



Report Date: November 16, 2020

File: 1701

Report Number: 160519

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: Inspection Record, Second Amended Spill Prevention Order MO1701, 460 Stebbings Road, Shawnigan Lake, BC V0R 2W3

On November 4, 2020, Ministry of Environment and Climate Change Strategy (ENV) Environmental Protection Officer Laura Hunse conducted an onsite and office review inspection of the 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 2020 June 30, July 15, July 30, August 15, August 30, and September 15, as well as the "Construction Wrap-up Report for the Cobble Hill Holdings Landfill Closure Project" prepared by Sperling Hansen Associates and dated September 2020 (final construction report).

Raymond Lam attended the onsite portion of the inspection representing the SPO Named Parties, with ENV Regional Operations Branch (ROB) Executive Director Tessa Graham, ROB Authorizations Director Cassandra Caunce and Sr. Environmental Protection Officer Allan Leuschen in attendance as well.

The inspection period was from June 1, 2020 to November 4, 2020 and considers information from correspondence on file for that time period between ENV and the Named Parties, onsite discussions held on September 8 and November 4 2020, and follow-up correspondence to complete this report.

The non-compliance noted in this report results from a missed final construction activities completion deadline, due to revisions necessarily carried out on the advice of the Qualified Professional. The Named Parties are expected to follow the guidance of the Qualified Professionals, and the resulting deadline non-compliance does not result in an increased risk to the environment nor does it in any way indicate a lack of willingness to comply with requirements.

Requirement Description:	2017-06-29 SPO 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;
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Details/Findings:	<p>The completed landfill cover is constructed to be impermeable with works incorporated into the design to ensure sufficient weather protection to ensure its effectiveness. The final construction report includes Engineer Certification that all projects at the Cobble Hill Holdings Landfill have been constructed in general accordance with the project requirements (see Photo 1, site overview).</p> <p>New growth on the recently hydroseeded slopes and absence of erosion or gullyng despite recent precipitation was observed during the onsite inspection.</p>
Compliance:	In
Requirement Description:	<p>2017-06-29 SPO</p> <p>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;</p>
Details/Findings:	<p>Records of the volumes of leachate stored at the Facility were submitted in the semi-monthly status reports for 2020 June 30, July 15, July 30, August 15, August 30, and September 15.</p> <p>Inspection follow-up correspondence from Sperling Hansen indicates that 75.6 m3 of leachate was removed and transported from the Facility to SPL Wastewater Recovery Center at 995 Henry Eng Place, Langford, BC, V9B 6B2 over 3 shipments between October 12 to 16, 2020.</p>
Compliance:	In
Requirement Description:	<p>2017-06-29 SPO</p> <p>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</p>

Details/Findings:	<p>The semi-monthly status reports include leachate volumes for each reporting period as well as regular inspection findings and maintenance reports.</p> <p>Volume of leachate in the tanks at the time of inspection, obtained remotely on his cellular phone onsite by Mr. Lam and confirmed to Officer Hunse post-inspection by Sperling Hansen Associates by request, was approximately 21.3 m3 collected in the two tanks on November 4 (see photo 6).</p>
Compliance:	In
Actions to be taken:	The post-closure inspection and maintenance plan going forward is detailed in the "Cobble Hill Landfill Updated Environmental Monitoring Plan 2020" prepared by Sperling Hansen Associates, June 24, 2020.
Requirement Description:	<p>2017-06-29 SPO</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:	Semi-monthly reports including the required information were submitted up to and including September 15, 2020, after which time section 5 requirements were satisfied with the submission of the final construction report (see below).
Compliance:	In
Requirement Description:	<p>2017-06-29 SPO</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:	Submissions for this reporting period include those submitted for June 15, June 30, July 15, July 30, August 15, August 30, and September 15 and meet the requirements listed in the condition above.
Compliance:	In
Requirement Description:	2017-06-29 SPO 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 final construction report, "Construction Wrap-up Report for the Cobble Hill Holdings Landfill Closure Project" prepared by Sperling Hansen Associates and dated September 2020, was submitted via email to ENV on September 30, 2020, within 30 days of completion of all construction activities in early September. The final construction report includes each of the specifics as detailed in the above condition. Photos 2 - 4 illustrate some revisions as recommended by the Qualified Professional, including altered south toe drainage trench, new leachate conveyance pipe valve, and check dams installed along south surface water ditch.
Compliance:	In
Requirement Description:	2017-06-29 SPO 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:	Completion of closure activities was confirmed in the final construction report submitted on September 30, 2020. The first quarterly implementation report is due on or immediately before December 31, 2020. Compliance with this condition is not yet applicable.

Compliance:	Not Applicable
Requirement Description:	2019-06-26 SPO Final Closure Plan Letter 4: The existing non-hazardous contaminated soil in the soil management area with an estimated tonnage and volume of approximately 3,360 tonnes and 1,867 m3 respectively, is authorized to be relocated and discharged in the landfill. No other soils or waste may be discharged into the encapsulated landfill.
Details/Findings:	The non-hazardous contaminated soil in the soil management area was relocated and discharged to the landfill in July, 2020 (See Photo 5 - decommissioned soil management area).
Compliance:	In
Requirement Description:	2019-06-26 SPO Final Closure Plan Letter 9: Construction activities for implementation of the Updated Final Closure Plan must be completed on or before October 31, 2019, or alternate date approved by the ministry. Construction activities must be completed in accordance with the quality management plan and the construction activities work plan and implementation schedule referenced in conditions 5 and 6 of this approval.
Details/Findings:	The Minister's Conditional Approval Letter dated October 18, 2019, approved an alternate date of August 31, 2020, for the completion of construction activities. Construction was substantially completed ahead of schedule on August 28, 2020, and inspected by the Qualified Professional on September 2, 2020. Final alterations as recommended by the Qualified Professional for any deficiencies were complete by September 10, 2020. The final construction report, including final revisions and updated plans, was submitted to the ministry via email on September 30, 2020. The Named Parties are not in compliance with the August 31, 2020 date for final completion due to (necessarily) carrying out final revisions as recommended by the Qualified Professional in early September; however, it is acknowledged that this technical non-compliance does not result in increased risk to the environment nor does it indicate a lack of willingness to comply on the part of the Named Parties.
Compliance:	Out

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,

Laura Hunse
Environmental Protection Officer

Attachments: Photos

Deliver via:
Email: Fax: Mail:
Registered Mail: Hand Delivery:

Compliance History:

2020-06-01 IR 149158 Advisory: 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
2019-12-02 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:
2018-07-04 IR 90482 Notice:
2018-10-01 IR 102127 Notice:
2018-02-01 IR 78018 Notice:
2017-11-16 IR 72415 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
2017-04-06 IR 52631 Advisory: 1. d
2017-06-15 IR 57193 Investigation: 1. a; b; c
2017-05-18 IR 56323 Warning 120(7): 1. c; d
2017-10-17 IR 70056 Notice:

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 A, Advisory.

Ministry of Environment and Climate Change Strategy	Compliance	Mailing Address:	Telephone: 250 751 3100
	Environmental	2080-A	Facsimile: 250 751 3103
	Protection Division	Labieux Rd Nanaimo BC V9E 6J9	Website: 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.

MO1701	Named Parties
NRIS IR #: 160519	November 4, 2020 Site Inspection Photos

Photo 1
Overview,
closed landfill,
facing south



Photo 2
Revised south
toe drainage
trench



MO1701	Named Parties
NRIS IR #: 160519	November 4, 2020 Site Inspection Photos

Photo 3
New leachate conveyance pipe valve



Photo 4
Check dams installed along south surface water ditch



MO1701	Named Parties
NRIS IR #: 160519	November 4, 2020 Site Inspection Photos

Photo 5

Former soil management area



Photo 6

Screenshot of remote monitoring of leachate tanks levels. 3.45 ft corresponds to 10.67 m3 in each tank; two tanks total volume is 21.34 at time of recording

