



Report Date: March 07, 2018

File: 13221

Report Number: 079200

Englewood Packing Company Ltd.

Attn: Richard Opala

#124 - 1334 Island Highway

Campbell River BC V9W 8C9

Dear Englewood Packing Company Ltd.:

Re: Non-compliance Advisory Letter, Permit 13221, Englewood Marine, Beaver Cove

On February 20, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an inspection of your facility, Englewood Packing Company Ltd. located at Englewood Marine, Beaver Cove with authorization number 13221 under the *Environmental Management Act*. Ministry staff were accompanied on site by Richard Opala, Marine Harvest; Adam McFee, Marine Harvest; Jesse Shields, Englewood Marine.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of Englewood Packing Company Ltd., 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:	1. AUTHORIZED DISCHARGES, 1.1 1.1.1: This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT carrying out dressing of salmon. The site reference number for this discharge is E222080. 1.1.1 The maximum authorized rate of discharge is 23 m3/d of fish processing plant effluent and 2.3 m3/d of domestic sewage.
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Details/Findings:	<p>On February 20, 2018, BC Ministry of Environment and Climate Change Strategy (ENV) Environmental Protection Officer Darren Stewart (Officer Stewart) inspected Englewood Packing Company Ltd., dba Englewood Marine, for compliance with its fish processing plant effluent discharge permit PE-13221. Permit 13221 was originally issued on October 23, 1995 and last amended on August 13, 1996.</p> <p>Mr. Opala informed Officer Stewart that Englewood Marine is no longer a fish processing facility and is currently acting as a warehouse, storage and maintenance facility with bunkhouse capacity for staff and vessel crew lodging.</p> <p>Officer Stewart observed an email notification on record with ENV from Englewood Packing Company dated March 30, 2007 stating in part that, "I am writing to inform you that Englewood will be closing its process operations as of June 30, 2007".</p> <p>Mr. Opala confirmed that while fish processing effluent had ceased in 2007, domestic sewage discharges from washroom facilities at Englewood Marine have continued.</p> <p>Officer Stewart observed no flow measurement device at Englewood Marine and Mr. Shields confirmed there is no measurement of flow discharges, therefore compliance with this requirement was not determined.</p>
Compliance:	Not Determined
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.1</p> <p>1.1.2: This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT carrying out dressing of salmon. The site reference number for this discharge is E222080. 1.1.2 The characteristics of the discharge shall be equivalent to or better than fine screened fish processing plant effluent, and, domestic sewage with characteristics that shall not exceed: 5-Day Biochemical Oxygen Demand - 45 mg/L Total Suspended Solids - 60 mg/L</p>
Details/Findings:	<p>Officer Stewart observed no sample results of the discharge on file with ENV for the last 10 years.</p> <p>Effluent monitoring results provided by Englewood Marine upon request from Officer Stewart post-inspection showed the following exceedance: October 09, 2017 - BOD: 183 mg/L</p>
Compliance:	Out

Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.2: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT carrying out dressing of salmon. The site reference number for this discharge is E222080. 1.1.2 The characteristics of the discharge shall be equivalent to or better than fine screened fish processing plant effluent, and, domestic sewage with characteristics that shall not exceed: 5-Day Biochemical Oxygen Demand - 45 mg/L Total Suspended Solids - 60 mg/L
Details/Findings:	Officer Stewart observed no effluent characteristic exceedances in data provided by Englewood Marine for sample dates: November 11, 2015, June 05, 2016 and September 20, 2016.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.2: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT carrying out dressing of salmon. The site reference number for this discharge is E222080. 1.1.2 The characteristics of the discharge shall be equivalent to or better than fine screened fish processing plant effluent, and, domestic sewage with characteristics that shall not exceed: 5-Day Biochemical Oxygen Demand - 45 mg/L Total Suspended Solids - 60 mg/L
Details/Findings:	Officer Stewart requested effluent monitoring results from Englewood Marine for the three years prior to the date of inspection. Data from four sample events occurring in 2015, 2016 and 2017 (November 11, 2015, June 05, 2016, September 20, 2016 and October 09, 2017) were provided post-inspection. Section 3.2 of Permit 13221 requires sampling of the effluent every three months (quarterly), therefore compliance with this requirement was not determined for eight of the 12 required quarterly sample events occurring between 2015-2017.
Compliance:	Not Determined

Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.3: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT carrying out dressing of salmon. The site reference number for this discharge is E222080. 1.1.3 The authorized works are 35-mesh fine screen (0.50 mm apertures) for the fish processing plant effluent, a secondary sewage treatment plant for the domestic sewage, an outfall extending approximately 150 m from mean low water to a minimum depth of 30 m below mean low water, and related appurtenances approximately located as shown on attached Site Plan A.
Details/Findings:	Officer Stewart observed a secondary sewage treatment plant for the domestic sewage on-site at Englewood Marine and a discharge outfall under the water along side of the dock.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.3: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT carrying out dressing of salmon. The site reference number for this discharge is E222080. 1.1.3 The authorized works are 35-mesh fine screen (0.50 mm apertures) for the fish processing plant effluent, a secondary sewage treatment plant for the domestic sewage, an outfall extending approximately 150 m from mean low water to a minimum depth of 30 m below mean low water, and related appurtenances approximately located as shown on attached Site Plan A.
Details/Findings:	Mr. Opala confirmed all works related to fish processing (a 35-mesh fine screen (0.50 mm apertures) had been removed years ago with the cessation of fish processing, therefore compliance with this part of the requirement was not applicable.
Compliance:	Not Applicable

Actions to be taken:	Amend and update your authorization to be reflective of current activities and authorized works at Englewood Marine. https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/change-authorizations
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 1.1.6: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT carrying out dressing of salmon. The site reference number for this discharge is E222080. 1.1.6 The location of the point of discharge is Beaver Cove.
Details/Findings:	Officer Stewart observed an outfall with a reported discharge terminus within the waters of Beaver Cove.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.1 Maintenance of Works 2.1: The permittee shall inspect the pollution control works regularly and maintain them in good working order. Notify the Regional Waste Manager of any malfunction of these works.
Details/Findings:	Mr. Opala informed Officer Stewart that Mr. Lorne Sandberg was the on-site contracted operator for the sewage treatment system and responsible for the inspection and maintenance of the pollution control works. Officer Stewart confirmed with Mr. Sandberg that the pollution control works are inspected quarterly.
Compliance:	In
Actions to be taken:	

Requirement Description:	2. GENERAL REQUIREMENTS, 2.3 Bypasses 2.3: The discharge of effluent which has bypassed the designated treatment works is prohibited unless the approval of the Regional Waste Manager is obtained and confirmed in writing.
Details/Findings:	Mr. Opala confirmed with Officer Stewart that there have been no bypasses during the inspection period covered by this report, therefore compliance with this requirement was not applicable.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.5 Plans - New Works 2.5: Plans and specifications of the secondary sewage treatment plant authorized in Subsection 1.1.3 shall be sealed by a professional engineer or geoscientist licensed to practice in the province of British Columbia and shall be submitted to the Regional Waste Manager and the manager's approval obtained before construction commences. The secondary sewage treatment plant shall be constructed in accordance with such plans.
Details/Findings:	Officer Stewart could not locate any plans and specifications of the secondary sewage treatment plant authorized in Subsection 1.1.3 submitted to ENV nor any indication of the Regional Waste Manager's approval, therefore compliance with this requirement was not determined. It is unknown if the secondary sewage treatment was constructed in accordance with such plans, as Officer Stewart could locate no plans submitted to ENV for the sewage treatment plant.
Compliance:	Not Determined
Actions to be taken:	

Requirement Description:	2. GENERAL REQUIREMENTS, 2.6 Posting of Outfall 2.6: The permittee shall erect a sign along the alignment of the outfall above high water mark. The sign shall identify the nature of the works. The wording and size of the sign requires the approval of the Regional Waste Manager.
Details/Findings:	Officer Stewart observed no outfall sign along the alignment of the outfall above high water mark.
Compliance:	Out
Actions to be taken:	Install the necessary outfall sign identifying the nature of the works, as required by this section.
Requirement Description:	2. GENERAL REQUIREMENTS, 2.7 Outfall Inspection 2.7: The permittee shall conduct a dye test on the outfall line (or inspect by another method approved by the Regional Waste Manager) every two years or as may otherwise be required by the Regional Waste Manager.
Details/Findings:	Mr. Opala informed Officer Stewart that an outfall inspection was done in 2015 or 2016. Officer Stewart requested a copy of the outfall inspection report to confirm its completion however it was not provided by the date of this report, therefore compliance with this requirement was not determined.
Compliance:	Not Determined
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2. Bloodwater and Solid Waste Disposal 2.8: Bloodwater, screenings and other solid wastes from this facility, including sludge wasted from the secondary sewage treatment plant, shall be disposed of to a site and in a manner approved by the Regional Waste Manager.

Details/Findings:	Mr. Shields informed Officer Stewart that sludge wasted from the secondary sewage treatment plant is removed via contracted pumper truck and disposed at an off-site facility.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.9 Water Conservation Practices 2.9: The permittee is encouraged to practice water conservation in the design and operation of the fish processing plant. Water conservation methods such as dry transporting and cleaning, low-flow nozzles, vacuum hoses, spring loaded shut-off valves, waste stream separation including installation of collection chutes and trays for offal and blood and by-product recovery, etc., are recommended.
Details/Findings:	Upon cessation of fish processing activities, water conservation methods are no longer pertinent, therefore compliance with this requirement is currently not applicable.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.10 Facility Classification and Operator Certification 2.10: The permittee shall have the secondary sewage treatment plant authorized by this permit classified (and the classification shall be maintained) by the "Environmental Operators Certification Program Society" (Society). The secondary sewage treatment plant shall be operated and maintained by persons certified within and according to the program provided by the Society. Certification must be completed to the satisfaction of the Regional Waste Manager. In addition, the Regional Waste Manager shall be notified of the classification level of the facility and certification level of the operators, and changes of operators and/or operator certification levels within 30 days of any change. Alternatively, the secondary sewage treatment plant authorized by this permit shall be operated and maintained by persons who the permittee can demonstrate to the satisfaction of the Director, are qualified in the safe and proper operation of the facility for the protection of the environment.

Details/Findings:	The Englewood Marine secondary sewage treatment plant authorized by this permit has not maintained classification by the "Environmental Operators Certification Program Society" (Society).
Compliance:	Out
Actions to be taken:	Have the secondary sewage treatment plant authorized by this permit classified (and maintain the classification) by the "Environmental Operators Certification Program Society" (Society).
Requirement Description:	2. GENERAL REQUIREMENTS, 2.10 Facility Classification and Operator Certification 2.10: The permittee shall have the secondary sewage treatment plant authorized by this permit classified (and the classification shall be maintained) by the "Environmental Operators Certification Program Society" (Society). The secondary sewage treatment plant shall be operated and maintained by persons certified within and according to the program provided by the Society. Certification must be completed to the satisfaction of the Regional Waste Manager. In addition, the Regional Waste Manager shall be notified of the classification level of the facility and certification level of the operators, and changes of operators and/or operator certification levels within 30 days of any change. Alternatively, the secondary sewage treatment plant authorized by this permit shall be operated and maintained by persons who the permittee can demonstrate to the satisfaction of the Director, are qualified in the safe and proper operation of the facility for the protection of the environment.
Details/Findings:	Mr. Opala informed Officer Stewart that the secondary sewage treatment plant is operated and maintained by Lorne Sandberg from H2Ops, who is certified with the Society (certification #4357).
Compliance:	In
Actions to be taken:	

Requirement Description:	2. GENERAL REQUIREMENTS, 2.12 Effluent Upgrading 2.12: Based on receiving environment monitoring data and/or other information obtained in connection with this discharge, the permittee may be required to provide additional treatment facilities.
Details/Findings:	Officer Stewart observed no requirements that the permittee provide additional treatment facilities, therefore compliance with this requirement is currently not applicable.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS, 3.1 Flow Measurement 3.1: Periodic measurements of the effluent volume discharged over specified 24- hour periods, and the effluent quality, may be required by the Regional Waste Manager. Suitable provisions should therefore be incorporated into the works to accommodate this requirement.
Details/Findings:	Englewood Marine does not currently measure the effluent volume discharged over a 24-hour period. However, the Regional Waste Manager has not required the Permittee to measure the effluent volume discharged therefore compliance with this requirement is currently not applicable.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Sampling and Analysis 3.2: The permittee shall install a suitable sampling facility and obtain a grab sample of the effluent from the secondary sewage treatment plant once every three months. Obtain analyses of the sample for the following: 5-Day Biochemical Oxygen Demand Total Suspended Solids

Details/Findings:	<p>Mr. Sandberg informed Officer Stewart that grab samples of the effluent from the secondary sewage treatment plant are not obtained every three months as required and some quarters were missed during the inspection period.</p> <p>Officer Stewart requested all analyses of samples obtained in the last three years and was provided sample results from the following four sample dates: November 11, 2015, June 05, 2016, September 20, 2016 and October 09, 2017.</p> <p>This section of the permit requires sampling of the effluent every three months (quarterly).</p> <p>Englewood Marine was non-compliant with this requirement (based on submitted sample results) for missing eight of the 12 required quarterly sample events occurring between 2015-2017.</p>
Compliance:	Out
Actions to be taken:	Establish consistency with sampling and obtain a grab sample of the effluent from the secondary sewage treatment plant once every three months as required by this section of the permit.
Requirement Description:	<p>3. MONITORING AND REPORTING REQUIREMENTS, 3.4 Reporting</p> <p>3.4: Maintain data of analyses and flow measurements for inspection and every three months submit the data, suitably tabulated, to the Regional Waste Manager for the previous quarter. The first report is to be submitted within three months of the commencement of discharge. All reports shall be submitted within 31 days of the end of the quarter. Based on the results of the monitoring program, the permittee monitoring requirements may be extended or altered by the Regional Waste Manager.</p>
Details/Findings:	Officer Stewart observed that no data from Englewood Marine nor Englewood Packing Company has been submitted to ENV during the inspection period.
Compliance:	Out
Actions to be taken:	Begin to submit suitably tabulated data as required every three months within 31 days of the end of the quarter as required.

This is the first electronic compliance record for this authorization, since January 1, 2012.

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 www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/routine-environmental-reporting-submission-mailbox.

Please refer to the following web address for guidance on changing/amending a waste discharge authorization:
www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/change-authorizations.

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

Below are attachments related to this inspection.

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

Yours truly,

Darren Stewart
Environmental Protection Officer

cc:

Attachments:

1) IR79200 Englewood Packing Photo Record PE-13221.pdf Photo Record

Deliver via:

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

**Ministry of Environment
and Climate Change
Strategy**

Compliance
Environmental
Protection Division

Mailing Address:
2080-A
Labieux Rd
Nanaimo BC V9E 6J9

Telephone: 250 751 3100
Facsimile: 250 751 3103
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.

Authorization: PE-13221	Client Name: Englewood Packing Company (Marine Harvest)
NRIS IR #: 79200	Site Inspection Date: February 20, 2018

Photo 1

Englewood Packing Company Ltd. now named Englewood Marine



Photo 2

Underground wastewater collections sump that pumps up to the above ground tank.



Authorization: PE-13221	Client Name: Englewood Packing Company (Marine Harvest)
NRIS IR #: 79200	Site Inspection Date: February 20, 2018

Photo 3

Above ground tank with an aerated inverted cone inside.

Solids are retained while the supernatant is discharged via marine outfall.



Photo 4.

Marine outfall exiting the foreshore and running parallel to the dock.

