



Report Date: June 15, 2020

File: 1701

Report Number: 149158

Cobble Hill Holdings (BC0754588)

505 Fisgard Street  
Victoria BC V8W 1S6

Dear Named Parties (as identified in the Second Amended Spill Prevention Order MO1701),  
**Re: Non-compliance Advisory Letter, Second Amended Spill Prevention Order MO1701, 460 Stebbings Road, Shawnigan Lake, BC V0R 2W3**

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On June 01, 2020, 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 Second Spill Prevention Order MO1701, *Environmental Management Act*.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of Cobble Hill Holdings (BC0754588), 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:

On June 1, 2020, Ministry of Environment and Climate Change Strategy (Ministry) Environmental Protection Officer Colin Meldrum conducted a file 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, September 18, 2017, June 26, 2019 and October 18, 2019. The scope of the inspection included a review of the semi-monthly status report submissions of January 15, 2020, January 30, 2020, February 15, 2020, February 28, 2020, March 15, 2020, March 30, 2020, April 15, 2020, April 30, 2020, May 15, 2020 and May 30, 2020 as well as the following reports:

- Cobble Hill Landfill Final Closure Construction Quality Management Plan, prepared by Sperling Hansen Associates and dated December 13, 2019 (Quality Management Plan);
- Cobble Hill Landfill Final Closure Construction Detailed Construction Plan, prepared by Sperling Hansen Associates and dated 2019 (Detailed Construction Plan);
- Cobble Hill Landfill Closure Construction 2020, prepared by Alterra Constructions Ltd. and dated May 4, 2020 (2020 Q2 Construction Activities Work Plan and Implementation Schedule);
- Revised Limited Stage 1 Preliminary Site Investigation 765 Willing Drive, Langford, British Columbia, prepared by Pinchin Ltd. and dated March 31, 2020 (March Stage 1 PSI Report);
- Statement of Assurance Letter - CSAP Review of Soil Quality, Cobble Hill Holdings Landfill, Shawnigan Lake, BC, prepared by M.P. Jarman & Associates Ltd. and dated December 18, 2019 (December Statement of Assurance Letter);
- Statement of Assurance Letter – Soil Quality Review 765 Willing Drive, Langford, British Columbia, prepared by Pinchin Ltd. and dated March 31, 2020 (March Statement of Assurance Letter);
- Stage 1 Preliminary Site Investigation Highway 1 Admirals Road/McKenzie Avenue Interchange Saanich, BC, prepared by Islander Engineering Ltd. and dated May 2020 (May Stage 1 PSI Report);
- Statement of Assurance Letter – Review of Suspected Soil Quality, Admirals Road/ McKenzie Avenue Interchange Site Saanich, BC, Re: Cobble Hill Holdings Landfill, Shawnigan Lake, BC, prepared by M.P. Jarman & Associates Ltd. and dated May 20, 2020 (May Statement of Assurance Letter); and
- Cobble Hill Landfill Updated Environmental Monitoring Plan 2020, prepared by Sperling Hansen Associates and dated June 2, 2020 (Draft Updated EMP).

The inspection period was from January 1, 2020 to May 31, 2020.

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**Ministry of Environment  
and Climate Change  
Strategy**

Compliance  
Environmental  
Protection Division

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Requirement Description:	<b>2017-06-29 SPO</b> 1. a: The Named Parties must ensure that: 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;
Details/Findings:	Photographic evidence of the landfill covered with a weighted and secured impermeable cover was provided in the semi-monthly status reports on January 15, 2020, January 30, 2020, February 15, 2020, February 28, 2020, March 15, 2020, March 30, 2020, April 15, 2020, April 30, 2020, May 15, 2020 and May 30, 2020.
Compliance:	In
Requirement Description:	<b>2017-06-29 SPO</b> 1. b: The Named Parties must ensure that: 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 carried out so as to prevent an escape or spill of Leachate into the environment;
Details/Findings:	Records of the volumes of leachate stored at the Facility were submitted in the semi-monthly status reports on January 15, 2020, January 30, 2020, February 15, 2020, February 28, 2020, March 15, 2020, March 30, 2020, April 15, 2020, April 30, 2020, May 15, 2020 and May 30, 2020.  The semi-monthly status report for April 15, 2020 indicates that leachate was transported from the Facility to SPL Wastewater Recovery Center.
Compliance:	In
Requirement Description:	<b>2017-06-29 SPO</b> 1. c: The Named Parties must ensure that: All works for the collection and temporary storage of Leachate generated at the Facility are inspected regularly and maintained in good working order; and

Details/Findings:	<p>The volumes of leachate collected and stored were measured semi-monthly and submitted in the semi-monthly status reports on January 15, 2020, January 30, 2020, February 15, 2020, February 28, 2020, March 15, 2020, March 30, 2020, April 15, 2020, April 30, 2020, May 15, 2020 and May 30, 2020.</p> <p>A Site Inspection Report dated April 16, 2020 and prepared by Sperling Hansen Associates was submitted with the semi-monthly status report for April 30, 2020. Pictures #11 and #12 in the Site Inspection Report show evidence of the installation of a new valve on the leachate collection pipe immediately before the Leachate Storage Facility. Picture #11 states that the valve replace(sic) the existing leachate pipe valve located midway between the Leachate Storage Facility and PEA.</p> <p>Another Site Inspection Report dated May 7, 2020 and prepared by Sperling Hansen Associates was submitted with the semi-monthly status report for May 15, 2020. Pictures #1 through #5 show evidence of the installation of leachate collection pipe clean outs.</p>
Compliance:	In
Requirement Description:	<p><b>2017-06-29 SPO</b></p> <p>1. d: The Named Parties must ensure that: 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 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 the Named Parties have complied with section 5 of this order. Submissions must be made electronically to the following email inbox: EnvironmentalCompliance@gov.bc.ca.</p>
Details/Findings:	<p>Records of the volumes of leachate collected, stored and transported were maintained and submitted in the semi-monthly status reports on January 15, 2020, January 30, 2020, February 15, 2020, February 28, 2020, March 15, 2020, March 30, 2020, April 15, 2020, 2020, May 15, 2020 and May 30, 2020.</p> <p>The semi-monthly status report for April 15, 2020 indicates that 49.59 m3 of leachate was removed and transported from the Facility to SPL Wastewater Recovery Center at 995 Henry Eng Place, Langford, BC, V9B 6B2 during the reporting period.</p>
Compliance:	In

Requirement Description:	<p><b>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 1</b></p> <p>3:1: 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.</p> <p>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 1 For each submission by a Qualified Professional, if not completed in advance as per the requirement in condition 2 below, that Qualified Professional must complete, sign and submit as part of the submission a Declaration of Competency and a Conflict of Interest Disclosure Statement, which are posted on the following ministry website: <a href="https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/lawspolicies-standards-guidance/environmental-guidance-and-">https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/lawspolicies-standards-guidance/environmental-guidance-and-</a></p>
Details/Findings:	<p>The semi-monthly status reports of January 15, 2020, January 30, 2020, February 15, 2020, February 28, 2020, March 15, 2020, March 30, 2020, April 15, 2020 and April 30, 2020 were signed by Mr. Mike Achtem, PEng. Mr. Achtem submitted a signed Declaration of Competency and Conflict of Interest Disclosure Statement on March 10, 2020. Mr. Achtem submitted a revised Conflict of Interest Disclosure Statement on May 5, 2020. The May 15, 2020 and May 30, 2020 semi-monthly status reports were submitted by a Qualified Professional as per the requirement in condition 2.</p> <p>The March Statement of Assurance Letter for soil importation associated with a property located at 765 Willing Drive in Langford, BC was signed by Terry Duffy, PGeo, CSAP. Mr. Duffy submitted a signed Declaration of Competency and Conflict of Interest Disclosure Statement on April 8, 2020.</p> <p>The May Statement of Assurance Letter for soil importation associated with a property located at Admirals Road/ McKenzie Avenue Interchange Site Saanich, BC was signed by Mr. Martin Jarman, PGeo, CSAP. Mr. Jarman submitted a signed Declaration of Competency and Conflict of Interest Disclosure Statement on June 14, 2020.</p>
Compliance:	In

Requirement Description:	<p><b>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 2</b></p> <p>3:2: 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.</p> <p>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 2 Any Qualified Professional engaged to perform work in fulfillment of conditions 3, 5, 6, 8 and 11, must be approved in advance by the ministry if that Qualified Professional is different from the author of the Updated Final Closure Plan, and any approval request must be accompanied by a signed Declaration of Competency and Conflict of Interest Disclosure Statement. This requirement also applies to the Qualified Professional that must be continuously present on-site to supervise all closure activities as per section 3 in the SPO.</p>
Details/Findings:	<p>Ministry staff were present at the Facility on 68 occasions between January 1 and May 31, 2020. On those occasions, the Qualified Professional on-site supervising closure activities was one of Rahim Gaidhar, GIT, Sean Babulic, EIT or Joel Clarkston, AScT. Mr. Gaidhar submitted a signed Declaration of Competency and Conflict of Interest Disclosure Statement on December 16, 2019. Mr. Babulic submitted a signed Declaration of Competency and Conflict of Interest Disclosure Statement on December 18, 2019. Mr. Clarkson submitted a signed Declaration of Competency and Conflict of Interest Disclosure Statement on February 14, 2020.</p> <p>All other work in fulfillment of conditions 6 and 11 during the inspection period was conducted by Dr. Tony Sperling, PEng, who is the author of the Updated Final Closure Plan.</p>
Compliance:	In

Requirement Description:	<p><b>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 6 &amp; 2019-10-18 SPO Final Closure Plan Extension Letter Condition 5 &amp; Condition 6</b></p> <p>3:6,5-6: 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... 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> <p>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 6 Before the commencement of construction activities, a construction activities work plan and implementation schedule certified by a Qualified Professional must be submitted to the ministry. The construction activities work plan and implementation schedule must include a detailed description of all construction activities and identify their timing, address applicable numbered items 5 to 10, 14 and 19 in the GHD General Review and Comments – Task 5 dated March 28, 2019, and numbered item 18 in the GHD Cover System Detailed Engineering Review – Task 2 dated March 28, 2019. The work plan must identify the name(s), professional designation(s), experience, knowledge and education, of the Qualified Professional(s) who will be on site during construction, as required under section 3 of the SPO, indicating when each professional will be on site, and which professionals will be conducting which tasks. Notice must be provided to the ministry of any changes to the work plan at least 48 hours before the work is undertaken on site.</p> <p>2019-10-18 SPO Final Closure Plan Extension Letter Condition 5 An updated construction activity work plan and implementation schedule must be kept up to date and provided to the ministry on or immediately before the start of every quarter: that is, January 1, 2020; April 1, 2020; and July 1, 2020. The construction activities work plan and implementation schedule must include bi-weekly details for the next quarter.</p> <p>2019-10-18 SPO Final Closure Plan Extension Letter Condition 6 Changes to the construction activities work plan and implementation schedule and additional detail (including, but not limited to, the reasons for such changes), as appropriate, must be provided to the ministry in advance on a biweekly basis. Changes to the construction activities work plan will still require 48 hours of notice before work is undertaken on site.</p>
Details/Findings:	<p>Compliance with the requirement to submit a construction activities work plan and implementation schedule was previously assessed in Inspection Report IR143350.</p> <p>No updated construction activity work plan and implementation schedule that included bi-weekly details for the next quarter was provided to the Ministry before the start of the quarter on January 1, 2020 or April 1, 2020. The Named Parties submitted the 2020 Q2 Construction Activities Work Plan and Implementation Schedule on May 11, 2020 that included bi-weekly details for May 3, 2020 through to August 30, 2020.</p> <p>The semi-monthly status reports for January 15, 2020, January 30, 2020, February 15, 2020, February 28, 2020, March 15, 2020, March 30, 2020, April 15, 2020 and April 30, 2020 state that no changes to the construction activities work plan and implementation schedule occurred during the inspection period. The semi-monthly status reports for May 15, 2020 and May 30, 2020 note that a design modification was introduced with respect to clean outs installed on the leachate collection system, where the clean outs to the east were installed laterally and the western clean out was installed vertically. In addition, the western sub-liner leak detection clean out could not be safely located without undertaking a major excavation and damage to the bottom liner and therefore, it was determined that a single clean out on the east side of the landfill would be used to reliably clean out the entire sub liner perforated pipe using a jetting tool launched from the east clean out.</p>

Compliance:	Out
Actions to be taken:	Ensure that an updated construction activity work plan and implementation schedule that includes bi-weekly details for the next quarter is submitted on or immediately before July 1, 2020.
Requirement Description:	<p><b>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 7</b></p> <p>3:7: 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...</p> <p><b>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 7</b>  For the relocation of soil to the Land for use as final cover (stabilizing soil wedge), this approval does not provide authorization to discharge waste or serve as a contaminated soil relocation agreement(s). The relocation of soil to the Land for use as final cover is governed by the applicable provisions of the Environmental Management Act and the Contaminated Sites Regulation. The relocation of soil to the Land is also subject to the following requirements:</p> <p>(a) Before a specific quantity of soil is accepted at the Facility, the Named Parties must: i. Cause a Qualified Professional who is a member of the Contaminated Sites Approved Professionals List for Numerical Standards to characterize all soil proposed for transport to, and deposit at, the Land in accordance with the ministry's "Technical Guidance 1 on Contaminated Sites - Site Characterization and Confirmation Testing" (TG1); it is the responsibility of the Qualified Professional to fully justify and document the technical rationale for any deviations from the in-situ and ex-situ soil characterization procedures stipulated in TG1; and ii. Cause a Qualified Professional who is a member of the Contaminated Sites Approved Professionals List for Numerical Standards to prepare and sign a Statement of Assurance confirming that all soil for transport to, and deposit at, the Land has been characterized as required in 7(a) (i), and document and interpret all supporting information including sampling and analysis procedures and the quality control/assurance program.</p> <p>(b) The Named Parties must retain all the documents referred to in (a), such documents must be available for immediate inspection at the Facility by a director or an officer.</p>

Details/Findings:	<p>Compliance with this requirement related to relocation of soil from a property located at 3100 Constellation Avenue Langford, BC was previously assessed in inspection report IR143350.</p> <p>The Named Parties submitted the March Statement of Assurance Letter prepared by Mr. Terry Duffy, PGeo, who is a Contaminated Sites Approved Professional with Pinchin Ltd., on March 31, 2020 for a property located at 765 Willing Drive in Langford, BC. The March Statement of Assurance Letter documented technical rationale for deviations from the in-situ and ex-situ soil characterization procedures stipulated in TG1. The March Statement of Assurance Letter stated that the soil was being relocated from a source site that had never had any CSR Schedule 2 activities on it, and thus no APECs or PCOCs based on the results of the March Stage 1 PSI Report. The March Statement of Assurance Letter concluded that no sampling or testing of soils to meet TG1 should be required. The March Statement of Assurance Letter notes that an above ground storage tank is located at the site, but that soil in the vicinity of the tank would not be relocated. The March Statement of Assurance Letter was submitted prior to soil importation from this location, which took place starting on April 6, 2020 and continued through to May 15, 2020.</p> <p>The Named Parties submitted the May Statement of Assurance Letter prepared by Mr. Martin Jarman, PGeo, who is a contaminated Sites Approved Professional with M.P. Jarman &amp; Associates Ltd., on May 25, 2020 for a property located at Admirals Road/ McKenzie Avenue Interchange Site Saanich, BC. The May Statement of Assurance Letter documented technical rationale for deviations from the in-situ and ex-situ soil characterization procedures stipulated in TG1. The May Statement of Assurance Letter stated that the soil was being relocated from a source site that had never had any CSR Schedule 2 activities on it, and thus no APECs or PCOCs based on the May Stage 1 PSI Report. The May Statement of Assurance Letter concluded that no sampling or testing of soils to meet TG1 should be required. The May Statement of Assurance Letter was submitted for soil importation from this location, which took place starting on May 20, 2020 and continued through the end of the inspection period.</p>
Compliance:	In



Requirement Description:	<p><b>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 11</b></p> <p>3:11: 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...</p> <p>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 11 On or before December 31, 2019, a revised standalone environmental monitoring program certified by a Qualified Professional must be submitted to the ministry. The environmental monitoring program must incorporate feedback from ministry staff and include:</p> <ul style="list-style-type: none"> <li>(a) Monthly sampling at surface water site SW-1 for a minimum of 12 consecutive months following the completion of closure activities, to confirm if there are any water quality impacts due to installation of the stabilizing soil wedge at the Facility;</li> <li>(b) Revised conceptual hydrogeological model and summary;</li> <li>(c) A well installation details table for the existing and new monitoring wells. The table must detail geographical coordinates of all wells, surveyed geodetic elevation, installation depth, screen interval and geology, and water levels;</li> <li>(d) A site plan depicting all monitoring locations;</li> <li>(e) Increased recording frequency of the leachate storage tanks transducer level data;</li> <li>(f) Description of monitoring frequencies and parameters;</li> <li>(g) Description of field methods;</li> <li>(h) Quality assurance and quality control measures;</li> <li>(i) Description of water quality benchmarks, limits and triggers, and a summary of linkages between triggers and responses;</li> <li>(j) Description of all reporting objectives and deliverables;</li> <li>(k) Description of the forensic investigations that will be conducted on future water samples that report detectable concentrations of hydrocarbons. The forensic investigations must address the following key queries: i. Characterize the product; ii. Determine the source(s); iii. Evaluate the product age and degradation, if any; and iv. Describe mitigations to eliminate the source(s).</li> </ul>
Details/Findings:	<p>Compliance with the requirement to submit a revised environmental monitoring program certified by a Qualified Professional by December 31, 2019 was previously assessed in Inspection Report IR143350.</p> <p>The Ministry provided feedback in a letter dated March 12, 2020.</p> <p>On June 2, 2020, the Named Parties submitted the Draft Updated EMP. Ministry Authorizations staff and the Named Parties and their consultant conducted a meeting on June 11, 2020 to discuss the contents of the Draft Updated EMP. During the meeting, the Named Parties confirmed that they would submit the final version of the EMP the following week. Because the final version of the EMP has not yet been submitted, compliance with this requirement is not determined for the inspection period.</p>
Compliance:	Not Determined
Actions to be taken:	Ensure that the final version of the EMP is submitted to the Ministry.

Requirement Description:	<p><b>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 10</b></p> <p>4:10: 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> <p>2019-06-26 Final Closure Plan Conditional Approval Letter Condition 10 The semi-monthly status reports submitted pursuant to section 4 of the SPO must also include:</p> <ul style="list-style-type: none"> <li>(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;</li> <li>(b) The results of inspections, repairs, quality controls and testing, in accordance with the quality management plan referenced in condition 5 of this approval;</li> <li>(c) The planned activities (and associated timing) for the next reporting cycle; and</li> <li>(d) The environmental monitoring program laboratory reports and tabulated results.</li> <li>(e) Copies of all soil relocation documentation as required in condition 7 of this approval.</li> </ul>
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<p>Details/Findings:</p>	<p>Semi-monthly status reports were submitted for January 15, 2020, January 30, 2020, February 15, 2020, February 28, 2020, March 15, 2020, March 30, 2020, April 15, 2020, April 30, 2020, May 15, 2020 and May 30, 2020. Each semi-monthly status report was certified by a Qualified Professional with Islander Engineering Ltd. or Sperling Hansen Associates.</p> <p>The semi-monthly status reports included inspection results and photographs in accordance with the quality management plan.</p> <p>Testing results from samples collected from surface water, seepage blanket and groundwater wells on December 19, 2019 are presented in the January 15, 2020 semi-monthly status report. Testing results from samples collected from groundwater wells on January 21, 2020 are not included in any of the semi-monthly status reports; however, the results were sent to the Ministry in an email on January 29, 2020. Testing results from samples collected from groundwater wells on February 21, 2020 are presented in the March 30, 2020 semi-monthly status report. Testing results from samples collected from surface water, seepage blanket and groundwater wells on March 20, 2020 are presented in the April 15, 2020 semi-monthly status report. Testing results from a sample collected from surface water on April 30, 2020 are presented in the May 15, 2020 semi-monthly status report. The May 30, 2020 semi-monthly status report states that sampling occurred on May 28, 2020 and the results will be attached to the June 15, 2020 semi-monthly status report.</p> <p>The semi-monthly status reports either identify that there were no deviations from the quality management plan and the construction activities work plan or as described in Section 3, 2019-06-26 Final Closure Plan Conditional Approval Letter Condition 6, present where any deviations took place and present rationale.</p> <p>The semi-monthly status reports identify the planned activities for the next reporting cycle.</p> <p>The semi-monthly status reports that present testing results as listed above include laboratory reports and tabulated results.</p> <p>The semi-monthly status reports include soil relocation documentation or reference the appropriate December, March or May Statement of Assurance Letter previously submitted to the Ministry.</p>
<p>Compliance:</p>	<p>In</p>

**Compliance History:**

2019-12-02 IR 143350 Advisory: 7-06-29 SPO 1. d, 2019-06-26 Final Closure Plan Conditional Approval Letter Condition 6 & 2019-10-18 SPO Final Closure Plan Extension Letter Condition 5 & Condition 6 3:6,5-6, 2019-06-26 Final Closure Plan Conditional Approval Letter Condition 10 4:10

2019-07-25 IR 134299 Notice:

2019-03-14 IR 115769 Notice:

2018-10-01 IR 102127 Notice:

2018-07-04 IR 90482 Notice:

2018-02-01 IR 78018 Notice:

2017-11-16 IR 72415 Notice:

2017-10-17 IR 70056 Notice:

2017-09-27 IR 68133 Warning 120(6): 017-08-11 SPO Clarification Letter 2, 2017-08-11 SPO Clarification Letter 4; 6. b. ii

2017-06-15 IR 57193 Investigation: 1. a; b; c

2017-05-18 IR 56323 Warning 120(7): 1. c; d

2017-04-06 IR 52631 Advisory: 1. d

The Ministry of Environment Compliance and Enforcement Policy and Procedure (C&E Policy) prescribes common requirements and procedures for all Ministry staff to ensure consistent and risk-based assessment and response to non-compliance. Using the Non-Compliance Decision Matrix, the compliance determination for this inspection has been assessed as Level 1, Category B, Advisory.

More information about Environmental Compliance, the Non-Compliance Decision Matrix, and reporting and data submission requirements can be found at the links below:

General compliance information:

[www.gov.bc.ca/environmentalcompliance](http://www.gov.bc.ca/environmentalcompliance)

Non-Compliance Decision Matrix information:

[www.gov.bc.ca/environment/how-compliance-is-assessed](http://www.gov.bc.ca/environment/how-compliance-is-assessed)

Reporting and data submission requirements (to be sent to [EnvAuthorizationsReporting@gov.bc.ca](mailto:EnvAuthorizationsReporting@gov.bc.ca)):

[www.gov.bc.ca/submit-waste-authorization-reports](http://www.gov.bc.ca/submit-waste-authorization-reports)

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

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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.

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.