



Report Date: November 14, 2018

File: 1701

Report Number: 102127

Cobble Hill Holdings Ltd. (BC0754588)  
505 Fisgard Street  
Victoria BC V8W 1S6

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

**Re: Notice Letter, Second Amended Spill Prevention Order MO1701, 460 Stebbings Road, Shawnigan Lake, BC V0R 2W3**

On October 01, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an inspection of your facility, Cobble Hill Holdings (BC0754588) located at 460 Stebbings Road, Shawnigan Lake, BC V0R 2W3 under the *Environmental Management Act* (EMA), Second Amended Spill Prevention Order MO1701 (SPO), dated January 27, 2017 and last amended June 29, 2017, and the Minister's letters dated August 11, 2017 and September 18, 2017.

Requirement Description:	<p><b>2017-06-29 SPO</b></p> <p>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;</p>
Details/Findings:	<p><b>Inspection Overview</b></p> <p>On October 1, 2018, Ministry of Environment and Climate Change Strategy (ENV) Environmental Protection Officer Colin Meldrum (Officer Meldrum) conducted an office review inspection of Cobble Hill Holdings Ltd. (BC0754588) landfill cell located at 460 Stebbings Road, Shawnigan Lake (Facility). The purpose of the inspection was to verify compliance with Spill Prevention Order MO1701 (SPO), dated January 27, 2017 and last amended June 29, 2017, and the Minister's letters dated August 11, 2017 and September 18, 2017. The scope of the inspection included a review of the semi-monthly status report submissions of July 15, 2018, July 31, 2018, August 15, 2018, August 31, 2018, September 15, 2018, and September 30, 2018. The inspection period was from July 11, 2018 to September 30, 2018.</p> <p><b>Compliance Assessment</b></p> <p>The semi-monthly status reports for July 15, 2018, July 31, 2018, August 15, 2018, August 31, 2018, September 15, 2018, and September 30, 2018 included photographs and a statement that the liner appears to be in good condition and there have been no noticeable changes since the last inspection.</p>

Compliance:	In
Requirement Description:	<p><b>2017-06-29 SPO</b></p> <p>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: EnvironmentalCompliance@gov.bc.ca.</p>
Details/Findings:	Records of the volumes of leachate collected, stored and transported were maintained and submitted in the semi-monthly status reports on July 15, 2018, July 31, 2018, August 15, 2018, August 31, 2018, September 15, 2018, and September 30, 2018. The removal and transport of leachate from the Facility only took place on September 26, 2018. Records of the volumes of leachate transported, including the name and location of the authorized facility receiving the leachate were maintained and submitted in the semi-monthly status report for September 30, 2018.
Compliance:	In
Requirement Description:	<p><b>2017-06-29 SPO</b></p> <p>2. a.: The Ministry acknowledges receipt of a package of “As-Built” plans and specifications for the existing facility, and a report entitled “Cobble Hill Landfill Final Closure Plan Report” prepared by Sperling Hansen Associates Inc., dated May 31, 2017 (the “Final Closure Plan”). By July 21, 2017, the Named Parties must submit an updated version of the Final Closure Plan to the Ministry for review and approval (the “Updated Final Closure Plan”). The Updated Final Closure Plan must be certified by a qualified professional as defined in the Landfill Criteria for Municipal Solid Waste, Second Edition, June 2016 (“Qualified Professional”) and must revise the Final Closure Plan to include the following: a. a description of how leachate, and leak detection, collection and storage will be carried out during the transition from the existing leachate, and leak detection, collection and storage works to the new leachate, and leak detection, collection and storage works. If temporary collection and storage works are necessary during the transition, provide a description and details of the temporary works; The Updated Final Closure Plan may be approved by the Minister, with or without conditions.</p>
Details/Findings:	The Updated Final Closure Plan is currently being reviewed by the Ministry; therefore, compliance with this requirement and all other requirements of SPO1701 Section 2 were not assessed for the inspection period.

Compliance:	Not Determined
Requirement Description:	<p><b>2017-06-29 SPO</b></p> <p>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.</p>
Details/Findings:	The Updated Final Closure Plan has not been approved by the Ministry; therefore, compliance with this requirement is not applicable for the inspection period.
Compliance:	Not Applicable
Requirement Description:	<p><b>2017-06-29 SPO</b></p> <p>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.</p>
Details/Findings:	Semi-monthly status reports were submitted electronically for July 15, 2018, July 31, 2018, August 15, 2018, August 31, 2018, September 15, 2018, and September 30, 2018. Each semi-monthly status report was certified by a Qualified Professional with Islander Engineering Ltd. The semi-monthly status reports included inspection results, quality control and testing results and photographs.
Compliance:	In

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:	The Named Parties were previously found to be in compliance with this requirement in IR072415 for having submitted As-Built drawings certified by a Qualified Professional for the approved Minor Construction Works.  The Updated Final Closure Plan has not been approved by the Ministry; therefore, compliance with this requirement is not applicable for the inspection period.
Compliance:	Not Applicable
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: EnvironmentalCompliance@gov.bc.ca.
Details/Findings:	The Updated Final Closure Plan has not been approved by the Ministry; therefore, compliance with this requirement is not applicable for the inspection period.
Compliance:	Not Applicable
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:	<p>The semi-monthly status reports for July 15, 2018, August 15, 2018, and September 15, 2018 include the results of the monthly samples collected from the surface water (SHA-SW1 and SHA-SW2 when flowing), groundwater (MW2, MW3(S/D), and MW6) and seepage blanket (SB-1, SB-2 and SB-3 when not dry) as identified in sections 9.4 and 9.6 of the Updated Final Closure Plan.</p> <p>In addition, the semi-monthly status reports for July 15, 2018, August 15, 2018, and September 15, 2018 include the results of the monthly samples collected from the Leachate Tank (SHA-LE-1) as identified in section 9.3 of the Updated Final Closure Plan.</p>
Compliance:	In
Requirement Description:	<p><b>2017-08-11 SPO Clarification Letter</b></p> <p>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.</p>
Details/Findings:	<p>The semi-monthly status reports for July 15, 2018, July 31, 2018, August 15, 2018, August 31, 2018, September 15, 2018, and September 30, 2018 state that no monthly samples were collected from the surface water at SHA-SW2 as identified in section 9.4 of the Updated Final Closure Plan due to no flow being present.</p> <p>The semi-monthly status report for July 15, 2018, July 31, 2018, August 15, 2018, August 31, 2018, September 15, 2018, and September 30, 2018 state that no monthly samples were collected from the seepage blanket at SB-1 and SB-3 as identified in section 9.6 of the Updated Final Closure Plan due to dry conditions.</p> <p>The semi-monthly status reports for July 15, 2018, July 31, 2018, August 15, 2018, August 31, 2018, September 15, 2018, and September 30, 2018 state that no monthly samples were collected from the leak detection tank at SHA-LD-1 as identified in section 9.3 of the Updated Final Closure Plan due to dry conditions.</p>
Compliance:	Not Applicable
Actions to be taken:	Please continue to document monitoring variances due to no flow or dry conditions and ensure that monthly samples are collected when flow or leachate is present.

Requirement Description:	<p><b>2017-08-11 SPO Clarification Letter</b></p> <p>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.</p>
Details/Findings:	<p>The semi-monthly status reports for July 15, 2018, August 15, 2018, and September 15, 2018 include the results of the monthly samples from the surface water, groundwater, seepage blanket and leachate tank suitably tabulated and with copies of the original lab reports.</p>
Compliance:	<p>In</p>

**Compliance History:**

2018-07-12 IR090482 - Notice of Compliance  
2018-02-01 IR078018 - Notice of Compliance  
2017-12-04 IR072415 - Notice of Compliance  
2017-10-17 IR070056 - Notice of Compliance - All Minor Construction Works have been constructed  
2017-09-27 IR068133 - Warning - Qualified Professional not continuously present on-site, monthly monitoring did not commence by date required, minor construction works schedule not received  
2017-06-15 IR057193 - COS Referral - Landfill cell liner not covered completely with weighted and secured impermeable cover resulting in discharge of leachate  
2017-05-18 IR056323 - 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 IR052631 - Advisory - Minor issues with the landfill liner integrity noted, volumes of leachate collected being inaccurately reported

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.

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

Yours truly,

Colin Meldrum  
Environmental Protection Officer

cc:

**Attachments:**

**Deliver via:**

Email:  Fax:  Mail:   
Registered Mail:  Hand Delivery:

**Ministry of Environment  
and Climate Change  
Strategy**

Compliance  
Environmental  
Protection Division

Mailing Address:  
1259 Dalhousie Dr  
Kamloops BC V2C 5Z5

Telephone: 250 371 6200  
Facsimile: 250 371 6234  
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.

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.