



August 30, 2017

File: 105809
Reference: SPO MO1701

South Island Resource Management Ltd.
2158 Millstream Road
Victoria BC V9B 6H4
Email:
Raymond@allterraconstruction.ca
Todd@allterraconstruction.ca

Michael Kelly
A-693 Stebbings Road
Shawnigan Lake BC V0R 2W3
Email: mike.sia@shaw.ca
mike@chholdings.ca

South Island Aggregates Ltd.
Herald Street Law
101-536 Herald Street
Victoria BC V8W 1S6
Email: info@heraldstreetlaw.com

Cobble Hill holdings Ltd.
Herald Street Law
101-536 Herald Street
Victoria BC V8W 1S6
Email: info@heraldstreetlaw.com

Martin Uwe Block
A-693 Stebbing Road
Shawnigan Lake BC V0R 2W3
Email: marty.sia@shaw.ca
marty@chholdings.ca

Allterra Construction Ltd.
2158 Millstream Road
Victoria BC V9B 6H4
Email:
Raymond@allterraconstruction.ca
Todd@allterraconstruction.ca
Gary@allterraconstruction.ca

Dear Sirs:

Re: Spill Prevention Order for Cobble Hill Holdings Landfill – Minor Construction Works for 2017

This letter acknowledges the revised August 28, 2017 submission (due August 25, 2017) of the construction work plan and schedule for the Minor Construction Works. This submission was in response to the requirements of the Minister's August 11, 2017 letter.

The request to revert to sampling on a quarterly frequency is noted in the submission. As a condition for his August 11, 2017 approval of portions of the Updated Final Closure Plan, the Minister has required monthly sampling to be performed, commencing at existing sampling sites by August 31, 2017. Since the Spill Prevention Order requires

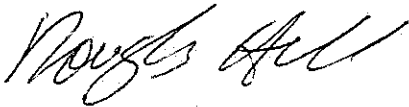
you to implement the approved Final Closure Plan “in accordance with any conditions of the approval,” in order to comply with the Spill Prevention Order, you are required to ensure sampling at a monthly frequency.

Since the July 21, 2017 Final Closure Plan submitted by Sperling Hanson Associates is in some parts conceptual, we require additional information in order to verify the adequate performance of the approved Minor Construction Works, and to assist us in the further review of the Final Closure Plan. I trust that the recently submitted work plan and schedule is supported by a “detailed construction plan” and a “quality management plan.” Please submit this additional documentation as soon as possible, and before further on-site work commences.

Further to the requirement in the August 11, 2017 letter to excavate test pits along the edge of the basal clay layer as a means to confirm the presence and suitability of the clay layer, I am aware that alternative methodology (e.g. sampling with the use of Shelby tubes) may be a suitable alternative to the excavation of test pits. Therefore, should you provide additional information regarding alternatives to test pitting, I may consider bringing that information forward to the Minister. However, at this time the requirement to provide test pit information by September 15, 2017 stands.

To date the Final Closure Plan has been updated once, with additional direction coming from the Minister. Because it appears that some activities proposed for 2017 may be impacted by subsequent activities planned for 2018, and to ensure that the Minor Construction Works Schedule is aligned with the requirements of the Spill Prevention Order, you may wish to submit a revised schedule to ensure that all steps and milestones are clearly identified as intended.

Yours truly,



Douglas Hill, P.Eng.
A/ Executive Director
Regional Operations Branch
Environmental Protection Division
Ministry of Environment and Climate Change Strategy

cc: Tony Sperling, P.Eng., Sperling Hansen Associates,
sperling@sperlinghansen.com