



Report Date: March 13, 2018

File: 8430

Report Number: 079680

S. M. Properties Ltd.
3827 River Rd W,
Delta, BC V4K 3N2

Dear S. M. Properties Ltd.:

Re: Non-compliance Advisory Letter, Permit 8430, Delta

On February 28, 2018, Ministry of Environment and Climate Change Strategy (ENV), Environmental Protection Division staff conducted an inspection of your facility, S. M. Properties Ltd. located at 3827 River Road, Delta, BC, Fish Processing Plant with authorization number 8430 under the *Environmental Management Act* (EMA). Ministry staff were accompanied on-site by David Whittle, S.M. Properties Ltd. and Gord Nesbitt, S.M. Properties Ltd.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of S. M. Properties 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:	1. AUTHORIZED DISCHARGES, 1.1 1.1.1: 1.1 This section applies to the discharge of process effluent from a FISH PROCESSING PLANT. The site reference number for this discharge is E209878. 1.1.1 The maximum authorized rate of discharge is 25 cubic metres/d.
Details/Findings:	On February 28, 2018, Ministry of Environment and Climate Change Strategy (ENV), Environmental Protection Division staff conducted an on-site inspection of your facility, S.M. Properties Ltd. (Facility) with permit 8430 (Permit) authorized under the Environmental Management Act (EMA). Flow measurements are not required to be taken by the permittee, therefore, compliance with this requirement could not be determined.
Compliance:	Not Determined

Actions to be taken:	N/A
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.2: 1.1 This section applies to the discharge of process effluent from a FISH PROCESSING PLANT. The site reference number for this discharge is E209878. 1.1.2 The characteristics of the discharge shall be typical effluent from a fish processing plant after passing through a 25-mesh screen with a maximum sieve opening of 0.7 mm.
Details/Findings:	The facility was not in operation at the time of the inspection. However, Mr. Whittle confirmed that when in operation, the characteristics of the discharge are typical effluent from a fish processing plant after passing through the 25-mesh screen.
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.3: 1.1 This section applies to the discharge of process effluent from a FISH PROCESSING PLANT. The site reference number for this discharge is E209878. 1.1.3 The authorized works are a 25-mesh rotary screen with a maximum sieve opening of 0.7 mm and a submerged outfall, approximately located as shown on attached Site Plan A.
Details/Findings:	While on-site, Officer Fraleigh observed a 25-mesh rotary screen with a maximum sieve opening of 0.7mm and a submerged outfall.
Compliance:	In
Actions to be taken:	N/A

Requirement Description:	1. AUTHORIZED DISCHARGES, 1.2 1.2.1: 1.2 This section applies to the discharge from a FISH PACKAGING OPERATION OF A FISH PROCESSING PLANT. The site reference number for this discharge is E253870. 1.2.1 The maximum authorized rate of discharge is 4 cubic metres/ct.
Details/Findings:	Flow measurements are not required to be taken by the permittee, therefore, compliance with this requirement could not be determined.
Compliance:	Not Determined
Actions to be taken:	N/A
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.2 1.2.2: 1.2 This section applies to the discharge from a FISH PACKAGING OPERATION OF A FISH PROCESSING PLANT. The site reference number for this discharge is E253870. 1.2.2 The characteristics of the discharge shall be typical screened effluent from the packaging of whole fish (and fish without heads).
Details/Findings:	The facility was not in operation at the time of the inspection. However, Mr. Whittle confirmed that when in operation, the characteristics of the discharge are typical effluent from the packaging of whole fish (and fish without heads).
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.2 1.2.3: 1.2 This section applies to the discharge from a FISH PACKAGING OPERATION OF A FISH PROCESSING PLANT. The site reference number for this discharge is E253870. 1.2.3 The authorized works are: a) A 25-mesh screen with a maximum sieve opening of 0.7 mm or b) A screen with a maximum sieve opening of 3.2 mm if clogging by ice makes the 25-mesh screen impractical to use and a submerged outfall, approximately located as shown on attached Site Plan A.

Details/Findings:	While on-site, Officer Fraleigh observed a 25-mesh screen with a maximum sieve opening of 0.7mm and a submerged outfall.
Compliance:	In
Actions to be taken:	N/A
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. Notify the Regional Waste Manager of any malfunction of these works.
Details/Findings:	Mr. Whittle indicated that they inspect the authorized works on a daily basis when processing. All works on-site were observed to be in place and in good working order.
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	2. GENERAL REQUIREMENTS, 2.3 Process Modifications 2.3: 2.3 The Regional Waste Manager shall be notified prior to implementing changes to any process that may adversely affect the quality and/or quantity of the discharge.
Details/Findings:	No process modifications were made during 2016 and 2017. Therefore, compliance with this requirement is not applicable.
Compliance:	N/A

Actions to be taken:	N/A
Requirement Description:	2. GENERAL REQUIREMENTS, 2.4 Bypasses 2.4: 2.4 The discharge of effluent which has bypassed the authorized works is prohibited unless the approval of the Regional Waste Manager is obtained and confirmed in writing.
Details/Findings:	No bypasses occurred during 2016 and 2017. Therefore, compliance with this requirement is not applicable.
Compliance:	N/A
Actions to be taken:	N/A
Requirement Description:	2. GENERAL REQUIREMENTS, 2.6 Record of Inspection and Maintenance of Effluent Treatment Facilities 2.6: 2.6 The permittee shall keep an Inspection and Maintenance Log for Effluent Treatment Facilities. The log shall contain dates and details of inspections, problems identified, corrective actions taken, maintenance and cleanout of treatment works (e.g. repair and cleaning of effluent screens) and any other relevant information. The log shall be available for inspection.
Details/Findings:	No inspection logs for the rotary screener were made available at the time of the inspection. Mr. Whittle indicated that they would begin to record the necessary inspection details for the rotary screener in the Inspection and Maintenance Log for Effluent Treatment Facilities.
Compliance:	Out
Actions to be taken:	Please conduct regular inspections of the rotary screen and ensure the necessary inspection details are recorded in the Inspection and Maintenance Log for Effluent Treatment Facilities.

Requirement Description:	2. GENERAL REQUIREMENTS, 2.7 Solid Waste 2.7: 2.7 Solid waste removed from the effluent treatment facilities shall be recycled or disposed of in a manner acceptable to the Regional Waste Manager.
Details/Findings:	Solid waste removed from the effluent treatment facilities are collected and disposed of on a regular basis by Unican Industries Ltd. A recent manifest was provided to Officer Fraleigh during the inspection.
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	2. GENERAL REQUIREMENTS, 2.8 Sewer Connection 2.8: 2.8 The discharge authorized by this permit shall be connected to a municipal sewerage system when such facilities become available, as determined by the Regional Waste Manager.
Details/Findings:	Connection to a municipal sewerage system was not available at the time of this inspection.
Compliance:	Not Applicable
Actions to be taken:	N/A
Requirement Description:	2. GENERAL REQUIREMENTS, 2.9 Management of Stormwater/Drainage 2.9: 2.9 The permittee shall manage all stormwater/drainage by taking measures to minimize contamination. In addition, the permittee shall ensure that each discharge of contaminated stormwater/drainage from the dock area (where there is the unloading of fish which has already been gutted and cleaned prior to arrival) is treated with: a) A 25-mesh screen with a maximum sieve opening of 0.7 mm or b) A screen with a maximum sieve opening of 3.2 mm if clogging by ice makes the 25-mesh screen impractical to use.

Details/Findings:	All stormwater drainage areas from the dock area report to stormwater drains which are fitted with 25-mesh screens which have a maximum sieve opening of 0.7mm.
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS, 3.1 Discharge, Production and Water Usage Monitoring 3.1: 3.1 The permittee shall keep records of the quantity of municipal water used by the entire fish processing plant. These records shall be available for inspection. If required by the Regional Waste Manager, the permittee shall monitor the discharge (e.g. quantity and quality) and the production (e.g. weight and type of fish processed).
Details/Findings:	Records of the quantity of municipal water used by the entire fish processing plant were provided to Officer Fraleigh during the inspection.
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring 3.2: 3.2 If required by the Regional Waste Manager, the permittee shall retain a qualified professional to carry out an environmental study to the satisfaction of the Regional Waste Manager.
Details/Findings:	The Regional Waste Manager has not required any receiving environment monitoring at this time, therefore, compliance with this requirement is not applicable.
Compliance:	Not Applicable

Actions to be taken:	N/A
Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS, 3.3 Reporting 3.3: 3.3 If required by the Regional Waste Manager, the data/study from Sections 3.1 and 3.2 shall be submitted to the Regional Waste Manager.
Details/Findings:	The Regional Waste Manager has not required the data/study from Section 3.1 and 3.2, therefore, compliance with this requirement is not applicable.
Compliance:	Not Applicable
Actions to be taken:	N/A

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>.

The facility was found to be out of compliance. Please implement the necessary changes or modifications immediately to correct this situation and to bring it into compliance. Refer to the 'Actions to be taken' section of this Inspection Record for any actions that must be taken to bring this facility back into compliance (if any). Please notify this office by email at EnvironmentalCompliance@gov.bc.ca within 30 days of this letter, advising what corrective measures have been taken, and what else is being done, to bring this authorization into compliance.

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

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

Yours truly,

Connor Fraleigh

Environmental Protection Officer

cc: David Whittle, sales@halibut.ca
Gord Nesbitt, gord@halibut.ca

Attachments:

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.