



Report Date: May 04, 2017

File: 15087

Report Number: 053204

Mount Polley Mining Corporation

Box 12  
Likely BC V0L1N0

Dear Mount Polley Mining Corporation

**Re: Non-compliance Advisory Letter, Permit 15087, Mount Polley Mine, Air**

On April 12, 2017, Ministry of Environment, Environmental Protection Division staff conducted an inspection of your facility, Mount Polley Mining Corporation located at Mount Polley Mine with authorization number 15087 under the *Environmental Management Act*. Ministry staff were accompanied on site by Doug Ablett, Mount Polley Mining Corporation.

Failure to comply with the terms and conditions set out in your authorization is an offence under the *Environmental Management Act* (EMA).

A person who fails to comply with a provision of EMA may be found guilty of an offence and could be liable, on summary conviction, to a penalty. For your reference, EMA and all related and pertinent British Columbia Laws can be found at <http://www.bclaws.ca/>.

It should also be noted that, as an alternative to prosecution of the offence mentioned above, the Ministry may initiate action to impose an administrative penalty against Mount Polley Mining Corporation. The *Administrative Penalties Regulation (EMA)* (B.C. Reg. 133/2014) (APR) was brought into force in 2014. The APR describes the prescribed provisions of the *EMA* as well as that of specified regulations under which administrative penalties can be assigned.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of Mount Polley Mining Corporation, 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:

Requirement Description:	<b>1. AUTHORIZED DISCHARGES, 1.1</b> 1.1.1: This subsection applies to the discharge of air contaminants from an ASSAY LAB. The site reference number for this discharge is E226947. 1.1.1 The maximum authorized rate of discharge is 480 m3/min.
Details/Findings:	There is no permit requirement to monitor the rate of discharge from the Assay Lab, therefore compliance with this section cannot be determined.
Compliance:	Not Determined
Actions to be taken:	
Requirement Description:	<b>1. AUTHORIZED DISCHARGES, 1.1</b> 1.1.3: This subsection applies to the discharge of air contaminants from an ASSAY LAB. The site reference number for this discharge is E226947. 1.1.3 The authorized works are an acid gas scrubber, 2 wet scrubbers, and related appurtenances approximately located as shown on attached Site Plan A.

**Ministry of Environment**

Compliance  
Environmental  
Protection Division

Mailing Address:  
400-640 Borland St  
Williams Lake BC V2G 4T1

Telephone: 250 398 4530  
Facsimile: 250 398 4214  
Website: [www.gov.bc.ca/env](http://www.gov.bc.ca/env)

Details/Findings:	All authorized works listed were in place and operational at the time of inspection.  The Assay Lab discharges through the acid gas scrubber. The remaining two wet scrubbers treat the discharges specified in sections 1.2 (Reagent Mixing and Storage Tank Vents) (see Figure 1) and 1.3 (Crusher and Screening Plant). Each authorized discharge should have a list of the authorized works associated with that specific discharge, listed in the appropriate section of the permit. This should be addressed as part of the next permit amendment.
Compliance:	In
Actions to be taken:	Ensure a list of authorized works specific to each section are included for each authorized discharge, as part of the next permit amendment.
Requirement Description:	<b>2. GENERAL REQUIREMENTS, 2.2 Maintenance of Works and Emergency Procedures</b> 2.2: The Permittee shall inspect the pollution control works regularly and maintain them in good working order. In the event of an emergency or condition beyond the control of the Permittee which prevents continuing operation of the approved method of pollution control, the Permittee shall notify the Regional Waste Manager or an Officer designated by the Regional Waste Manager: (a) by telephone if the condition occurs between the hours of 08:00 and 16:30, Monday to Friday on normal working days; and, (b) by facsimile transmission (398-4296) if the condition occurs at any other time. All such reports must be received within 24 hours of detection of the occurrence. In addition, emergencies involving spills to the environment (as defined in the Spill reporting Regulation), or spills to the effluent treatment facilities that have the potential to impair the treatment process, shall be reported immediately to the Provincial Emergency Program (1-800-663-3456).
Details/Findings:	During the inspection, Doug reported that there is a weekly scheduled maintenance conducted on each of the three scrubbers. The scheduled maintenance inspections cover all fans, sprays, valves, filters and the electrical sensor on the flow meter. The scrubbers are checked on a weekly basis by the operations department, and bi-weekly by the maintenance department.
Compliance:	In
Actions to be taken:	
Requirement Description:	<b>2. GENERAL REQUIREMENTS, 2.2 Maintenance of Works and Emergency Procedures</b> 2.2: The Permittee shall inspect the pollution control works regularly and maintain them in good working order. In the event of an emergency or condition beyond the control of the Permittee which prevents continuing operation of the approved method of pollution control, the Permittee shall notify the Regional Waste Manager or an Officer designated by the Regional Waste Manager: (a) by telephone if the condition occurs between the hours of 08:00 and 16:30, Monday to Friday on normal working days; and, (b) by facsimile transmission (398-4296) if the condition occurs at any other time. All such reports must be received within 24 hours of detection of the occurrence. In addition, emergencies involving spills to the environment (as defined in the Spill reporting Regulation), or spills to the effluent treatment facilities that have the potential to impair the treatment process, shall be reported immediately to the Provincial Emergency Program (1-800-663-3456).
Details/Findings:	During the discussions with the operator, it was mentioned that during the winter, the water in the wet scrubber is prone to freezing. With no water in the system, wet scrubber can no longer treat the discharge. When the water freezes, the operator confirmed that the discharge continues, without treatment. Such an occurrence would be considered a condition beyond the control of the Permittee which prevents continuing operation of the approved method of pollution control. Despite this, the Ministry has not received notification of any of these events.
Compliance:	Not Determined

Actions to be taken:	<p>In the event of a condition beyond the control of the Permittee which prevents continuing operation of the approved method of pollution control, (e.g. water in the wet scrubber freezes) the Permittee must notify the Director.</p> <p>Provide confirmation of the dates, since 1 October 2016, that the wet scrubber on the Crusher and Screening Plant was not in operation due to freezing temperatures, and whether the discharge continued at that time.</p> <p>Provide an action plan, including timeline, detailing what steps will be taken to address the issue of operating the wet scrubber at low temperatures. This action plan should include any changes to the current standard operating procedure regarding notification to the Director in the event of a condition beyond the control of the Permittee which prevents continuing operation of the approved method of pollution control, and any proposed modifications to site infrastructure to address the issue of the wet scrubber freezing.</p>
Requirement Description:	<p><b>2. GENERAL REQUIREMENTS, 2.5 Fugitive Dust Control</b></p> <p>2.5: The Permittee shall suppress fugitive dust created within the operation area. Any measured dustfall data shall be compared to the Ministry Objective value of 2.9 mg/dm<sup>2</sup>/d. If measured ambient air quality compares unfavourably to the Objective value, the Regional Waste Manager will evaluate the sensitivity of the receiving environment, the contribution of the Permittee's dustfall sources to the measured ambient values, plus any other pertinent information and may, at his discretion, require the Permittee to implement additional control measures on fugitive dust sources.</p>
Details/Findings:	<p>During the inspection of the Mill, Doug reported that MPMC are looking to implement improved dust suppression techniques on the ore stock piles. To date, misters and vaporizers have been utilized to minimise fugitive dust generation. Within the next 2 months, Doug reported that they will start applying a new dust suppressant to the piles that creates a crust on the material, reducing mobilization of particulate by wind.</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p><b>2. GENERAL REQUIREMENTS, 2.5 Fugitive Dust Control</b></p> <p>2.5: The Permittee shall suppress fugitive dust created within the operation area. Any measured dustfall data shall be compared to the Ministry Objective value of 2.9 mg/dm<sup>2</sup>/d. If measured ambient air quality compares unfavourably to the Objective value, the Regional Waste Manager will evaluate the sensitivity of the receiving environment, the contribution of the Permittee's dustfall sources to the measured ambient values, plus any other pertinent information and may, at his discretion, require the Permittee to implement additional control measures on fugitive dust sources.</p>
Details/Findings:	<p>During the inspection, some dust was observed emitting from the Crusher and Screening Plant stack (see Figure 2).</p> <p>Some fugitive dust generation was observed on the Tailings Storage Facility (TSF) (see Figure 4). During the site inspection, Colleen reported that the sprinklers would be recovered from the TSF this year, citing limited effectiveness and safety issues, with the area influenced by the sprinklers becoming over saturated. Such steps will require the Fugitive Dust Control Plan to be updated to reflect changes in practices.</p>
Compliance:	Out
Actions to be taken:	

**COMPLIANCE HISTORY**

2016-06-14 IR28990 - Notice of Compliance.  
2015-08-19 IR21927 - Advisory of Non-Compliance. Failure to suppress fugitive dust within the operational area.  
2013-06-19 IR10383 - Notice of Compliance.  
2012-11-20 IR7187 - Notice of Compliance.

Please be advised that this inspection report will be published on the provincial government website in 7 days.

Below are attachments related to this inspection.

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

Yours truly,

Jack Green  
Environmental Protection Officer

cc:

**Attachments:**

1) 2017-04-12 MPMC Inspection Photos.pdf Inspection Photos

**Deliver via:**

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

<b>Ministry of Environment</b>	Compliance Environmental Protection Division	Mailing Address: 400-640 Borland St Williams Lake BC V2G 4T1	Telephone: 250 398 4530 Facsimile: 250 398 4214 Website: <a href="http://www.gov.bc.ca/env">www.gov.bc.ca/env</a>
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**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 or visit:  
<http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publically%20Viewable%20A%20uthorizations>

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.

## Ministry of Environment - Photo Record Sheet

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Figure 1. Wet scrubber treating emissions from the Reagent Mixing and Storage Tank Vents.



Figure 2. Fugitive dust emitting from the Crusher and Screening Plant discharge.





## Ministry of Environment - Photo Record Sheet

PA15087	Mount Polley Mining Corporation
April 12, 2017	Mount Polley Mine

Figure 3. Discharge from the Crusher and Screening Plant. According to staff, in winter the wet scrubber is prone to freezing, resulting in an untreated discharge. Note the staining on the building, caused by the discharge.



Figure 4. Wind blown fugitive dust generation on the TSF.



Document : 2017-04-12 MPMC Inspection Photos.pdf

Document comment: Inspection Photos