDR Regulation Requirements

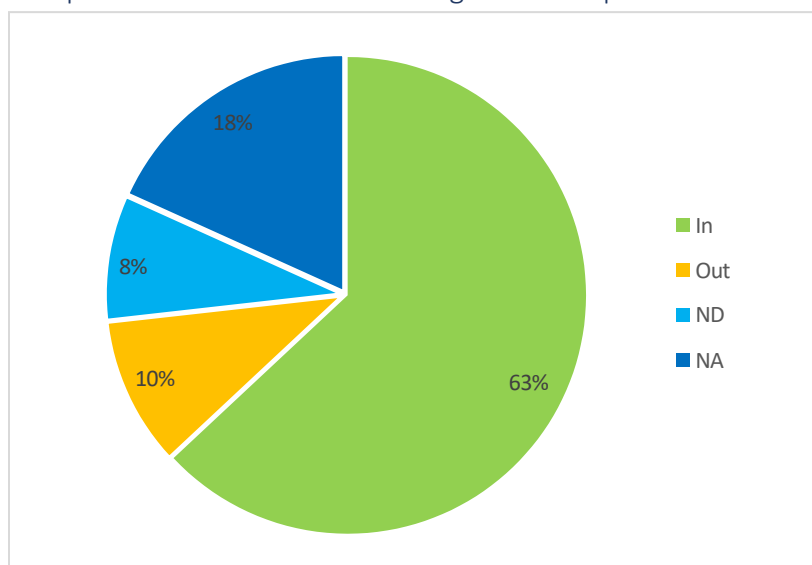


Figure 3 – VDR Overall Compliance Determination

The VDR Audit verified compliance with selected VDR clauses for a total of 1699 individual compliance determinations (Figure 3).

The percentage of clauses that were found to be in compliance was 63%. This was followed by not applicable (NA) at 18%, and then out of compliance at 10%. For 8% of the clauses assessed, there was not enough information to make a compliance determination, which resulted in a compliance determination of not determined (ND).

Compliance with Categories

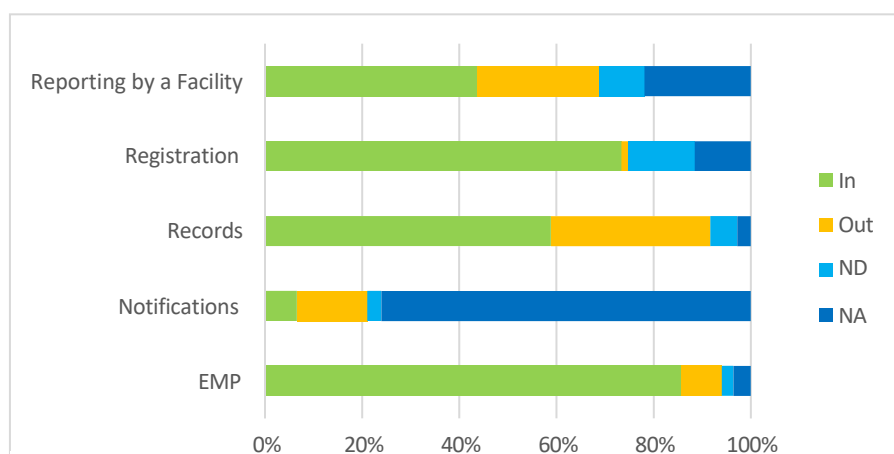


Figure 4 - Compliance determinations separated into similar clause categories

Figure 4 presents the compliance determinations separated into similar clause categories.

The majority of facilities inspected were in compliance with the clause categories with some exceptions. The notification category resulted in mostly NA compliance determinations (76% of facilities). Records (33%) and reporting by a Facility (25%) were the most common categories that were found to be out of compliance.

VDR clause categories were further broken down into sub-categories, as presented in Table 3 below.

Table 3: VDR Rates of Compliance by Sub-category

			In		Not Applicable		Not Determined		Out		Total
VDR Clause Section Number	Category	Sub-Category	Count	%	Count	%	Count	%	Count	%	Count
2 (1)(a)	EMP	Has an EMP	118	94%	1	1%	1	1%	5	4%	125
2 (3)(a)	EMP	Plan approved by a QP	11	58%	2	11%	3	16%	3	16%	19
2 (3)(b)(i)	EMP	EMP - ODS	14	88%		0%		0%	2	13%	16
2 (3)(b)(ii)	EMP	EMP - Hydrocarbons	13	93%	-	0%	-	0%	1	7%	14
2 (3)(b)(iii)	EMP	EMP - Antifreeze	14	100%	-	0%	-	0%	-	0%	14
2 (3)(b)(iv)	EMP	EMP - Lead-acid batteries	14	100%	-	0%	-	0%	-	0%	14
2 (3)(b)(v)	EMP	EMP - Tires	14	100%	-	0%	-	0%	-	0%	14
2 (3)(b)(vi)	EMP	EMP - Hg switches	14	100%	-	0%	-	0%	-	0%	14
2 (3)(b)(vii)	EMP	EMP - Windshield washer fluid	14	100%	-	0%	-	0%	-	0%	14
2 (3)(c)	EMP	EMP - waste recycling	14	88%	-	0%	-	0%	2	13%	16
2 (3)(d)(i)	EMP	EMP - minimizing waste discharges to the environment	14	88%	-	0%	-	0%	2	13%	16
2 (3)(d)(ii)	EMP	EMP has contingency plan	13	87%	-	0%	-	0%	2	13%	15
2 (4)(a)	EMP	EMP is reviewed	7	54%	2	15%	-	0%	4	31%	13
2 (4)(b)	EMP	EMP is amended as needed	4	44%	2	22%	2	22%	1	11%	9
2 (4)(c)	EMP	Updated to EMP are signed by a QP	4	36%	3	27%		0%	4	36%	11
3 (1)(a)	Registration	Registration includes Facility name	126	98%	-	0%	1	1%	1	1%	128

			In		Not Applicable		Not Determined		Out		Total
VDR Clause Section Number	Category	Sub-Category	Count	%	Count	%	Count	%	Count	%	Count
3 (1)(b)	Registration	Registration includes Facility contact	55	47%	-	0%	61	52%	2	2%	118
3 (1)(c)	Registration	Registration includes Facility address and legal description	114	95%	-	0%	3	3%	3	3%	120
3 (1)(d)	Registration	Registration includes address of where the EMP can be viewed	79	65%	2	2%	38	31%	2	2%	121
3 (1)(e)	Registration	Registration includes confirmation of EMP or Membership	103	90%	1	1%	7	6%	3	3%	114
3 (1)(f)	Registration	Registration includes other relevant information	12	12%	90	88%	-	0%	-	0%	102
3 (3)(a)	Notification	Notification of change in information	10	8%	77	64%	3	3%	30	25%	120
3 (3)(b)	Notification	Notification of ceasing to operate	6	5%	107	88%	4	3%	5	4%	122
4 (1)(a)	Reporting by a Facility	Reporting two years following registration	2	14%	6	43%	3	21%	3	21%	14
4 (1)(b)	Reporting by a Facility	Reporting every two years	4	31%	-	0%	-	0%	9	69%	13
4 (2)(a)	Reporting by a Facility	Report is in writing	5	56%	3	33%	1	11%	-	0%	9

			In		Not Applicable		Not Determined		Out		Total
VDR Clause Section Number	Category	Sub-Category	Count	%	Count	%	Count	%	Count	%	Count
4 (2)(b)(i)	Reporting by a Facility	Report describes waste management	6	75%	2	25%	-	0%	-	0%	8
4 (2)(b)(ii)	Reporting by a Facility	Report describes in waste management was in accordance with the EMP	4	80%	1	20%	-	0%	-	0%	5
4 (2)(b)(iii)	Reporting by a Facility	Report describes the effectiveness of the EMP in reducing wastes to the environment	4	80%	1	20%	-	0%	-	0%	5
4 (2)(c)	Reporting by a Facility	Report is completed on time	3	30%	1	10%	2	20%	4	40%	10
6	Maintaining an EMP	Maintaining an EMP	7	54%	2	15%	2	15%	2	15%	13
7 (1)	Records	EMP and report are kept at the Facility	49	38%	4	3%	10	8%	65	51%	128
7 (2)	Records	EMP or Report are provided for inspection	100	80%	3	2%	4	3%	18	14%	125
Grand Total			1071	63%	310	18%	145	9%	173	10%	1699

Across all Facilities inspected, certain clause categories had higher levels of compliance than others. For example, 94% of Facilities were in compliance with the requirements to have an EMP, while only 38% of facilities kept the report and EMP at the facility.

Environmental Management Plan (EMP)

A total of 16 Facilities were inspected as non-association Facilities. This means that the vehicle dismantling facilities were not members of an association and were therefore, required to have a qualified professional (QP) develop an EMP for their facility. The additional clauses that apply to non-association facilities are identified in Table 3. The rates of compliance with the clauses that apply to the content of the EMP (2(3) and 2(4)), ranged from 36 to 100%. Overall, the EMPs contained the required information concerning the care and disposal of hazardous wastes. Lower rates of compliance were found for the requirement to maintain the EMP (44%) and have it signed by a QP (36%).

Registration

Compliance with the registration requirement to include the Facility contact, and the address where the EMP can be viewed, had high rates of ND findings (52%) due to the administrative forms used. The forms available between November 2007 and July 2019 did not require the address of the local contact. Therefore, compliance with this requirement could not be determined for 61 facilities.

Notifications

Notification to ENV for a change to the information required for registration with the VDR was NA for 64% of the facilities. The non-compliance rate for this requirement was 25%. Notification to the director for ceasing operations, was NA for 88%, and out of compliance at 4% of the remaining facilities.

Reporting by a non-association Facility

Rates of non-compliance was 69% with the requirement to produce a report every two years. Additionally, 40% of facilities failed to complete the report within the required time frame.

Records

During the on-site inspections, 80% of the facilities were able to produce the report or EMP for the inspecting ENV officer. However, only 38% of facilities kept both the EMP and the report at the facility address. At 51% of the facilities, the operators were unable to provide both the report and EMP.

Automotive Recyclers Environmental Association

The VDR clauses that were used to assess compliance with AREA are presented in Table 2. The results of the AREA inspection are presented in Table 5 of Appendix III. AREA followed most VDR requirements with a few exceptions, which are as follows:

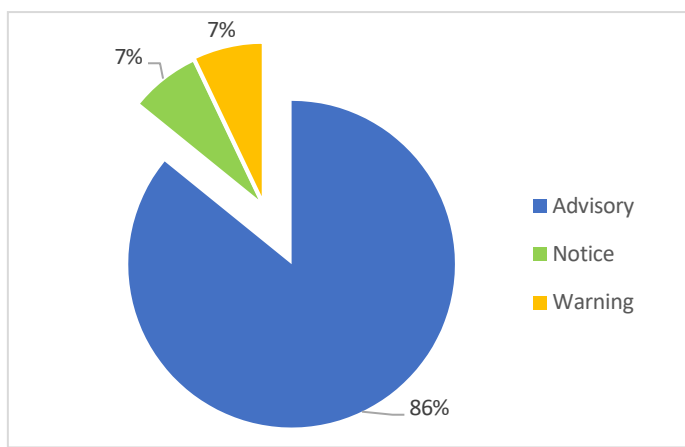
- The EMP did not describe how each waste listed in the VDR will be stored, treated, recycled, or disposed of in compliance with EMA and applicable regulations.
- The report failed to include elements required by sections 5 (2)(c), 5 (2)(d)(i), 5 (2)(d)(ii), and 5 (2)(d)(iii) of the VDR.
- The report did not include a completion date; therefore, it could not be determined if it was completed on time, or updated as required.
- There was no list of members in the report, or any member audit tracking information. Therefore, it could not be determined if a third of their members were audited by AREA, as required by the VDR.

The inspection of AREA resulted in a Level 1 for the environmental impact, with a Category B for the likelihood of compliance. The inspection outcome was an Advisory of non-compliance.

Hazardous Waste Regulation

Inspection Outcome

Of the 124 facilities, 7% were found to be in compliance with all of the selected sections of the HWR (Figure 5) and 93% were found to be non-compliant with at least one of the selected sections of the HWR which resulted in an inspection response of an Advisory or Warning. None of the inspections resulted in a referral for an AMP.



The Advisory and Warning responses were issued for non-compliances with administrative requirements, such as not retaining the applicable copy of the waste shipping document (manifest), and for operational requirements such as failing to keep containers closed when not in use, and for failing to label waste containers with the name of their contents.

For the non-compliant inspections, 86% were issued Advisories and 7% were issued Warnings.

Figure 5 – Hazardous Waste Inspection Response

using the non-compliance decision matrix to have a Level 1 or 2 with a Category A or B rating. A total of 9 warning letters were issued. Of the 9 warnings, 2 were assessed at a Level 2 for the environmental impact with a Category B for the likelihood of compliance.

Advisories and Warnings issued were assessed

Compliance with HWR Requirements

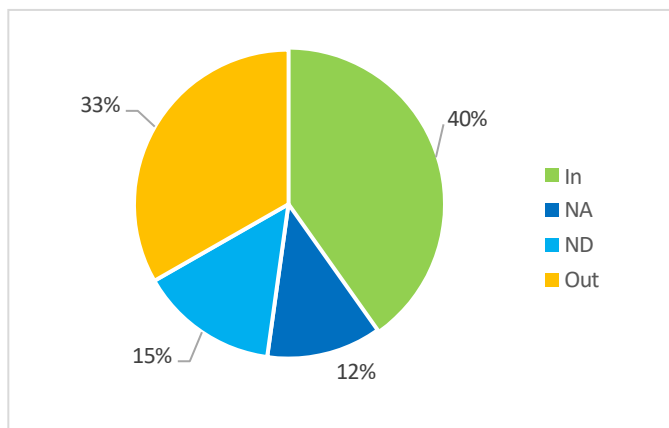


Figure 6 – HWR Overall Compliance Determination

The VDR Audit verified compliance with the HWR clauses for a total of 870 individual compliance determinations (Table 4). The percentage of clauses that were determined to be in compliance was 40% (Figure 6). This was followed by out at 33%, and then NA, with 12%. For 15% of the clauses assessed, there was not enough information to make a compliance determination (ND). Table 4 presents the compliance determinations separated into similar clause categories. The rates of compliance with the HWR clause

categories ranged between 7% and 84%.

Compliance With Categories

BC Generator Requirement

The BC Generator (BCG) Requirement category requires the facility to register as a generator if the amount of hazardous waste generated at the facility, in a 30-day period, is greater than the quantity set out in Column II of Schedule 6 in the HWR. Compliance with this requirement was found to be NA for 62 percent of the facilities inspected. Nineteen facilities (15%) were found to be in compliance, and twelve facilities (9%) were found to be out of compliance with the requirement to register as a generator. For 17 facilities (13%) there was not enough information to make a compliance determination.

Manifests

Two sub-categories were assessed for compliance with HWR waste manifest requirements; that the correct copy of the manifest was retained at the facility, and that the manifest was filled out correctly (Table 4). Only 7% of facilities (9 facilities) were in compliance with the requirement to retain the correct copy of the hazardous waste shipping manifest while, 76%, failed to retain the correct copy of the manifest at the facility. As a result, ENV staff were unable determine if manifests were filled in correctly for 68% of the facilities.

Waste Storage

The waste storage requirements to keep lids on hazardous waste storage containers at all times during storage and transport was in compliance at 49% of the facilities, and out of compliance at 47% of the facilities (Table 4). Waste was observed to be handled in a manner that would not cause the container to rupture or leak at 84% of facilities. Containers were secure under normal conditions of storage at 77% of facilities. Labels identifying the contents of the containers were in compliance at 41% of the facilities inspected, and out of compliance at 55% of the facilities.

Table 4 - HWR Rates of Compliance by Sub-category

HWR Clause Section Number	Category	Sub- Category	In		Not Applicable		Not Determined		Out		Total
			Count	%	Count	%	Count	%	Count	%	
43(1)	BCG Requirement	BCG Requirement	19	15%	79	62%	17	13%	12	9%	127
46(5)	Manifests	Manifest filled out correctly	22	18%	11	9%	81	68%	6	5%	120
46(9)	Manifests	Copy retained at the Facility	9	7%	9	7%	12	10%	95	76%	125
50(3)(a)	Waste Storage	Containers kept closed	62	49%	3	2%	2	2%	60	47%	127

			In		Not Applicable		Not Determined		Out		Total
HWR Clause Section Number	Category	Sub-Category	Count	%	Count	%	Count	%	Count	%	
50(3)(b)	Waste Storage	Not handled in a manner that would cause rupture or leak	103	84%	2	2%	1	1%	16	13%	122
50(3)(c)	Waste Storage	Containers are labelled	51	41%	2	2%	3	2%	69	55%	125
50(8)	Waste Storage	Containers are secure under normal conditions	96	77%	2	2%	6	5%	20	16%	124
	Grand Total		362	42%	108	12%	122	14%	278	32%	870

Discussion and Recommendations

Overall Compliance Results

Across all facilities inspected for compliance with the VDR, the majority of clauses (63%) were found to be in compliance. For the facilities inspected for compliance with the HWR only 42% of all clauses were in compliance.

70% of the VDR inspections resulted in an Advisory of non-compliance response. Followed by a Notice of compliance response, with 29%. The least common inspection response issued to inspected facilities was a Warning of non-compliance with 1%.

86% of HWR inspections resulted in an Advisory of non-compliance response. Followed by both Notice of compliance and Warning of non-compliance tied with 7%.

The inspection of AREA resulted in a Level 1 level, environmental impact, and a Category B, likelihood of compliance. The inspection response was an Advisory of non-compliance.

The inspections that resulted in an Advisory or Warning response were assigned a non-compliance decision matrix level of “0” and “1”, threat to the environment and human health, for 95% of the VDR inspections, and for 84% for the HWR inspections. This overall finding supports the notion that the industry poses a lower risk to the environment and human health.

Vehicle Dismantling and Recycling Industry Environmental Planning Regulation

The results of the tallied compliance findings for each VDR clause category showed high levels of compliance across most clause categories. Lower levels of compliance were found for the EMP requirements for non-association facilities. However, it should be noted that a sample size of only 16 was used for non-association facilities and may not be representative of the sector.

All facilities had high rates of compliance with the requirement to have an EMP or to be a member of an association that provides an EMP. The EMPs for non-association facilities contained the required information, with compliance rates between 88% and 100%. The EMP prepared by AREA for its members showed a high level of compliance with the EMP requirements. AREA's EMP was found to be in compliance with 16 of 17 EMP requirements assessed for compliance.

Where non-association facilities had lower compliance rates was with the EMP reporting requirements. Including the requirements to produce a report, prepared by a QP, every two years, and to submit the report by the required due date. The report serves as a tool to assess how effective the EMP is for environmental protection. The report describes how wastes at the facility are managed, whether wastes are managed in accordance with the EMP, and how effective those management practices are at protecting the environment. It was noted during the compliance inspection of AREA that the report prepared by AREA for their members was different than the report prepared for ENV. This meant that the report kept at the dismantling facilities was not the required report.

One notable deficiency of the VDR is that it does not have a requirement for facilities to follow the EMP. Therefore, deviations from the EMP would not result in and non-compliance, and there could be no compliance enforcement action.

Some of the categories with the highest non-compliance rates (above 25%) were as follows:

- EMP Review (non-association),
- updates to the EMP are signed by a QP (non-association),
- notification of a change in information provided in the registration (all facilities),
- reporting every two years (non-association),
- report submitted on time (non-association), and
- EMP and report are kept at the facility (all facilities).

The higher rates of non-compliance with the EMP clause category were observed with the non-association facilities supports the notion that AREA members are achieving higher rates of compliance with their membership. It should be noted again that because of the low non-association facility sample size, the rates of compliance may not be truly representative of all non-association members within the province.

The low percentage (8%) of not determined findings with all of the VDR clauses that were assessed, supports the notion that, in most cases, compliance can be assessed with the requirements of the VDR. The highest rates of not determined findings were in the registration category (sub-categories included, facility contact, and address were the EMP can be viewed). The Ministries registration form has been updated to ensure all that all the required entry fields and requirements are clearer for the registrants.

Compliance with 18% of all VDR clauses were assessed to be not applicable, for many of these clauses the requirement was found to be not applicable because they relate to provisional clauses such as notifications, reporting intervals, and signing of updated EMPs.

When the removed facilities, that were no longer operating, are added back into the dataset, non-compliance rates with the notification clauses increased from 4% to 35%.

Additionally, within the VDR there is no clause requiring registrants to “cancel” their registration, as the VDR only requires “notification”. This is an area where the VDR could be improved to clarify the requirements for the registrants and reduce the number of non-active facilities within ENV’s authorizations database.

Hazardous Waste Regulation

The results of the tallied compliance findings for each HWR clause showed moderate levels of compliance across all clause categories. Overall, 42% of the HWR clauses were found to be in compliance, and 32% were found to be out of compliance, 12% were ND and 14% were NA.

Some of the categories with the highest levels of non-compliance were for manifests (retained at the facility), keeping hazardous waste containers closed, and for failing to label containers with the name of the hazardous waste they contained.

Provincial shipping manifests are required under section 46 of the HWR for quantities of hazardous wastes that are greater than those laid out in section 46(1) of the HWR. Only 7% of facilities were in compliance. Most facilities (76%) were out of compliance. Manifesting presents an opportunity for improvement in the industry and potential for procedural improvements.

Because manifests were not kept at most facilities, ENV was unable to confirm if they were filled in correctly, resulting in a rate of 68% not determined with section 46(5).



Photo 2 – Oil pan stored in the opening of an unlabelled hazardous waste storage drum

The requirements, to keep hazardous waste containers closed at all material times, had a compliance rate of 49%, with a non-compliance rate of 47%. A review of ENV’s inspection records confirmed the common practice to keep an oil pan or funnel in the opening of the waste container when not in use led to the non-compliance in many cases (photo 2).



Photo 3 –Hazardous waste stored in open pails and all of the containers are unlabelled.

Another common practice for waste management was storing hazardous waste in pails without lids (photo 3). In addition to failing to keep containers closed, 55% of facilities failed to adequately label waste containers with their contents.

Other HWR sub-categories for waste storage involved container handling requirements; not handled in a manner that would cause rupture or leak, and containers are kept secure under normal conditions. These sub-categories had high levels of compliance. 84% of facilities handled waste containers in a manner that wouldn't cause them to rupture or leak, and 77% of facilities kept their waste containers secure under normal conditions.

Waste storage and record keeping are areas in which there is room for improvement in the vehicle dismantling industry to achieve higher levels of compliance with the HWR.

The overall rate of non-compliance with the HWR was 86% with a non-compliance decision matrix level of environmental impact of 1 and 2, which resulted in an outcome of an advisory of non-compliance.

Therefore, the inspections found the non-compliances to have a low level of impact on the environment and human health, supporting the notion that the industry has a low impact to the environment and human health, which aligns with the results of the VDR inspections.

AREA

The EMP provided by AREA did not have a clear version history. Additionally, determining what would constitute a need for change to the EMP is subjective and would present a challenge in verifying compliance with that requirement.

The report used to verify compliance with the VDR requirements was the one provided to ENV by AREA for the purposes of verifying compliance with the VDR, and not the report kept at the vehicle dismantling facilities. The report prepared by AREA did not have a date of completion; therefore, it could not be determined if it was completed by the required due date. The report also failed to have a list of their members that were audited during the reporting cycle or previous reporting cycles. There is also no VDR requirement to provide this information which presents a challenge for ENV to determine if one-third of AREA's members are being audited in a three-year cycle as required by section 5(3)(b). The report did not meet 4 of the 8 requirements that were assessed for compliance.

Conclusion

The majority of dismantlers had never been inspected by ENV. The VDR Audit presented ENV the opportunity to provide guidance and education through on-site inspections, and provide compliance feedback within the inspection record. This sector audit was conducted to promote compliance in a fair and consistent manner across the sector. This is the first audit of the vehicle dismantling and recycling industry, and one of the audit objectives was to improve compliance rates. Almost all of the audited facilities had not been inspected in 5 years, with the exception of four facilities, which had previously received a warning of non-compliance.

The audit increased ENV's communication with facilities and AREA because of ENV's increased on-site presence within the vehicle dismantling industry between 2020 and 2021. ENV staff interacted with facilities and AREA and informed them of the regulatory requirements and helped clarify points of confusion for operators.

Using the Non-Compliance Decision Matrix none of the inspections under the VDR and HWR resulted in a level of environmental impact higher than a 2. This concludes that all the non-compliances were determined at most to have a minor and temporary impact to the environment or human health and safety. The vehicle dismantling, and recycling industry is a lower risk industry as it is listed in schedule 2 of the WDR, which is supported by the results of this audit.

Low levels of compliance with the HWR requirements presents the vehicle dismantling industry an opportunity for improvement. It is also an opportunity for improvement for ENV to provide a more manageable solution for record-keeping for facilities that don't manage hazardous waste as their primary business.

Recommendations

The results of the audit showed that there is room for improvement in compliance and enforceability for both the VDR and the HWR within the vehicle dismantling and recycling industry. Some of the proposed improvements include:

- Provide a requirement for dismantlers to follow the EMP prepared for their facility;
- Promote the proper practices for the storage and labeling of hazardous waste;
- Promote learning opportunities for waste manifest record keeping;
- Promote learning opportunities for what reports are required to keep at the facility;
- Require associations to provide their audit cycle information so that compliance can be verified with the inspection cycle for the association;
- Clarify and improve upon the de-registration processes for facilities that are no longer operating to allow ENV to maintain an up-to-date registrant database;
- Improve communication between the associations, ENV, and facilities so that requirements for the storage of hazardous waste in the HWR are included in the EMP;

Appendices

Appendix I: Definition of Hazardous waste in the EMA

“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,
- (d) waste oil,
- (e) waste asbestos,
- (f) waste pest control product containers and wastes containing pest control products, including wastes produced in the production of treated wood products using pest control products,
- (g) leachable toxic waste,
- (h) waste containing tetrachloroethylene,
 - (h.1) wastes listed in Schedule 7,
 - (h.2) Repealed. [B.C. Reg. 261/2006, s. 1 (b).]
- (i) waste containing polycyclic aromatic hydrocarbon, and
 - (i.1) Repealed. [B.C. Reg. 319/2004, s. 3 (e).]
 - (i.2) on site media that is stored ex situ unless the on site media is stored for one of the purposes set out under subsection (3),
but does not include
- (j) household refuse that is collected from residential premises,
- (k) domestic sewage,
- (l) dangerous goods that are defective, surplus or otherwise not usable for their intended purpose and that are in the process of being returned directly to a manufacturer or supplier,
- (m) asphalts and tars used in the manufacture of asphaltic concrete and roofing materials,
- (n) and (o) Repealed. [B.C. Reg. 214/2004, s. 1 (l).]
- (p) waste wood products treated with wood preservatives or wood protection products registered under the *Pest Control Products Act* (Canada),
- (q) household hazardous waste that
 - (i) is removed from a return collection facility in accordance with an authorization from the owner of the return collection facility, and
 - (ii) is to be reused for its originally intended purpose,
- (r) wood ash, or pulp mill dregs and grit, that would be hazardous waste only because they are classified under the federal dangerous goods regulations as class 8, or
- (s) waste that
 - (i) has a pH greater than or equal to 2.0 and less than or equal to 12.5, and
 - (ii) would be a hazardous waste only because it is classified under the federal dangerous goods regulations as class 8 because of pH,
- (t) on site media;

[Appendices could include tables of inspected sites/parties, non-compliance decision matrix, etc.]

Appendix II - Vehicle Dismantling Facilities Included in the VDR Audit

HWR Inspection Record	VDR Inspection Record	Facility Name	Location	Authorization Number
156610	156608	Armstrong Auto Recycling	Armstrong	100516
156613	156612	Cherry Wreckers Recyclers	Cherryville	109532
157251	157204	Krankin' Vintage Restoration	Princeton	107913
161169	161164	Puds Auto Wrecking & Towing	Osooyos	100523
177620	176452	Westshore Auto Recycling	Sooke	106986
174925	174910	Will'S Salvage	Kelowna	107404
NA	165417	Evolved Auto Recyclers	Port Coquitlam	105075
NA	176511	Uplands Sales	Coombs	103458
154436	154434	"99" Truck Parts & Industrial Equipment Ltd.	Surrey	103193
176182	176171	The Chop Shop Cycle	Richmond	103240
176130	176081	Hope Import Auto Parts & Auto Sales	Hope	100307
179325	179138	Bimmer Parts	Duncan	100298
170736	170726	Empire Abbotsford Recycled Auto Parts	Abbotsford	100398
155127	155112	Toyoda 4Wd	Kamloops	106126
157780	157487	Alpi'S European Used Auto Parts	Surrey	100311
174976	174977	Highway 4 Auto Salvage	Coombs, BC	100303
NA	164875	4-C Sales	Sicomous	100317
174163	172092	K & G Auto Recycling	Langley	100345
NA	155273	A - Prime Autowrecking Ltd.	Surrey	105617
NA	163433	A & J Auto Supply	Richmond	108183
NA	169875	A Line Auto Parts Ltd.	Burnaby	100342
162058	162056	A. Kamloops Used Truck & Auto Parts (1989) Ltd.	Kamloops	100315
175970	175969	A.A. Atlas Auto Wrecking Ltd.	Richmond	100348
173581	173542	A.B.C Recycling (Prince George) Ltd.	Prince George	106179
176116	173814	A.B.C. Recycling (Fort St. John) Ltd.	Fort St. John	106640
156749	155826	A.B.C. Recycling (Kelowna) Ltd.	Kelowna	100461
162538	162536	A.B.C. Recycling (Terrace) Ltd.	Terrace	106178
153074	153073	A.B.C. Recycling Ltd. (Burnaby)	Burnaby	100389
177356	177297	A.B.C. Recycling Ltd. (Nanaimo)	Nanaimo	107497
177743	176455	Abc Recycling (Campbell River)	Campbell River	106445
155750	155747	Abba Towing & Storage (1995) Ltd.	Princeton	108867
170731	170724	Abbotsford Truck & Trailer Repair Ltd.	Abbotsford	108072

HWR Inspection Record	VDR Inspection Record	Facility Name	Location	Authorization Number
NA	176622	Accel Towing	Parksville	103466
153868	153869	Ace German Used Parts Ltd.	Burnaby	100408
157781	157669	A-Central Used Auto Parts Ltd.	Surrey	100466
180120	180113	A-Class Auto Parts Recycling Ltd.	Maple Ridge	106554
165425	165250	Affordable Auto Parts Ltd.	Burnaby	100339
174160	172080	A-Gateway Autowrecking Ltd.	Langley	100265
175830	175815	Alberni Foundry Limited	Port Alberni	107392
170613	172812	Aldergrove Auto Wrecking Ltd.	Abbotsford	100440
NA	153346	Al'S Auto Wrecking Ltd.	Surrey	100463
NA	153347	Al'S Discount Auto Wrecking	Surrey	100465
153850	153858	A-Best Auto Wrecking	Surrey	100464
174881	174874	Annex Auto Parts (1997) Ltd.	Nanaimo	100305
165421	165246	Apex Automotive Inc.	Port Coquitlam	108523
155749	155746	Apple Valley Auto Recycling & Service	Kelowna	104075
171284	171192	Ar&A Autowrecking Ltd.	Maple Ridge	106000
NA	156611	Armstrong Towing & Auto Recycling	Armstrong	106248
173850	173849	A-Star Automotive Recyclers Ltd.	Prince George	100289
NA	168196	Aurora Truck Centre Ltd.	Houston	100489
NA	171996	Autobahn Dismantlers	Langley	100431
NA	162059	Axel'S Auto Service Ltd.	Kamloops	103194
176180	176164	Mitchell Auto Salvage	Richmond	100308
176241	176042	B.C. Auto Wrecking Ltd.	Nanaimo	100272
157126	157074	Bc Teen Challenge	Lake Country	106400
162530	162523	Bee Jay Auto Wrecking & Towing Ltd.	Williams Lake	100264
174539	173810	Belsum Enterprises Ltd.	Dawson Creek	100343
165052	165029	Ben'S Towing & Auto Wrecking Ltd.	Salmon Arm	100290
NA	160711	Big Valley Towing	Vernon	106423
157591	156774	Big Y Auto Recycling	Grand Forks	106290
177235	177234	Blacky'S Auto Recycling Ltd.	Duncan	100310
170730	170720	Capt'N Crunch Auto Wrecking Ltd.	Abbotsford	100363
160428	160376	Cariboo Salvage & Recycling Ltd.	Clinton	106464
NA	171582	Cawkwell Family Automotive Inc.	Abbotsford	109033
175961	175958	Cee Gee'S Auto Wrecking Ltd.	Richmond	100280
162041	162040	Central Salvage Ltd.	Kamloops	107735

HWR Inspection Record	VDR Inspection Record	Facility Name	Location	Authorization Number
NA	157173	Central Valley Truck Services Ltd.	Kelowna	106402
NA	165247	Century Truck Sales & Parts Inc.	Port Coquitlam	106314
175578	175573	Chapman Motors Ltd.	Cobble Hill	100273
161536	161292	Cherrilyn Magnusson	Golden	106186
174158	172079	Classic Auto Recyclers 2005 Ltd.	Langley	100468
NA	176167	Coast Import Auto Supply	Richmond	100274
NA	176896	Comox Valley Auto Recycle	Surrey	100281
155128	155113	D & G Gill Tire And Auto Ltd.	Kamloops	105804
160957	160936	D & M Used Auto Parts Ltd.	Lumby	100319
NA	161032	D & M Used Auto Parts Ltd.	Kelowna	100318
NA	165245	Denon Performance Products Inc.	Port Coquitlam	107391
NA	170611	Dharney'S Salvage & Enterprises Ltd.	Langley	100447
153279	153239	Donald E. Charlton Ltd.	Surrey	100456
171779	171776	Donald E. Charlton Ltd.	Burnaby	100455
177220	177208	Duke Point Auto Recyclers Ltd.	Nanaimo	100365
176220	176160	Eco Tire And Auto Parts Ltd.	Nanaimo	103468
153846	153847	Elcam Auto Recyclers Ltd.	Burnaby	100291
175576	175550	Maxwells New & Used Auto & Truck Parts	Mill Bay	100266
150875	150871	Farbrook Auto Wrecking (1979) Ltd.	Cranbrook	100283
177085	177072	Fn 99 New And Used Auto Parts Ltd.	Campbell River	100306
NA	171213	Fraser Valley Truck Parts	Maple Ridge	103182
154286	154270	Frontier Sales & Salvage Ltd.	Prince George	103453
159162	158812	Garrick Automotive Ltd.	Chase	100469
171281	171181	Gary'S Auto Wrecking & Salvage Ltd.	Maple Ridge	100313
174540	173812	Generic Towing & Auto Parts Ltd.	Fort St. John	100371
NA	175537	H.K. Eco Auto Recycling (Chwk) Ltd.	Chilliwack	103896
154229	154143	Hari Truck & Trailer Repair Ltd.	Surrey	109984
156152	156045	Ideal Auto Wrecking Ltd.	Chilliwack	100435
NA	156049	Ideal Auto Wrecking Ltd.	Chilliwack	100436
NA	171579	Insurance Corporation Of British Columbia	Abbotsford	106471
NA	155487	Interior Metal Recycling Inc.	Kelowna	106098

HWR Inspection Record	VDR Inspection Record	Facility Name	Location	Authorization Number
NA	150422	J & K Autowrecking Ltd.	Surrey	104057
175973	175971	J.K Japanese Used & New Auto Parts Ltd.	Richmond	100346
NA	155114	Jeff Lodge	Kamloops	105734
156616	156615	Vernon Auto Wreckers	Vernon	100490
154678	154677	Kens Auto Recyclers	Surrey	108190
NA	154679	Kens Japanese Used Auto Parts	Surrey	105307
NA	169926	Kitimat Automotive Recycling, Ltd.	Kitimat	100300
178964	178304	Kool Country Auto Parts Towing & Rads Ltd.	Invermere	100459
NA	172021	Langley Discount Used Auto & Truck Parts Ltd.	Langley	100368
159823	158814	Starlite Auto A Division Of Notch Hill Auto Wrecking & Repair	Sorrento	105687
170615	170609	M A Auto Enterprises	Chilliwack	100415
161057	161056	Barbarian Motor Works	Salmon Arm	108187
172577	172525	Malahat Auto Parts Ltd.	Malahat	100302
NA	158319	Maple Ridge Auto And Metal Recycling Ltd.	Maple Ridge	100304
NA	175387	Maple Ridge Auto Parts Ltd.	Maple Ridge	109303
157000	NA	Mario'S Towing Ltd	Kelowna	106763
NA	176166	Mars Auto Sales Ltd.	Richmond	108324
NA	171583	Max Truck Repair Ltd.	Abbotsford	108148
NA	170608	Mcneil'S Auto Recyclers And/Or Ideal U Pick	Chilliwack	103288
NA	160368	Me Too Towing	Lillooet	107606
NA	157160	Merritt Auto Wrecking Ltd.	Merritt	100439
173924	173906	Valley Affordable Towing & Scrap Metal	Courtenay	107937
156563	156536	Mayday Auto	Cawston	106643
NA	165243	Mostly German Auto Recycling Inc.	New Westminster	106467
162482	146566	Action Steel	Penticton	104861
168371	168370	North Central Truck Parts Ltd.	Prince George	100288
170614	170605	Northwest Used Auto Parts (Richmond) Ltd.	Abbotsford	100340
176183	176174	Osaka Japanese Auto Parts Ltd.	Richmond	103469
159202	153140	P & R Truck Parts	Prince George	103876
176181	176170	Parts Hub	Richmond	106895
NA	157154	Path Recycling	Merritt	106959
170247	170710	Payless Repairs Ltd.	Abbotsford	100336

HWR Inspection Record	VDR Inspection Record	Facility Name	Location	Authorization Number
NA	176168	Persia Enterprise Co. Ltd.	Richmond	103551
NA	157915	Pick A Part Auto Parts & Sales Ltd.	Chilliwack	100453
171692	171686	Pinedale Auto Wreckers (1989) Ltd.	Prince George	100433
177134	177132	Powerhouse Recycled Auto & Truck Parts Ltd.	Cumberland	100301
165423	165248	Prestige Auto Parts Ltd.	Coquitlam	108152
168360	168357	Prince George Auto Wrecking Ltd.	Prince George	100286
NA	171201	Rb Auto Parts Ltd.	Maple Ridge	107608
171760	171197	Rb Auto Wrecking Ltd.	Maple Ridge	109257
NA	162061	Rebel Auto Sales & Service Ltd.	Kamloops	100417
156607	156506	Redline Recreation	Armstrong	100501
154437	154435	Reid'S Automotive Recycling Ltd.	Burnaby	100380
175846	173813	Richmond Steel Recycling	Fort St. John	107209
154674	153214	Richmond Steel Recycling Limited	Richmond	105725
NA	157916	Rite Way Auto Recyclers Ltd.	Chilliwack	100454
162055	162054	Rivershore Used Auto Parts (1992) Ltd.	Kamloops	100314
NA	171199	S . T . A Auto Recyclers & Car Sales Ltd.	Maple Ridge	108318
NA	177428	Saltair Recycling Inc.	Ladysmith	104741
NA	176478	San Cheng Auto Parts Ltd.	Richmond	104183
174865	174863	Sandy'S Auto Parts Ltd.	Langford	100434
156462	156452	Save On Parts Auto Wrecking Ltd.	Surrey	100446
154831	150335	Schnitzer Steel Canada Ltd.	Surrey	100413
156897	155828	Pick N'Pull (Kelowna)	Kelowna	100442
NA	154021	Scott Road Trading Ltd.	Surrey	100488
156500	156434	Pourboys Mechanical	Midway	109096
176888	176887	Sherwood Auto Parts Ltd.	Port Alberni	100293
165212	165184	Shuswap Auto Parts Ltd.	Salmon Arm	103075
155740	155737	Sidley Mountain Auto	Bridesville	100285
171794	171793	Skyline Diesel Truck And Trailer Repair Ltd.	Abbotsford	108458
171552	168757	Slater Iron & Salvage Company Ltd.	100 Mile House	106806
153777	153762	Smokey Creek Salvage Ltd.	South Slocan	100296
155278	154832	Westwood Auto Recycling	Surrey	100570
177613	176446	Sooke Total Auto Recycling Ltd.	Sooke	100437

HWR Inspection Record	VDR Inspection Record	Facility Name	Location	Authorization Number
159786	158816	Sorrento Automotive Ltd.	Sorrento	107773
175036	175035	South Island Imports Ltd.	Nanaimo	100458
170735	170725	Srt Diesel Truck & Trailer Repair Ltd.	Abbotsford	108258
176069	175570	Stave Falls Auto Wrecking Ltd.	Mission	100269
NA	177404	Steel Pacific Recycling (A Schnitzer Company)	Duncan	100326
NA	176141	Steel Pacific Recycling (A Schnitzer Company)	Nanaimo	100328
175967	175966	Kwong Kee Auto Parts	Richmond	105102
176459	176049	Super L'Auto Recyclers (1991) Ltd.	Chilliwack	100388
174161	172091	Supersport Motorcycle Works Ltd.	Langley	105425
151574	151573	Tervita Corporation	Kimberley	109092
156778	156758	The Cawston Car Doctor Ltd.	Cawston	106437
173922	173897	Tom Cat Auto-Recycling Ltd.	Langford	100382
155575	153910	U-Fix-It Auto Service Ltd.	New Westminster	105493
162487	162472	Universal Auto Wreckers Ltd.	Quesnel	100309
NA	168225	Viani Holdings Ltd.	Surrey	100299
180117	108109	Volex Auto Recycling Inc.	Maple Ridge	106299
154012	153906	Waneta Auto Recyclers	Trail	100287
NA	173905	Warrens World Of Used Auto Parts	Courtenay	100374
154676	154675	Wasney Automotive Limited	Burnaby	100500
NA	156884	Wedosalvage.Com	Kelowna	108681
NA	171200	Werks Auto Recycling	Maple Ridge	106669
154913	154875	Western Auto Wreckers (1974) Ltd.	Taghum	100429
NA	158798	Westside Used Auto Parts	Salmon Arm	100262
155868	154934	Wheels Truck Parts	Kelowna	100312

Appendix III - AREA Inspection Results

Row Labels	Requirement Description	In	Not Applicable	Not Determined	Out
2 (3)(a)	Plan approved by a QP				
2 (3)(b)(i)	EMP - ODS				
2 (3)(b)(ii)	EMP - Hydrocarbons				
2 (3)(b)(iii)	EMP - Antifreeze				
2 (3)(b)(iv)	EMP - Lead-acid batteries				
2 (3)(b)(v)	EMP - Tires				
2 (3)(b)(vi)	EMP - Hg switches				
2 (3)(b)(vii)	EMP - Windshield washer fluid				
2 (3)(c)	EMP - waste recycling				
2 (3)(d)(i)	EMP - minimizing waste discharges to the environment				
2 (3)(d)(ii)	EMP has contingency plan				
2 (5)(a)	EMP is reviewed				
2 (5)(b)	EMP is amended as needed				
2 (5)(c)	Updates to EMP are signed by a QP				
5 (1)(b)	Report is prepared for period up to Sept. 1, 2010				
5 (2)(a)	Report is completed every 2 years				
5 (2)(b)	Report is in writing				

5 (2)(c)	Report includes names and addresses				
5 (2)(d)(i)	Report includes how many members				
5 (2)(d)(ii)	Report includes results of waste management				
5 (2)(d)(iii)	Report includes effectiveness of waste management				
5 (2)(e)	Report is completed on time				
5 (3)(a)	Report includes one third of the members				
5 (3)(b)	Members are audited every three years				
5 (4)(a)	Report includes one member				
5 (4)(b)	Two consecutive reports include all members				
6	Maintaining an EMP				
Grand Total		17	2	3	5