



Report Date: April 03, 2018

File: 17667

Report Number: 080743

West Coast Fishculture (Lois Lake) Ltd.
C-13 RR#3 Dickson Road
Powell River, BC V8A 5C1

Dear West Coast Fishculture (Lois Lake) Ltd.:

Re: Non-compliance Advisory Letter, Permit 17667, Powell River

On March 13, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an inspection of your facility, West Coast Fishculture (Lois Lake) Ltd. located at West Coast Fishculture (Lois Lake) Ltd. - Powell River - Fish Processing Plant with authorization number 17667 under the *Environmental Management Act*. Ministry staff were accompanied on site by Bill Ferris, West Coast Fishculture (Lois Lake) Ltd.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of West Coast Fishculture (Lois Lake) Ltd., and will be taken into account in the event of future non-compliance.

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

Inspection Details:

Requirement Description:	Environmental Management Act, Environmental Management Act 6 (4): Subject to subsection (5), a person must not introduce waste into the environment in such a manner or quantity as to cause pollution.
--------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Details/Findings:	<p>On March 13, 2018, Ministry of Environment and Climate Change Strategy (ENV) Environmental Protection Officer Travis Kurinka conducted an on-site inspection at West Coast Fishculture (WCF) fish processing plant (the plant) located at Lang Bay near Powell River, British Columbia. WCF is authorized under <i>Environmental Management Act</i> (EMA) effluent permit PE-17667 (the permit) to discharge wastewater originating the plant to the ground. Officer Kurinka was accompanied by Bill Ferris (WCF), Ken Russell (Environment Canada) and Jarret Brochez (Environment Canada) during the inspection.</p> <p>Samples of the processing effluent were taken by the Officer at the time of the inspection. The samples were collected after the effluent had passed through the authorized treatment works, prior to discharge through the outfall (if this is applicable to your site).</p> <p>The analytical results of the effluent (Laboratory Certificate of Analysis attached) were: Parameter Result Units pH 6.77 Total Suspended Solids 56.1 mg/L Ammonia, Total (as N) 20.8 mg/L Nitrate (as N) 0.0667 mg/L Nitrite (as N) 0.0235 mg/L Total Nitrogen 47.3 mg/L Total Organic Nitrogen 26.5 mg/L BOD 280 mg/L COD 680 mg/L Oil and Grease 74.3 mg/L</p> <p>Toxicity = 24% 95% confidence limits: 18 and 32</p> <p>A single sample of the processing effluent was collected; therefore, there are insufficient available data at this time to determine whether the effluent has substantially altered or impaired the usefulness of the environment.</p>
Compliance:	Not Determined
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGE, 1.1.</p> <p>1.1.1: 1.1 This section applies to the discharge of effluent from a fish processing plant. The site reference number for this discharge is E261467. 1.1.1 The maximum authorized rate of discharge is 22.7 cubic metres per day.</p>

Details/Findings:	<p>During the inspection, Mr. Ferris informed Officer Kurinka that WCF has consistent discharge rates throughout the year as WFC receives approximately the 40,000 lbs of fish from the Lois Lake operation on Mondays, Wednesdays, and Friday's which requires the use of totes (60 L/unit), spoons (6 L/min), fillet operations (6 L/min), Pin bone operations (8 L/min), ice melt (15 L/unit), spray bar operation (6 L/min), cleanup activities (20 L/min) toilets (16 L/unit), sinks (60 L/unit), and tote cleaning activities (30 L/unit). Mr. Ferris informed Officer Kurinka that on Tuesdays and Thursdays the plant is still processing fish but does not use the spoons or spray bar on these days. At the time of the inspection, Mr. Ferris provided daily estimated discharge rates for each day of the week:</p> <p>Monday - 12.224 m3 Tuesday - 10.034 m3 Wednesday - 12.224 m3 Thursday - 10.034 m3 Friday - 12.224 m3</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGE, 1.1.</p> <p>1.1.2: 1.1 This section applies to the discharge of effluent from a fish processing plant. The site reference number for this discharge is E261467. 1.1.2 The characteristics of the discharge shall not exceed: 5-day Biochemical Oxygen Demand - 45mg/L, Total Suspended Solids (nonfilterable residue) - 45 mg/L.</p>
Details/Findings:	<p>During the inspection, Mr. Ferris provided Officer Kurinka with a copy of WCFs most recent water quality data, dated March 1, 2018, which was analyzed by Maxxam Analytics, an accredited Laboratory. Based on the analysis, WCF had a 5-day Biochemical Oxygen Demand of 350 mg/L and a Total Suspended Solids (nonfilterable residue) of 48 mg/L.</p>
Compliance:	Out
Actions to be taken:	Ensure that effluent characteristics do not exceed the above permit limits

Requirement Description:	<p>1. AUTHORIZED DISCHARGE, 1.1.</p> <p>1.1.3: 1.1 This section applies to the discharge of effluent from a fish processing plant. The site reference number for this discharge is E261467. 1.1.3 The authorized works are effluent screens, ozone separation and disinfection equipment, secondary treatment plant consisting of primary sedimentation, aeration, and settling tank, and ground disposal field, approximately located as shown on Site Plan A.</p>
Details/Findings:	<p>During the inspection, Officer Kurinka observed the authorized ozone separation (Photo 1) and disinfection equipment, secondary treatment plant consisting of primary sedimentation (Photo 2), aeration (Photo 3), and settling tank, and ground disposal field (Photo 4), approximately located as shown on Site Plan A.</p> <p>During the inspection, Mr. Ferris informed Officer Kurinka that the authorized effluent screens were currently being repaired and updated as the mesh size on the original screens were too fine were prone to becoming plugged with large particulate, originating from the fish processing process. To filter the larger particulate WCF had a 1/4 inch metal screen box (Photo 5).</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGE, 1.1.</p> <p>1.1.4: 1.1 This section applies to the discharge of effluent from a fish processing plant. The site reference number for this discharge is E261467. 1.1.4 The authorized works must be completed and in operation when discharge commences.</p>
Details/Findings:	Officer Kurinka observed the authorized works to be complete and in operation during the inspection.
Compliance:	In
Actions to be taken:	

Requirement Description:	2. GENERAL REQUIREMENTS, 2.1. Maintenance of Works 2.1: 2.1 The permittee shall inspect the authorized works regularly and maintain them in good working order.
Details/Findings:	Mr. Ferris informed Officer Kurinka that WCF conducts daily checks of the authorized works to ensure normal operation. At the time of the inspection, Officer Kurinka observed all authorized works to be in good working order. Mr. Ferris also informed Officer Kurinka that in 2016 half of the disposal field was replaced and upgraded to ensure continued operation of the field.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.2. Bypasses 2.2: 2.2 The discharge of contaminants which have bypassed the authorized treatment works is prohibited unless the approval of the Director is obtained and confirmed in writing.
Details/Findings:	Mr. Ferris informed Officer Kurinka that no bypasses occurred during the inspection period (January 1, 2017, to March 13, 2018). Therefore, this section of the permit is not applicable.
Compliance:	Not Applicable
Actions to be taken:	Please note that if WCF should require a bypass of the authorized works in the future, WCF must notify the Director and obtain approval in writing prior to initiating the bypass.

Requirement Description:	2. GENERAL REQUIREMENTS, 2.3. Emergency Procedures 2.3: 2.3 In the event of an emergency which prevents compliance with a requirement of this permit, that requirement shall be suspended for such time as the emergency continues or until otherwise directed by the Director provided that: (a) Due diligence was exercised in relation to the process, operation or event which caused the emergency and that the emergency occurred notwithstanding this exercise of due diligence; (b) The Regional Manager, Environmental Protection, is immediately notified of the emergency; and (c) It can be demonstrated that everything possible is being done to restore compliance in the shortest possible time. Notwithstanding (a), (b) and (c) above, the Director may require the operation to be suspended or production levels to be reduced to protect the environment while the situation is corrected.
Details/Findings:	Mr. Ferris informed Officer Kurinka that no emergency events occurred during the inspection period. Therefore, this section of the permit is not applicable at this time.
Compliance:	Not Applicable
Actions to be taken:	Please note that if WCF should have an emergency event in the future, WCF must ensure that due diligence was exercised, notify the Director immediately, and demonstrate that everything possible is being done to restore compliance in the shortest possible time.
Requirement Description:	2. GENERAL REQUIREMENTS 2.5. Operating Plan 2.5: 2.5 An operating plan which details the proper operation and maintenance of the wastewater treatment and effluent disposal facility shall be prepared by a qualified professional registered in British Columbia. The plan, kept at the facility and available for review by an officer, may be updated as required by a qualified professional. The facility shall be operated in accordance with the plan.
Details/Findings:	WCF has an operating plan which details the proper operation and maintenance of the wastewater treatment and effluent disposal facility titled "Operating Plan West Coast Fishculture (Lois Lake) Ltd. Lang Bay Road, Powell River, B.C." and was prepared by Dale Allenback (P.Eng) at Sunshine Coast Engineering (1993) Ltd.
Compliance:	In
Actions to be taken:	

Requirement Description:	<p>2. GENERAL REQUIREMENTS, 2.6. Facility Classification and Operator Certification</p> <p>2.6: 2.6 The permittee shall have the works authorized by this permit classified (and the classification shall be maintained) by the Environmental Operators Certification Program Society (Society). The works shall be operated and maintained by persons certified within and according to the program provided by the Society. Certification must be completed to the satisfaction of the Director. In addition, the Regional Manager, Environmental Protection, shall be notified of the classification level of the facility and certification levels of the operators, and changes of operators and/or operator certification levels within 30 days of any change. Alternatively, the works authorized by this permit shall be operated and maintained by persons who the permittee can demonstrate to the satisfaction of the Director, are qualified in the safe and proper operation of the facility for the protection of the environment.</p>
Details/Findings:	At the time of the inspection, Mr. Ferris produced WCFs EOCP facility certificate (#1390) which classifies the WCF wastewater treatment system as a small wastewater system (SWWS).
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>2. GENERAL REQUIREMENTS, 2.6. Facility Classification and Operator Certification</p> <p>2.6: 2.6 The permittee shall have the works authorized by this permit classified (and the classification shall be maintained) by the Environmental Operators Certification Program Society (Society). The works shall be operated and maintained by persons certified within and according to the program provided by the Society. Certification must be completed to the satisfaction of the Director. In addition, the Regional Manager, Environmental Protection, shall be notified of the classification level of the facility and certification levels of the operators, and changes of operators and/or operator certification levels within 30 days of any change. Alternatively, the works authorized by this permit shall be operated and maintained by persons who the permittee can demonstrate to the satisfaction of the Director, are qualified in the safe and proper operation of the facility for the protection of the environment.</p>
Details/Findings:	Mr. Ferris informed Officer Kurinka that WCFs certified operator Chris Wickam had left WCF and that a new certified operator has not been hired. Therefore, WCF has been found to be out of compliance for not having the wastewater treatment system operated and maintained by person(s) certified within and according to the EOCP program.
Compliance:	Out

Actions to be taken:	Ensure that the wastewater treatment system is operated and maintained by person(s) certified within and according to the EOCP.
Requirement Description:	2. GENERAL REQUIREMENTS, 2.8. Sludge Wasting and Disposal 2.8: 2.8 Sludge wasted from the treatment plant shall be disposed of to a site and in a manner approved by the Director, or as authorized by regulation under the Environmental Management Act.
Details/Findings:	Mr. Ferris informed Officer Kurinka that WCF has contracted Rural Septic Services to remove sludge waste from the treatment plant which is then taken to the Powell River Wildwood municipal wastewater lagoon.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.9. Groundwater Observation Facilities 2.9: 2.9 Each ground disposal field shall include 4 groundwater observation wells, and an observation port on each disposal pipe run. The location and structural details of these facilities must be satisfactory to the Director.
Details/Findings:	Officer Kurinka observed the four groundwater observation wells (Photo 6) and ports (Photo 7) on each disposal pipe run at the time of the inspection.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.10. Ground Disposal Field Operation 2.10: 2.10 Use of the disposal fields shall be alternated on a monthly basis, or at other frequencies as the Director may allow.

Details/Findings:	Mr. Ferris informed Officer Kurinka that the disposal fields are alternated on a monthly basis.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.11. Standby Facilities 2.11: 2.11 A standby area shall be set aside equivalent to 50 percent of the total installed disposal field area. The standby area is to be held in reserve for future use as a disposal field and is to be maintained free of any permanent structures.
Details/Findings:	Mr. Ferris informed Officer Kurinka that WCF still has an area equivalent to 50 percent of the total installed disposal field area as standby. At the time of the inspection, the standby area was being used as a gravel parking lot for staff vehicles.
Compliance:	In
Actions to be taken:	
Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS 3.1. Discharge Monitoring, 3.1.1 Flow Measurement 3.1.1: 3.1.1 Provide and maintain a suitable flow measuring device and record once per week the effluent volume discharged over a 24-hour period.
Details/Findings:	Mr. Ferris informed Officer Kurinka that WCF used to have a flow meter, but ran into issues with the meter being plugged with material in the wastewater. Mr. Ferris informed Officer Kurinka that the flow meter was removed and WCF calculates flow based on manufacturer specifications of the processing and sanitary equipment and the capacity of storage containers.

Compliance:	Out
Actions to be taken:	Contact a qualified professional and install a suitable flow measuring device and record once per week the effluent volume discharged over a 24-hour period.
Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS, 3.1. Discharge Monitoring 3.1.2 Grab Sampling 3.1.2: 3.1.2 A suitable sampling facility shall be installed and a grab sample of the effluent authorized by Section 1.1 shall be obtained once each quarter. Proper care should be taken in sampling, storing and transporting the samples to adequately control temperature and avoid contamination, breakage, etc.
Details/Findings:	Mr. Ferris informed Officer Kurinka that WCF obtained a grab sample of the effluent in quarter one of 2018, dated March 1, 2018. No quarterly sampling occurred in 2017.
Compliance:	Out
Actions to be taken:	Ensure that grab samples of the effluent are obtained once each quarter. The next quarterly sample should be collected by June 30, 2018.
Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS, 3.1. Discharge Monitoring 3.1.3 Analysis 3.1.3: 3.1.3 Obtain analyses of the sample for the following: 5-day Biochemical Oxygen Demand; Total Suspended Solids (nonfilterable residue)
Details/Findings:	WCF obtained analysis of the 2018 first quarter grab sample for 5-day Biochemical Oxygen Demand; and Total Suspended Solids (nonfilterable residue).
Compliance:	In
Actions to be taken:	

Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS, 3.2. Receiving Environment Monitoring 3.2.1 Grab Sampling 3.2.1: 3.2.1 A suitable sampling facility shall be installed and a grab sample of the groundwater in the monitoring well located on-site SE of the disposal field authorized by Section 1.1 shall be obtained once each year for three consecutive years, beginning 2006. The Director may require sampling to continue after 3 years if analytical results indicate that groundwater quality is deteriorating. Proper care should be taken in sampling, storing and transporting the samples to adequately control temperature and avoid contamination, breakage, etc.
Details/Findings:	Mr. Ferris informed Officer Kurinka that WCF conducted receiving environmental monitoring during the first three years of operation and have not conducted receiving monitoring after the third year. Officer Kurinka conducted a file review on March 14, 2018, and was unable to locate any additional receiving monitoring requirements required by the Director.
Compliance:	In
Actions to be taken:	
Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS, 3.4. Reporting 3.4.: 3.4 Maintain data of analyses and flow measurements for inspection and submit the data, suitably tabulated, to the Regional Manager, Environmental Protection, for the previous 6 months. The first reporting period ends June 30, 2006. All reports shall be submitted within 31 days of the end of the reporting period.
Details/Findings:	WCF has not submitted semi-annual reports as required by this section of the permit in 2017.
Compliance:	Out

Actions to be taken:	<p>Ensure that the data of analyses and flow measurements are submitted, suitably tabulated, to the Director on a semi-annual basis. The next reporting period ends June 30, 2018, and submitted no later than July 3, 2018.</p> <p>Please submit all annual/quarterly/monthly reports and data submissions to the Ministry's Routine Environmental Reporting Submission Mailbox at EnvAuthorizationsReporting@gov.bc.ca. More information about the reporting requirements may be found at http://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/routine-environmental-reporting-submission-mailbox.</p>
----------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Compliance History:

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

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

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

Below are attachments related to this inspection.

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

Yours truly,

Travis Kurinka
Environmental Protection Officer

cc:

Attachments:

1) 2018-03-13 - Photo Record - WC Fishculture.pdf Photo Record

Deliver via:

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

Ministry of Environment and Climate Change Strategy	Compliance Environmental Protection Division	Mailing Address: 2nd Fl 10470-152nd St Surrey BC V3R 0Y3	Telephone: 604 582 5200 Facsimile: 604 930 7119 Website: www.gov.bc.ca/env
------------------------------------------------------------	-------------------------------------------------	-------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------

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

To see the most up to date version of the regulations and codes of practices please visit <http://www.bclaws.ca>

If you require a copy of the original permit, please contact the inspector noted on this inspection record.

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

Authorization: 17667	Client Name: West Coast Fishculture (Lois Lake) Ltd.
NRIS IR #: 80743	(Date) Site Inspection Photos: March 13, 2018

Photo 1

Authorized
ozone separation
system located
at West Coast
Fishculture (Lois
Lake) Ltd. fish
processing plant.



Photo 2

Authorized
Sedimentation
Tank which is
part of the
secondary
treatment plant
at West Coast
Fishculutre (Lois
Lake) Ltd. fish
processing plant.



Authorization: 17667	Client Name: West Coast Fishculture (Lois Lake) Ltd.
NRIS IR #: 80743	(Date) Site Inspection Photos: March 13, 2018

Photo 3

Authorized
aeration tank at
West Coast
Fishculture (Lois
Lake) Ltd.
secondary
treatment plant.



Photo 4

The authorized
ground disposal
field with
distribution
shed in the
middle.



Authorization: 17667	Client Name: West Coast Fishculture (Lois Lake) Ltd.
NRIS IR #: 80743	(Date) Site Inspection Photos: March 13, 2018

Photo 5

Fine screen box filtering out the larger solid material out of the effluent before the effluent enters the secondary treatment plant.

The box filters are temporarily being used while the authorized effluent screens undergo maintenance.



Photo 6

One of the groundwater wells located near the ground disposal field.



Authorization: 17667	Client Name: West Coast Fishculture (Lois Lake) Ltd.
NRIS IR #: 80743	(Date) Site Inspection Photos: March 13, 2018

Photo 7

Observation ports located on pipe runs at the ground disposal field.



