



File: Spill Prevention Order MO1701

Date: March 4th, 2020

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Dear Sirs:

Re: Semi-Monthly Status Reports – Required Content

This letter is intended to reiterate and clarify the requirements of the June 29, 2017 Second Amended Spill Prevention Order (SPO) sections 3 & 4, and the June 26, 2019 Conditional Approval Letter, condition 10, with regard to the content of the semi-monthly status reports.

During closure activities (commenced December 23, 2019), the SPO and Conditional Approval Letter require:

- **SPO Section 3:** *“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...” (i.e. in the semi-monthly status reports).

- **SPO Section 4:** “...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.**”
- **Conditional Approval Letter condition 10:** “The semi-monthly status reports submitted pursuant to section 4 of the SPO must also include:
 - (a) *Identification of any deviations from the quality management plan and the construction activities work plan and implementation schedule referenced in conditions 3 and 4 of this approval;*
 - (b) **The results of inspections, repairs, quality controls and testing, in accordance with the quality management plan referenced in condition 5 of this approval;**
 - (c) *The planned activities (and associated timing) for the next reporting cycle; and*
 - (d) *The environmental monitoring program laboratory reports and tabulated results.*
 - (e) *Copies of all soil relocation documentation as required in condition 7 of this approval.*”

Accordingly, as required by the SPO and Conditional Approval Letter:

- The on-site Qualified Professional’s (QP’s) detailed reports of inspections, approvals, quality assurance and quality control, testing, etc., must be included in the semi-monthly status reports, in accordance with the SPO section 3.
- The semi-monthly status reports must be certified (i.e. sealed, signed and dated) by a QP and include the on-site QP’s detailed reports, all required content and other supporting documents as needed to fully document all stages and components of the closure activities, and all other required content, in accordance with the SPO section 4 and Conditional Approval Letter condition 10.
- As required by Conditional Approval Letter condition 1, the QP that submits the semi-monthly status report must submit a Declaration of Competency and a Conflict of Interest Disclosure Statement.

In addition, to ensure that the closure activities completed to date are adequately documented in accordance with the SPO and Conditional Approval Letter, the next semi-monthly status report must include the on-site QP’s detailed reports, and all other required content, for the closure activities completed to date including the extensions of the seepage blanket and groundwater

monitoring wells, leachate conveyance pipe valve installation, and soil placement and compaction.

The next and future semi-monthly status reports must also include inspection results/reports of all the current works. For explanatory purposes, the recent semi-monthly status reports report the condition of some of the works including the “contact water containment pond” that was decommissioned in 2017, but do not include inspection results/reports of all the current works including, for example, the leachate conveyance pipe, valve(s), leachate and leak detection storage facility and tanks, monitoring wells and seepage blanket wells.

If you have any questions or concerns, please contact AJ Downie (250-751-3176; AJ.Downie@gov.bc.ca) or Luc Lachance (250-751-3125; Luc.Lachance@gov.bc.ca).

Sincerely,

A handwritten signature in cursive script, appearing to read "Tessa Graham". The signature is written in black ink and is positioned above the typed name and title.

Tessa Graham
Executive Director, Regional Operations Branch