



Report Date: October 17, 2017

File:1701

Report Number: 68133

Cobble Hill Holdings Ltd. (BC0754588)  
c/o Herald Street Law  
101 - 536 Herald Street  
Victoria BC V8W 1S6

Dear Named Parties (as identified in Second Amended  
Spill Prevention Order MO1701):

**Re: Warning Letter, Spill Prevention Order MO1701, 460 Stebbings Road, Shawnigan Lake (Facility)**

---

On September 27, 2017, Ministry of Environment, Environmental Protection Division staff conducted an on-site inspection of your Facility under *Environmental Management Act (EMA)*, Spill Prevention Order MO1701 (Order); dated January 27, 2017, last amended June 29, 2017. The inspection determined that the Named Parties is out of compliance with its Order and the section(s) listed below. This Warning Letter lists the compliance verification information contained below.

Failure to comply with the requirements set out in your Order is an offence under the *Environmental Management Act (EMA)*. Section 120(10) of *EMA* states as follows:

*(10) A person who contravenes an order or requirement, other than an order under section 9 (3) [hazardous waste storage and disposal] or 90.1 (1) [permits under area based management plan], that is given, made or imposed under this Act by a sewage control manager, a district director, a director, the minister or the appeal board commits an offence and is liable on conviction to a fine not exceeding \$300 000 or imprisonment for not more than 6 months, or both, but an order or requirement is not contravened unless it*

*(a) was given in writing, and*

*(b) specified a reasonable period of time for compliance and that period has expired.*

If you fail to take the necessary actions to restore compliance, you may be subject to escalating enforcement action. This Warning Letter and the alleged violations and circumstances to which it refers, will form part of the compliance history of the Named Parties (as identified in the Order) and will be taken into account in the event of future violations.

Finally, I request that the Named Parties immediately implement the necessary changes or modifications to correct the non-compliance(s) with the *Environmental Management Act*. Further, I request that the Named Parties notify this office in writing by email or letter within 30 days of this letter, advising what corrective measures have been taken, and what else is being done, to prevent similar non-compliances in the future.

Inspection Details:

Requirement Description:	<b>2017-06-29 SPO</b> 1. a: The landfill is covered completely with weighted and secured impermeable cover, and that sufficient weather protection is provided for the cover in order to ensure its effectiveness, except as needed for implementation of an approved Updated Final Closure Plan;
--------------------------	--

---

**Ministry of Environment**

Compliance  
Environmental  
Protection Division

Mailing Address:  
2080-A  
Labieux Rd  
Nanaimo BC V9E 6J9

Telephone: 250 751 3100  
Facsimile: 250 751 3103  
Website: [www.gov.bc.ca/env](http://www.gov.bc.ca/env)

Details/Findings:	On September 27, 2017, Ministry of Environment and Climate Change Strategy (ENV) Officers Connor Fraleigh and AJ Downie (Officers) conducted an on-site inspection of Cobble Hill Holdings Ltd. (BC0754588) (CHH)'s landfill cell located at 460 Stebbings Road, Shawnigan Lake (Facility). As stated in the Minister's later dated August 11, 2017 (2017-08-11 SPO Clarification Letter), only the Minor Construction Works identified in Section 4.8 of the SHA Updated Final Closure Plan V2 (Closure Plan) that was submitted to the ENV by the Named Parties on June 21, 2017, are approved. Identified in these Minor Construction Works includes alterations to the landfill cell liner. Officer Fraleigh observed the north toe of the landfill cell liner being altered (Photo 6). Since the implementation of the Minor Construction Works within the Updated Final Closure Plan were approved, compliance with this requirement is considered in.
Compliance:	In
Actions to be taken:	As soon as the Minor Construction Works are completed, the landfill cell must be covered completely with weighted and secured impermeable cover until such time that there is an approved Updated Final Closure Plan.
Requirement Description:	<b>2017-06-29 SPO</b> 1. b: All Leachate generated at the facility, including from the landfill, soil management area and wheel wash area, is collected, stored temporarily pending removal from the Facility, and transported from the Facility to an off-site facility that is authorized to treat and/or dispose of the Leachate. The collection and temporary storage of Leachate at the Facility must be <u>carried out so as to prevent an escape or spill of Leachate into the environment</u> :
Details/Findings:	Following a review of the records, it was determined that approximately 128.38 cubic metres of Leachate generated at the Facility has been transported to an off-site facility (Coast Environmental - SPL Wastewater Recovery Center Inc.) between September 15, 2017, and September 30, 2017. Copies of the disposal records were provided to the ENV via email on October 2, 2017.
Compliance:	In
Actions to be taken:	
Requirement Description:	<b>2017-06-29 SPO</b> 1. c: All works for the collection and temporary storage of Leachate generated at the Facility are <u>inspected regularly and maintained in good working order</u> ; and
Details/Findings:	Officer Fraleigh observed works for the collection and temporary storage of Leachate generated at the Facility being constructed while on-site (Photo 8). The works for the collection and temporary storage of Leachate generated at the Facility are part of the approved Minor Construction Works identified in Section 4.8 of the Closure Plan. Therefore, compliance with this requirement is not applicable.
Compliance:	Not Applicable
Actions to be taken:	Following completion of the Minor Construction Works, the works for the collection and temporary storage of Leachate generated at the Facility must be inspected regularly and maintained in good working order.
Requirement Description:	<b>2017-06-29 SPO</b> 1. d: Records of the volumes of Leachate collected, stored and transported, including the name and location of the authorized facility(ies) receiving the Leachate, are maintained and submitted to the director on or immediately before the 1st and 15th day of each month, until the Named Parties have complied with section 6 or section 11 of this order. Submissions must be made electronically to the following email inbox: <a href="mailto:EnvironmentalCompliance@gov.bc.ca">EnvironmentalCompliance@gov.bc.ca</a> .
Details/Findings:	All records of the volumes of Leachate collected, stored and transported, including the name of the authorized facility (Coast Environmental - SPL Wastewater Recovery Centre Inc.) receiving the Leachate were maintained and submitted to the ENV on August 30, 2017, September 15, 2017, and October 2, 2017, via email. A total of 128.38 cubic metres of leachate was transported off-site between September 15, 2017, and September 30, 2017.
Compliance:	In

Actions to be taken:	Please ensure that all semi-monthly report submissions continue to be sent to the EnvironmentalCompliance@gov.bc.ca email inbox.
Requirement Description:	<b>2017-06-29 SPO</b> 3: Following approval of the Updated Final Closure Plan, the Named Parties must carry out all closure activities set out in the approved Updated Final Closure Plan in accordance with any conditions of the approval. A Qualified Professional must be continuously present on-site to supervise all closure activities and must carry out the following: inspect and approve works as they are constructed for conformance with plans and specifications; perform quality assurance and quality control, including for the clay secondary liner and the geomembrane base and cover liners; perform testing, including seam and leak testing; and report to the Ministry in accordance with section 4 below. The Named Parties must carry out the closure activities in accordance with the implementation schedule in the approved Updated Final Closure Plan or such other dates as specified by the Minister.
Details/Findings:	Since the Updated Final Closure Plan has not yet been approved, compliance with this requirement is not applicable.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<b>2017-06-29 SPO</b> 4: Commencing in the month that closure activities commence pursuant to the approved Updated Final Closure Plan, the Named Parties must submit semi-monthly status reports, certified by a Qualified Professional. The reports must include the status of closure activities, inspection results, quality control and testing results, photographs which support/document the quality control and testing results, inspection reports and other supporting documents as needed to fully document all stages and components of the closure activities. Status reports must be submitted by the 15th and 30th of each month (or the next business day thereafter if the 15th or 30th of the month is not a business day) until closure activities have been completed. Submissions must be made electronically to the following email inbox: EnvironmentalCompliance@gov.bc.ca.
Details/Findings:	As stated in the 2017-08-11 SPO Clarification Letter, only the Minor Construction Works identified in Section 4.8 of the Closure Plan, dated June 21, 2017, are approved. Since the Minor Construction Works were approved and closure activities commenced pursuant to those works, the semi-monthly status reports were required to be submitted by the 15th and 30th of each month (or the next business day thereafter if the 15th or 30th of the month is not a business day) until closure activities have been completed.  A report from SHA was submitted to the ENV on August 25, 2017, (which was resubmitted on August 28, 2017, to correct an error in Table 1 of the report) and September 13, 2017, via email. As no work had begun on-site during these two reporting periods, the requirement to submit inspection results, quality control and testing results, photographs which support/document the quality control and testing results, inspection reports and other supporting documents as needed can be considered not applicable.
Compliance:	Not Applicable
Actions to be taken:	Please ensure that reports continue to be submitted to the ENV by the 15th and 30th of each month (or the next business day thereafter if the 15th or 30th of the month is not a business day) in accordance with Spill Prevention Order MO1701, until closure activities (pursuant to an approved Updated Final Closure Plan) have been completed.
Requirement Description:	<b>2017-06-29 SPO</b> 4: Commencing in the month that closure activities commence pursuant to the approved Updated Final Closure Plan, the Named Parties must submit semi-monthly status reports, certified by a Qualified Professional. The reports must include the status of closure activities, inspection results, quality control and testing results, photographs which support/document the quality control and testing results, inspection reports and other supporting documents as needed to fully document all stages and components of the closure activities. Status reports must be submitted by the 15th and 30th of each month (or the next business day thereafter if the 15th or 30th of the month is not a business day) until closure activities have been completed. Submissions must be made electronically to the following email inbox: EnvironmentalCompliance@gov.bc.ca.

**Ministry of Environment**

Compliance  
Environmental  
Protection Division

Mailing Address:  
2080-A  
Labieux Rd  
Nanaimo BC V9E 6J9

Telephone: 250 751 3100  
Facsimile: 250 751 3103  
Website: [www.gov.bc.ca/env](http://www.gov.bc.ca/env)

Details/Findings:	A report was submitted to the ENV on October 2, 2017, via email. The report included: the 2017 Minor Construction Works Schedule which outlined the closure activities to be completed up until October 2, 2017. Status updates were included for each of the Minor Construction Works closure work activities. Inspection results and quality control and testing results were summarized in the report. Photographs which support and document the quality control and testing results were provided in Appendix A of the report. Sperling Hansen Associates Ltd. (SHA) has stated that some time is needed in order to complete all of the inspection reports, graduation reports and "As-Built" but that they will all be provided in the October 15, 2017, submission.
Compliance:	In
Actions to be taken:	Please ensure that all of the necessary quality control and testing records and other supporting documents as needed to fully document all stages and components of the closure activities are provided in the next semi-monthly report submission.
Requirement Description:	<b>2017-06-29 SPO</b> 5: The Named Parties must submit complete detailed final "As-Built" plans and specifications, certified by a Qualified Professional, of any revisions to the Facility including the landfill final cover, resulting from implementing the approved Updated Final Closure Plan in accordance with any conditions of the approval, within 30 days after the works have been constructed.
Details/Findings:	As per the 2017-08-11 SPO Clarification Letter, only the Minor Construction Works identified in Section 4.8 of the Closure Plan, dated June 21, 2017, are approved. SHA stated that all Minor Construction Works that were currently being constructed on-site will have "As-Built" completed following the construction and installation and will be submitted to the ENV in the October 15, 2017, semi-monthly status report.
Compliance:	Not Applicable
Actions to be taken:	Detailed final "As-Built" plans and specifications, certified by a Qualified Professional, must be submitted to the ENV 30 days after the works are constructed. Please provide "As-Built" plans and specifications for all of the relevant Minor Construction Works that were completed on-site.
Requirement Description:	<b>2017-06-29 SPO</b> 6: Following completion of all closure activities in the approved Updated Final Closure Plan, the Named Parties must submit quarterly implementation reports to the Ministry on or immediately before the last day of March, June, September and December of each year, for the duration specified in the approved Updated Final Closure Plan. Implementation reports must include records of inspections, operations and maintenance of the Facility, records of the volumes of Leachate collected, stored and transported, including the name and location of the authorized facility(ies) receiving the Leachate, and environmental monitoring program records interpreted and certified by a Qualified Professional. Submissions must be made electronically to the following email inbox: <a href="mailto:EnvironmentalCompliance@gov.bc.ca">EnvironmentalCompliance@gov.bc.ca</a> .
Details/Findings:	As per the 2017-08-11 SPO Clarification Letter, only Minor Construction Works have been approved and the Closure Plan is still under review by the ENV. Until such a time that all closure activities in the Closure Plan have been implemented and completed, quarterly reports are not required. Therefore, compliance with this requirement is not applicable.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 1.: Construction activities for the Minor Construction Works must commence by August 28, 2017, and be completed as early as possible, and no later than October 31, 2017.
Details/Findings:	At the time of the inspection, it could not be determined whether construction activities for the Minor Construction Works commenced by August 28, 2017. However, it should be noted that in the SHA report submitted on August 28, 2017, it states that construction task number 1, 'Procurement of Materials and Mobilization', was scheduled to start on August 28, 2017. Based on the information provided, it was unable to be determined if construction activities for the Minor Construction Works commenced by August 28, 2017.
Compliance:	Not Determined

Actions to be taken:	Please ensure all construction activities for the Minor Construction Works are completed by no later than October 31, 2017.
Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 2.: A qualified professional as defined in the Landfill Criteria for Municipal Solid Waste, Second Edition, June 2016 (Qualified Professional or QP) must be continuously present on-site to supervise all Minor Construction Works activities and must carry out the following: Inspect and approve works as they are constructed for conformance with plans and specifications; Perform quality assurance and quality control monitoring and testing; and Report to the Ministry in accordance with condition 6 below.
Details/Findings:	<p>A Qualified Professional (QP) has been continuously present on-site to supervise the following Minor Construction Works activities. Hours of on-site supervision by a QP between the dates of September 19, 2017, and September 29, 2017, were provided by Sperling Hansen Associates (SHA) via email on October 5, 2017. The information provided states that SHA or Island Engineering (IE) was on-site the following days for the following period of time:</p> <p>September 19, 2017 - 5 hours SHA, 1.5 hours IE  September 20, 2017 - 3 hours IE  September 21, 2017 - 3.5 hours IE  September 22, 2017 - 1.5 hours IE  September 25, 2017 - 3.5 hours IE  September 26, 2017 - 7 hours SHA  September 27, 2017 - 9 hours SHA  September 28, 2017 - 10 hours SHA  September 29, 2017 - 1 hour SHA, 11 hours IE</p> <p>This was compared against the documented hours of QP presence and activities being completed with regards to the Minor Construction Works which were provided by Mr. Reinhard Trautmann, GHD Consulting Inc. (GHD) over the phone on October 13, 2017. The following Minor Construction Works are considered to be in compliance for this requirement:</p> <ol style="list-style-type: none"> <li>1. Install of new leachate and leak detection tanks into secondary lined lock block facility.</li> <li>2. Weld patches on existing landfill cell liner</li> <li>3. Stockpile and Cover Soil in SMA with 6 mil Poly tarps and sandbags.</li> </ol> <p>*Washing of the lock blocks was not completed based on recommendations from SHA in order to reduce leachate being generated on-site.</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 2.: A qualified professional as defined in the Landfill Criteria for Municipal Solid Waste, Second Edition, June 2016 (Qualified Professional or QP) must be continuously present on-site to supervise all Minor Construction Works activities and must carry out the following: Inspect and approve works as they are constructed for conformance with plans and specifications; Perform quality assurance and quality control monitoring and testing; and Report to the Ministry in accordance with condition 6 below.



Details/Findings:	<p>A Qualified Professional (QP) has not been continuously present on-site to supervise the following Minor Construction Works activities. Hours of on-site supervision by a QP between the dates of September 19, 2017, and September 29, 2017, were provided by Sperling Hansen Associates (SHA) via email on October 5, 2017. The information provided states that SHA or Island Engineering (IE) was on-site the following days for the following period of time:</p> <p>September 19, 2017 - 5 hours SHA, 1.5 hours IE  September 20, 2017 - 3 hours IE  September 21, 2017 - 3.5 hours IE  September 22, 2017 - 1.5 hours IE  September 25, 2017 - 3.5 hours IE  September 26, 2017 - 7 hours SHA  September 27, 2017 - 9 hours SHA  September 28, 2017 - 10 hours SHA  September 29, 2017 - 1 hour SHA, 11 hours IE</p> <p>This was compared against the documented hours of QP presence and activities being completed with regards to the Minor Construction Works which were provided by Mr. Reinhard Trautmann, GHD Consulting Inc. (GHD). The following Minor Construction Works are considered to be out of compliance for this requirement:</p> <ol style="list-style-type: none"> <li>1. Install new twin piping to leachate and leak detection storage tanks 4-5 hours of work being completed was not supervised by a QP</li> <li>2. Pump out, remove sludge, and backfill containment pond No QP on-site during the pump out of the containment pond, no QP on-site for 7.5 hours of the backfilling of the containment pond</li> <li>3. Install three Seepage Blanket Monitoring wells No QP on-site for 3 of the 4 hours of work being completed (excavating well pits)</li> <li>4. Excavate Run-on ditching No QP on-site for 3 of the 4 hours of work being completed</li> </ol>
Compliance:	Out
Actions to be taken:	Please ensure that a QP is continuously present on-site to supervise any of the remaining Minor Construction Works activities (if any).
Requirement Description:	<p><b>2017-09-18 SPO Clarification Letter Amendment</b></p> <p>3.: By September 30, 2017, the presence and integrity of the basal clay layer must be assessed and documented when a portion of the toe of the northern slope of the landfill is exposed. The Named Parties must provide notice and an opportunity for a ministry staff representative and/or other contractor designated by the Ministry to be present when the clay layer is exposed to have opportunity to assess the presence and characteristics of the basal clay layer before securing the area. As early as possible in 2018 and no later than April 30, 2018, a minimum of three (3) additional test pits must be excavated to assess and document the presence and integrity of the basal clay layer at locations agreed to by ministry staff. The Named Parties must provide notice and an opportunity for a ministry staff representative and/or other contractor designated by the Ministry to be present during the excavation and to have opportunity to assess the presence and characteristics of the basal clay layer before securing the area.</p>
Details/Findings:	Five test pits were excavated along the north (Photo 10-12), west and south side of the landfill cell to assess for the presence and integrity of the basal clay liner. A variation in the methodology was used in order to protect the integrity of the north toe of the landfill cell. The measurements of the test pits were taken by the ENV's GHD representative, Reinhard Trautmann, and ENV staff were on-site on September 27, 2017, to visually confirm the presence of the basal clay layer. Samples were taken from each test pit for grade analysis as well as permeability analysis.
Compliance:	In
Actions to be taken:	

Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 4.: The Environmental Monitoring Program must involve collection of monthly rather than quarterly samples from the surface water, groundwater and seepage blanket as identified in sections 9.4 to 9.6 of the Updated Final Closure Plan. With regard to section 9.3, leachate in the Leak Detection Tank must also be sampled monthly when liquid is present in the tank, and analyzed for the same parameters as indicated in the Leachate Tank sampling program. Monitoring must commence at existing sampling sites by August 31, 2017, and must commence at the seepage blanket monitoring wells by October 31, 2017.
Details/Findings:	Monthly monitoring did not commence at the existing sampling sites by August 31, 2017. Based on the information provided to ENV, monthly monitoring commenced in September of 2017 and was submitted to the ENV in the October 2, 2017, semi-monthly report submission. A request was made to Rahim Gaidhar (Allterra) to provide the monitoring data and to confirm whether or not the monitoring had commenced at the existing sampling sites by August 31, 2017. A response was received from Rahim Gaidhar via email on October 13, 2017, stating that monitoring had commenced with procurement of sampling supplies from the Laboratory on August 24, 2017. However, the procurement of sampling supplies does not qualify as commencing monitoring at the existing sampling sites. Therefore, it is determined to be out of compliance with this requirement.
Compliance:	Out
Actions to be taken:	In order to avoid any confusion in the future regarding the Environmental Monitoring Program requirements, please contact an ENV representative for clarification well in advance of missing any required monitoring dates. Please ensure that the remaining results of analysis for the September 25, 2017, sampling event are provided once the results have been received and that monthly monitoring continues to occur in accordance with the SPO.
Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 5.: A high water level alarm system must be installed by October 31, 2017, and remain operational in the leachate collection tank to minimize the risk of an unforeseen overflow of leachate.
Details/Findings:	The October 2, 2017, semi-monthly status report states that the installation of the high water level alarm was scheduled to be completed between October 2, 2017 and October 5, 2017. In the GHD weekly status report that was submitted to the ENV via email on October 11, 2017, it stated that the high level alarm system was installed and commissioned. In addition to this, a demonstration of the high water level alarm system being manually triggered was given to Reinhard Trautmann (GHD) and it was stated that the system had worked as designed by emailing IE and Allterra representatives.
Compliance:	In
Actions to be taken:	
Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 6. a.: Additional reporting to the Ministry must be carried out as follows: a. A detailed construction work plan and schedule must be submitted prior to commencement of construction activities, and by August 25, 2017, at the latest. The schedule must identify the timing of tasks associated with each of the Minor Construction Works, and identify the QP(s) responsible for oversight of those activities.
Details/Findings:	A detailed construction work plan and schedule was submitted to the ENV via email on August 25, 2017, prior to commencement of construction activities. A revised copy of the plans were submitted on August 28, 2017, following the identification of an error.
Compliance:	In
Actions to be taken:	The report submissions provided by SHA on August 28, 2017, and September 13, 2017, confirmed the planned activities (and the associated timing) for the next reporting cycle. All water quality results that were received from the lab during the September 15, 2017 - September 30, 2017, reporting period were provided in the October 2, 2017, semi-monthly report submission.
Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 6. b. i.: Additional reporting to the Ministry must be carried out as follows: b. In addition to including the information listed in section 4 of the SPO, the semi-monthly status reports must also: i. Identify any deviations to the construction work plan and schedule mentioned above;

Details/Findings:	Deviations that occurred to the work plan and schedule were sometimes present but not clearly identified in any of the semi-monthly report submissions between August 28, 2017, and October 2, 2017.
Compliance:	Not Determined
Actions to be taken:	Please ensure that in the future, there is a section in the semi-monthly status reports that clearly specify any deviations that occurred to the work plan.
Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 6. b. ii.: Additional reporting to the Ministry must be carried out as follows: b. In addition to including the information listed in section 4 of the SPO, the semi-monthly status reports must also: ii. Confirm the planned activities (and associated timing) for the next reporting cycle; and
Details/Findings:	The report submissions provided by SHA on August 28, 2017, and September 13, 2017, confirmed the planned activities (and the associated timing) for the next reporting cycle.
Compliance:	In
Actions to be taken:	
Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 6. b. ii.: Additional reporting to the Ministry must be carried out as follows: b. In addition to including the information listed in section 4 of the SPO, the semi-monthly status reports must also: ii. Confirm the planned activities (and associated timing) for the next reporting cycle; and
Details/Findings:	The October 2, 2017, semi-monthly report submission did not confirm the planned activities (and associated timing) for the next reporting cycle (October 1, 2017 - October 15, 2017). A schedule was only provided up until October 5, 2017.
Compliance:	Out
Actions to be taken:	Please ensure that the October 15, 2017, semi-monthly report submission includes a schedule of the planned activities for the next reporting cycle. If all of the Minor Construction Works have been completed, then please indicate this in the report.
Requirement Description:	<b>2017-08-11 SPO Clarification Letter</b> 6. b. iii.: Additional reporting to the Ministry must be carried out as follows: b. In addition to including the information listed in section 4 of the SPO, the semi-monthly status reports must also: iii. Include water quality results received from the lab during the reporting period, suitably tabulated with copies of the original lab reports.
Details/Findings:	All water quality results that were received from the lab during the September 15, 2017 - September 30, 2017, reporting period were provided in the October 2, 2017, semi-monthly report submission.
Compliance:	In
Actions to be taken:	



On September 27, 2017, Ministry of Environment and Climate Change Strategy (ENV) Officers Connor Fraleigh and AJ Downie (Officers) conducted an on-site inspection of Cobble Hill Holdings Ltd. (BC0754588) landfill cell located at 460 Stebbings Road, Shawnigan Lake (Facility).

The scope of this inspection was to assess the facility for compliance with Second Amended Spill Prevention Order MO1701 (SPO); dated January 27, 2017; last amended June 29, 2017, the Minister's letters; dated August 11, 2017, and September 18, 2017, and, associated data and correspondence for conformance with the approved Minor Construction Works under the Updated Final Closure Plan; dated July 21, 2017.

Non-compliances noted during the inspection:

SPO Section 3 - A Qualified Professional has not been continuously present on-site to supervise all Minor Construction Works.

SPO Clarification Letter Section 4 - Monthly monitoring did not commence at the existing sampling site by August 31, 2017.

SPO Clarification Letter Section 6.b. - A schedule of the planned activities for the next reporting cycle (October 1, 2017 - October 15, 2017) was not received.

Compliance History:

2017-06-15 - COS Referral - Landfill cell liner not covered completely with weighted and secured impermeable cover resulting in discharge of leachate

2017-05-18 - Warning - Leak detection piping not connected to the leak detection tank, records of Leachate volume stored on-site not provided in email submissions

2017-04-06 - Advisory - Minor issues with the landfill liner integrity noted, volumes of leachate collected being inaccurately reported

If you have any questions or require any clarification, feel free to contact me at Connor.Fraleigh@gov.bc.ca.

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

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

Yours truly,

Connor Fraleigh

Environmental Protection Officer

cc: South Island Resource Management Ltd.

South Island Aggregates Ltd.

Martin Uwe Block

Michael Kelly

Cobble Hill Holdings Ltd.

Allterra Construction Ltd.

**Attachments:**

**Deliver via:**

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

---

**Ministry of Environment**Compliance  
Environmental  
Protection DivisionMailing Address:  
2080-A  
Labieux Rd  
Nanaimo BC V9E 6J9Telephone: 250 751 3100  
Facsimile: 250 751 3103  
Website: [www.gov.bc.ca/env](http://www.gov.bc.ca/env)**DISCLAIMER:**

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

To see the most up to date version of the regulations and codes of practices please visit

<http://www.bclaws.ca>

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

<http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publically%20Viewable%20Authorizations>

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.

## NRIS Photo Record

Authorization: MO1701	Cobble Hill Holdings Ltd. near Shawnigan Lake, BC
NRIS IR #: 68133	September 27, 2017 Site Inspection Photos

Photo 1

Viewing northeast towards the landfill cell run-on ditching.



Photo 2

Viewing north towards the Soil Management Area (SMA) centered soil windrow.



Photo 3

Viewing west towards the SMA lock blocks post cleaning.





## NRIS Photo Record

Authorization: MO1701	Cobble Hill Holdings Ltd. near Shawnigan Lake, BC
NRIS IR #: 68133	September 27, 2017 Site Inspection Photos

Photo 4

Viewing southeast towards the backfilled containment pond.



Photo 5

Viewing one of the three Seepage Blanket Monitoring well pits.



Photo 6

Viewing work being done to connect the landfill cell to the Leachate conveyance and leak detection lines.





## NRIS Photo Record

Authorization: MO1701	Cobble Hill Holdings Ltd. near Shawnigan Lake, BC
NRIS IR #: 68133	September 27, 2017 Site Inspection Photos

Photo 7

Viewing the exposed leachate collection piping at the north toe of the landfill cell.



Photo 8

Viewing south towards the landfill cell and Leachate conveyance lines.



Photo 9

Viewing the leak detection piping connection at the north toe of the landfill cell.





## NRIS Photo Record

Authorization: MO1701	Cobble Hill Holdings Ltd. near Shawnigan Lake, BC
NRIS IR #: 68133	September 27, 2017 Site Inspection Photos

Photo 10

Viewing the first of three exposed basal clay layers at the north side of the landfill cell.

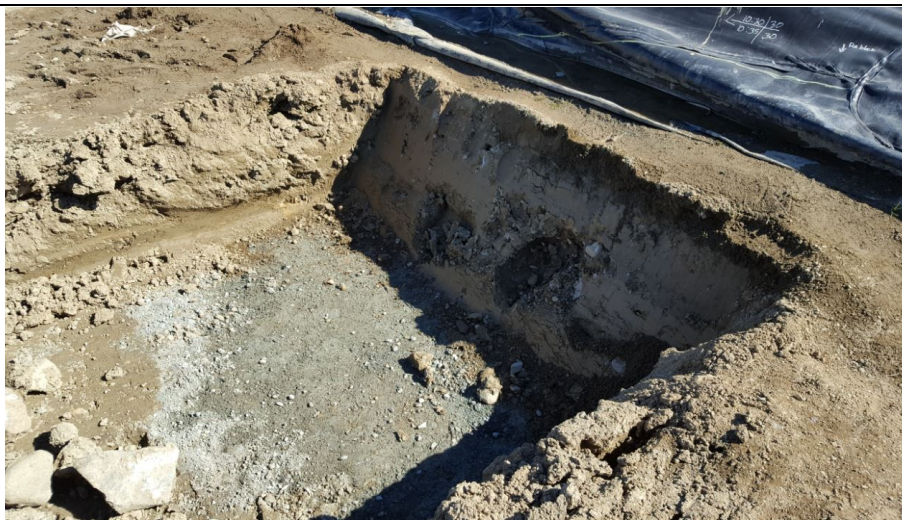


Photo 11

Viewing the second of three exposed basal clay layers at the north side of the landfill cell.



Photo 12

Viewing the last of three exposed basal clay layers at the north side of the landfill cell.





## NRIS Photo Record

Authorization: MO1701	Cobble Hill Holdings Ltd. near Shawnigan Lake, BC
NRIS IR #: 68133	September 27, 2017 Site Inspection Photos

Photo 13

Viewing north  
towards the  
Leachate  
conveyance piping.



Photo 14

Viewing north  
towards the  
two leachate  
containment  
tanks and one  
leak detection  
tank.

