



Report Date: March 27, 2018

File: 14661

Report Number: 079384

Ucluelet Harbour Seafoods  
1661 Cedar Road  
PO Box 1089  
Ucluelet BC V0R 3A0

Dear Ucluelet Harbour Seafoods:

**Re: Non-compliance Advisory Letter, Permit 14661, Ucluelet Harbour Seafoods - Ucluelet**

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On February 22, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an inspection of your facility, Ucluelet Harbour Seafoods (UHS) located at 1661 Cedar Road, Ucluelet Harbour Seafoods - Ucluelet - Fish Processing Plant with authorization number 14661 under the *Environmental Management Act*. Ministry staff were accompanied on site by Max Hepburn, Pacific Seafoods; Irena Larochelle, Pacific Seafoods; and Joe Sutherland, Pacific Seafoods.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of Ucluelet Harbour Seafoods, 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:**

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| Requirement Description: | <b>Environmental Management Act, Environmental Management Act</b><br>6 (4): (4) Subject to subsection (5), a person must not introduce waste into the environment in such a manner or quantity as to cause pollution. |
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| Details/Findings:        | <p>On February 22, 2018, Ministry of Environment and Climate Change Strategy (ENV) Environmental Protection Officer Travis Kurinka conducted an on-site inspection at Pacific Seafood's Ucluelet Harbour Seafoods (UHS) fish processing plant located in Ucluelet, British Columbia. UHS is authorized to discharge wastewater from their fish processing plant under Environmental Management Act (EMA) effluent permit PE-14661. Officer Kurinka was accompanied by Pacific Seafood staff Max Hepburn (Environmental Compliance and Conservation Manager), Irena Laroche (Quality Assurance/Safety Manager), and Joe Sutherland (Maintenance Supervisor) during the inspection.</p> <p>Samples of the processing effluent were taken by the Officer at the time of the inspection. The samples were collected after the effluent had passed through the authorized treatment works, prior to discharge through the outfall</p> <p>The analytical results of the effluent (Laboratory Certificate of Analysis attached) were:<br/>Parameter Result Units:</p> <p>pH 6.72<br/>Total Suspended Solids 639 mg/L<br/>Ammonia, Total (as N) 1.35 mg/L<br/>Total Kjeldahl Nitrogen 65.7 mg/L<br/>Total Nitrogen 65.7 mg/L<br/>Total Organic Nitrogen 64.4 mg/L<br/>Total Phosphorus (P) 12.0 mg/L<br/>E. coli 10 CFU/100mL<br/>Enterococcus &gt;6000 CFU/100mL<br/>Coliform Bacteria - Fecal 1300 MPN/100mL<br/>BOD 1920 mg/L<br/>COD 1870 mg/L<br/>Oil and Grease 296 mg/L<br/>Toxicity = 96 hr (Static) LC50 = 25.4% 95% confidence limits: 22.81 and 28.29.</p> <p>It should be noted that the recommended hold times were exceeded for the analyses for pH, E.coli and Enterococcus and that these results should not be considered to be reliable for assessing compliance with this section.</p> <p>A single sample of the processing effluent was collected; therefore, there are insufficient available data at this time to determine whether the effluent has substantially altered or impaired the usefulness of the environment.</p> |
| Compliance:              | Not Determined  |
| Actions to be taken:     |   |
| Requirement Description: | <p><b>1. AUTHORIZED DISCHARGES, 1.1</b></p> <p>1.1.1: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT. The rate and characteristics of the discharge apply to the last accessible point prior to the connection to the outfall. The site reference number for this discharge is E221695. 1.1.1 The maximum authorised rate of discharge is 2560 m3/d.</p>   |

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| Details/Findings:        | <p>Officer Kurinka reviewed the daily submitted discharge rates submitted in the UHS 2016 and 2017 annual reports. Based on the review, UHS was found to be in compliance with their discharge limit during the following months:</p> <p>January 2016<br/> February 2016<br/> March 2016<br/> April 2016<br/> May 2016<br/> June 2016<br/> October 2016<br/> November 2016<br/> December 2016<br/> January 2017<br/> February 2017<br/> March 2017<br/> April 2017<br/> May 2017<br/> June 2017<br/> September 2017<br/> October 2017<br/> November 2017<br/> December 2017</p> |
| Compliance:              | In  |
| Actions to be taken:     |   |
| Requirement Description: | <p><b>1. AUTHORIZED DISCHARGES, 1.1</b></p> <p>1.1.1: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT. The rate and characteristics of the discharge apply to the last accessible point prior to the connection to the outfall. The site reference number for this discharge is E221695. 1.1.1 The maximum authorised rate of discharge is 2560 m3/d.</p>   |

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| Details/Findings:        | <p>UHS during the following months reported the following discharge exceedances:</p> <p>May (3 day Period) 2016: 4,670 m3/d<br/> June (3 day Period) 2016: 4,670 m3/d<br/> July 13-18, 2017: 3,789 m3/d<br/> July 20-25, 2017: 3,761 m3/d<br/> August 10-13, 2017: 2,917 m3/d<br/> August 24-30, 2017: 3,685 m3/d</p> <p>However, in the 2016 and 2017 annual reports UHS reported that the discharge rate exceedance was due to flow measurements being taken once over multiple day periods. Therefore, since UHS did not record or report a daily rate of discharge compliance could not be determined for the above listed months during 2016 and 2017.</p> |
| Compliance:              | Not Determined  |
| Actions to be taken:     |   |
| Requirement Description: | <p><b>1. AUTHORIZED DISCHARGES, 1.1</b></p> <p>1.1.2: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT. The rate and characteristics of the discharge apply to the last accessible point prior to the connection to the outfall. The site reference number for this discharge is E221695. 1.1.2 The characteristics of the discharge shall be equivalent to or better than fine screened Surimi production and shrimp processing effluent.</p>   |
| Details/Findings:        | Mr. Hepburn informed Officer Kurinka that UHS has not processed Surimi for several years and that the plant mainly processes hake. Therefore, compliance could not be determined for this section of the permit at the time of the inspection.  |
| Compliance:              | Not Determined  |
| Actions to be taken:     | <p>Please submit a request for a permit amendment to update this section of the permit to reflect current operating conditions at the plant. To begin the permit amendment please submit the attached form and fee to PermitAdministration.VictoriaEPD@gov.bc.ca. For more information on the permit amendment process please visit the following website:</p> <p><a href="https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/routine-application-process">https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/routine-application-process</a></p>                         |

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| Requirement Description: | <p><b>1. AUTHORIZED DISCHARGES, 1.1</b></p> <p>1.1.3: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT. The rate and characteristics of the discharge apply to the last accessible point prior to the connection to the outfall. The site reference number for this discharge is E221695. 1.1.3 The authorised works are an internal feed rotary drum screen (0.015 inch mesh) for the Surimi and filleting wastewater, decanting centrifuge for Surimi wash water, a primary shaker screen and a sidehill fine screen (45 mesh) for the shrimp processing wastewater, solids collection facilities, a connection line to the outfall, an outfall with diffuser extending a minimum of 200 m beyond the Ucluelet Harbour Limit to a minimum depth of 23 m below mean low water, and related appurtenances approximately located as shown on attached Site Plan A.</p> |
| Details/Findings:        | <p>During the inspection, Officer Kurinka observed the rotary drum screen (Photo 1) (0.0138 inch mesh), solids collection facilities, a connection line to the outfall, an outfall with diffuser extending a minimum of 200 m beyond the Ucluelet Harbour Limit to a minimum depth of 23 m below mean low water, and related appurtenances approximately located as shown on attached Site Plan A. Mr. Sutherland informed Officer Kurinka that in 2004 the decanting centrifuge for Surimi wash water, a primary shaker screen and a sidehill fine screen (45 mesh) for the shrimp processing wastewater was removed as the plant no longer processed Surimi.</p>   |
| Compliance:              | In   |
| Actions to be taken:     | <p>Please submit a request for a permit amendment to update this section of the permit to reflect current operating conditions at the plant. To begin the permit amendment please submit the attached form and fee to PermitAdministration.VictoriaEPD@gov.bc.ca. For more information on the permit amendment process please visit the following website:</p> <p><a href="https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/routine-application-process">https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/routine-application-process</a></p>  |
| Requirement Description: | <p><b>1. AUTHORIZED DISCHARGES, 1.1</b></p> <p>1.1.4: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT. The rate and characteristics of the discharge apply to the last accessible point prior to the connection to the outfall. The site reference number for this discharge is E221695. 1.1.4 The authorised works must be complete and in operation by December 31, 1998.</p>  |
| Details/Findings:        | <p>Officer Kurinka observed the rotary drum screen (0.0138-inch mesh), solids collection facilities, a connection line to the outfall to be complete and operational during the February 22, 2018, on-site inspection.</p>   |

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| Compliance:              | In  |
| Actions to be taken:     |   |
| Requirement Description: | <p><b>1. AUTHORIZED DISCHARGES, 1.1</b></p> <p>1.1.5: 1.1 This subsection applies to the discharge of effluent from a FISH PROCESSING PLANT. The rate and characteristics of the discharge apply to the last accessible point prior to the connection to the outfall. The site reference number for this discharge is E221695. 1.1.5 The location of the facilities from which the discharge originates is Lot 1, District Lot 282, Plan 18383, except Plan RW 2126 and 44168, Clayoquot District.</p>  |
| Details/Findings:        | Officer Kurinka observed the location of the facilities from which the discharge originates to be Lot 1, District Lot 282, Plan 18383, except Plan RW 2126 and 44168, Clayoquot District.   |
| Compliance:              | In  |
| Actions to be taken:     |   |
| Requirement Description: | <p><b>2. GENERAL REQUIREMENTS, 2.1 Maintenance of Works and Emergency Procedures</b></p> <p>2.1: 2.1 The permittee shall inspect the authorised 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 effective operation of the approved method of pollution control, the permittee shall notify the Regional Waste Manager immediately and take appropriate remedial action. The Regional Waste Manager may reduce or suspend the operation of the permittee to protect the environment until the approved method of pollution control has been restored.</p> |
| Details/Findings:        | Mr. Sutherland informed Officer Kurinka that the authorized works are inspected on a regular basis. During the inspection, Officer Kurinka observed the authorized works functioning and in good working order.   |
| Compliance:              | In  |

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| Actions to be taken:     |  |
| Requirement Description: | <b>2. GENERAL REQUIREMENTS, 2.1 Maintenance of Works and Emergency Procedures</b><br>2.1: 2.1 The permittee shall inspect the authorised 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 effective operation of the approved method of pollution control, the permittee shall notify the Regional Waste Manager immediately and take appropriate remedial action. The Regional Waste Manager may reduce or suspend the operation of the permittee to protect the environment until the approved method of pollution control has been restored. |
| Details/Findings:        | Mr. Hepburn informed Officer Kurinka that there were no emergency events in 2016 or 2017 which prevented UHS from effectively operating the approved method of pollution control. Therefore, this section of the permit is not applicable.   |
| Compliance:              | Not Applicable   |
| Actions to be taken:     | Please note that if an emergency event which prevents the effective operation of the approved method of pollution control should occur in the future, UHS must notify the Director immediately and take appropriate remedial action.   |
| Requirement Description: | <b>2. GENERAL REQUIREMENTS, 2.2 Bypasses</b><br>2.2: 2.2 The permittee shall ensure that no waste is discharged without being processed through the authorised works unless prior written approval is received from the Regional Waste Manager.  |
| Details/Findings:        | Mr. Hepburn informed Officer Kurinka that UHS did not bypass the authorized works during 2016 and 2017. Therefore, this section of the permit is not applicable.   |
| Compliance:              | Not Applicable   |
| Actions to be taken:     | Please note that if UHS is required to bypass the authorized works in the future, UHS must receive written approval from the Director prior to the bypass occurring.   |

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| Requirement Description: | <b>2. GENERAL REQUIREMENTS, 2.3 Process Modifications</b><br>2.3: 2.3 The permittee shall have prior written approval from the Regional Waste Manager, prior to implementing changes to the authorised works or to any process that may affect the quality and/or quantity of the discharge.  |
| Details/Findings:        | Mr. Hepburn informed Officer Kurinka that UHS did not make any changes to the authorized works or process modifications to their UHS operation during 2016 and 2017. Therefore this section of the permit is not applicable at this time.   |
| Compliance:              | Not Applicable  |
| Actions to be taken:     | Please note that if UHS in future decides to make changes to the authorized works and plant processes, UHS must notify and receive written approval from the Director prior to making those changes.  |
| Requirement Description: | <b>2. GENERAL REQUIREMENTS, 2.4 Solid Waste Disposal</b><br>2.4: 2.4 Solids from the fine screens and any other solid wastes from the operation are to be disposed of in a manner that is acceptable to the Regional Waste Manager.   |
| Details/Findings:        | Mr. Hepburn informed Officer Kurinka that all offal generated at UHS is taken by West Coast Reduction for proper disposal.  |
| Compliance:              | In  |
| Actions to be taken:     |   |
| Requirement Description: | <b>3. MONITORING AND REPORTING REQUIREMENTS 3.1 Discharge Monitoring, 3.1.1 Sampling and Analysis</b><br>3.1.1: 3.1.1 The permittee shall install a suitable sampling facility at the last accessible point prior to the outfall and obtain a flow proportional composite sample of the effluent, during Surimi production, for analysis as follows: a) Frequency: once every month<br>Parameters: 5-day Biochemical Oxygen Demand Total Suspended Solids Fecal Coliform Bacteria Ammonia Nitrogen (N) Total Residual Chlorine b) Frequency: May and October every year: Parameter: Toxicity - lethal concentration (LC <sub>50</sub> ) - 96 hour bioassay. The analyses for fecal coliform bacteria and total residual chlorine may be carried out on a grab sample of the effluent. |



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| Details/Findings:        | <p>Mr. Hepburn informed Officer Kurinka that UHS has not processed Surimi approximately since 2004 when the equipment to process Surimi was removed. Therefore, this section of the permit was not applicable at the time of the inspection. However, UHS voluntarily conducted effluent sampling (Photo 2) on the following dates in 2016 and 2017:</p> <p>February 22, 2016 - 111 mg/L BOD; 93 mg/L TSS, 0.64 mg/L Ammonia; 730 CFU/100 mL Fecal Coliform<br/> March 30, 2016 - 962 mg/L BOD; 680 mg/L TSS, 5.3 mg/L Ammonia; 340 CFU/100 mL Fecal Coliform<br/> May 24, 2016 - 1,880 mg/L BOD; 552 mg/L TSS, 9.4 mg/L Ammonia; 2,100 CFU/100 mL Fecal Coliform<br/> June 28, 2016 - 8 mg/L BOD; 6 mg/L TSS, 0.26 mg/L Ammonia; 63 CFU/100 mL Fecal Coliform<br/> September 1, 2016 - 4,690 mg/L BOD; 3,680 mg/L TSS, 29 mg/L Ammonia; 80,000 CFU/100 mL Fecal Coliform<br/> March 23, 2017 - 355 mg/L BOD; 160 mg/L TSS, 3 mg/L Ammonia; 90 CFU/100 mL Fecal Coliform<br/> April 27, 2017 - 2660 mg/L BOD; 710 mg/L TSS, 40 mg/L Ammonia; 15,000 CFU/100 mL Fecal Coliform<br/> May 31, 2017 - 838 mg/L BOD; 596 mg/L TSS, 1.7 mg/L Ammonia; 4,800 CFU/100 mL Fecal Coliform<br/> June 27, 2017 - 342 mg/L BOD; 260 mg/L TSS, 2.1 mg/L Ammonia; 8,800 CFU/100 mL Fecal Coliform<br/> July 26, 2017 - 1,070 mg/L BOD; 688 mg/L TSS, 2.7 mg/L Ammonia; 24,000 CFU/100 mL Fecal Coliform<br/> August 29, 2017 - 1,070 mg/L BOD; 688 mg/L TSS, 2.7 mg/L Ammonia; 24,000 CFU/100 mL Fecal Coliform<br/> October 26, 2017 - 1250 mg/L TSS, 11 mg/L Ammonia<br/> February 22, 2018 - 1920 mg/L BOD; 639 mg/L TSS; 1.35 Ammonia; 1300 MPN/100mL Fecal Coliform Bacteria; 96 hr (Static) LC50 = 25.4% 95% confidence limits: 22.81 and 28.29</p> |
| Compliance:              | Not Applicable   |
| Actions to be taken:     |  |
| Requirement Description: | <p><b>3. MONITORING AND REPORTING REQUIREMENTS, 3.1 Discharge Monitoring, 3.1.2 Flow Measurement and Fish Processing Plant Production</b></p> <p>3.1.2: 3.1.2 Provide and maintain a suitable flow measuring device and record once per day the effluent volume discharged into the outfall over a 24-hour period. Fish processing plant production records shall be maintained, and the quantity and duration of fish processing production shall be recorded each day.</p>   |

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| Details/Findings:        | <p>During the inspection, Mr. Sutherland informed Officer Kurinka that the current flow measuring device (Photo 3) only allows staff to calculate flow by recording the total flow for any given day and subtract flow reading from the previous day to get daily flow.</p> <p>In the UHS 2016 and 2017 annual reports, UHS reported that during the following months that flows were not recorded over a 24 hour period.</p> <p>June (3 day Period) 2016<br/> July (3 day Period) 2016<br/> August (3 day Period) 2016<br/> September (3 day Period) 2016<br/> July 13-18, 2017<br/> July 20-25, 2017<br/> August 10-13, 2017<br/> August 24-30, 2017</p>  |
| Compliance:              | Out   |
| Actions to be taken:     | Please ensure that effluent volume discharged is recorded daily over a 24-hour period. If this is not possible as UHS expressed concerns with staffing during the inspection, UHS should install and maintain a suitable flow measuring device which can record daily effluent volumes discharged into the outfall over a 24-hour period for a period of several days when staff are unavailable to take measurements.  |
| Requirement Description: | <p><b>3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring, 3.2.2 Water Column Profiles</b></p> <p>3.2.2: 3.2 The responsibility for carrying out the receiving environment monitoring program required below is shared jointly by the District of Ucluelet, Ucluelet Seafood Processors Ltd. and Pacific Coast Processors Ltd. The responsibility for cost of the program has been determined under the terms of a cost sharing agreement between the three parties. 3.2.2 Nine monitoring stations shall be established in a grid around the point of discharge, approximately located as shown on the attached Site Plan B. The specific locations shall be established to the satisfaction of the Regional Waste Manager. Commencing in 1999, once every month from March to October inclusive, and coinciding with normal fish processing plant discharges, water column profiles shall be carried out at Station #1, Station #2, Station #3, Station #4, and Station #5. Measurements shall be obtained at 0, 2, 4, 6, 8, 10, 15, 20, 25, 30, and 40 metres depth at each station for a) Dissolved Oxygen (<math>\pm 0.3</math> mg/L) b) Temperature (<math>\pm 0.15</math> °C) c) Salinity (<math>\pm 0.2</math> ppt) Calibrate the dissolved oxygen sensor during each monitoring survey by obtaining water samples and analysing them with the Winkler Titration method. Samples should be collected at the control station (Station #5) from depths of 5 m, 20 m and 40 m. Additionally, once every March, May, July and September, water samples shall be collected at 3 depths (surface, mid depth and the bottom) at Station #6, Station #7, Station #8 and Station #9 identified on Site Plan B. The samples shall be analysed for: a) pH b) Ammonia Nitrogen (N)</p> |

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| Details/Findings:        | <p>Officer Kurinka reviewed the submitted water column survey data in the UHS 2016 and 2017 annual reports. Based on the submitted data, UHS measured for DO, Temperature and Salinity for Stations 1-5; and collected samples and analysis for pH, Ammonia, and Nitrogen for Stations 6-9 on the following dates:</p> <ul style="list-style-type: none"> <li>-April 6, 2016</li> <li>-April 28, 2016</li> <li>-May 27, 2016</li> <li>-June 27, 2016</li> <li>-July 26, 2016</li> <li>-Sept 6, 2016</li> <li>-Sept 21, 2016</li> <li>-October 26, 2016</li> <li>-March 28, 2017</li> <li>-April 20, 2017</li> <li>-May 31, 2017</li> <li>-June 27, 2017</li> <li>July 27, 2017</li> <li>-August 23, 2017</li> <li>-September 18, 2017</li> <li>-October 5, 2017</li> </ul> <p>UHS did not submit water column data at Stations 1-9 for the months of March and August in 2016. Therefore, UHS has been found to be out of compliance with this section of the permit.</p>  |
| Compliance:              | Out  |
| Actions to be taken:     |  |
| Requirement Description: | <p><b>3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring, 3.2.3 Benthic Monitoring</b></p> <p>3.2.3: 3.2 The responsibility for carrying out the receiving environment monitoring program required below is shared jointly by the District of Ucluelet, Ucluelet Seafood Processors Ltd. and Pacific Coast Processors Ltd. The responsibility for cost of the program has been determined under the terms of a cost sharing agreement between the three parties. 3.2.3 A maximum of eight monitoring stations shall be established around the point of discharge. The number and location of the stations shall be established to the satisfaction of the Regional Waste Manager, and shall be based on the results of the Outfall Performance Study required in Subsection 3.2.1 above. Commencing in 1999, once every September, bottom sediment samples shall be obtained at each station. The samples shall be analysed for: a) Redox Potential b) Particle Size c) Total Organic Carbon Observations of colour, odour and texture shall be recorded for each sample. Inspections shall be carried out of the seabed conditions in the vicinity of the outfall terminus. The inspections shall be carried out once before discharge commences, one year after discharge commences and every two years thereafter. The inspections shall include a photographic (and or video) record of bottom conditions, an assessment of sediment accumulation at the outfall terminus and an assessment of biological changes in the area.</p> |

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| Details/Findings:        | <p>On February 27, 2018, Peter Howland at GreatPacific Engineering and Environment phoned Officer Kurinka in response to questions submitted to GreatPacific Engineering and Environment on, via email on February 26, 2018. In the phone conversation, Mr. Howland informed Officer Kurinka that sediment sampling was discontinued in 2014. The reason for the discontinuation was due to the lack of sediment found near the outfall terminus and stations.</p> <p>Mr. Howland also informed Officer Kurinka at the time of the inspection no permit amendments have been submitted to the ENV to have the sediment monitoring removed. Therefore, UHS is still required to conduct sediment sampling and has been found to be out of compliance.</p>   |
| Compliance:              | Out  |
| Actions to be taken:     | <p>Please submit a request for a permit amendment to update this section of the permit to reflect current operating conditions at the plant. To begin the permit amendment please submit the attached form and fee to PermitAdministration.VictoriaEPD@gov.bc.ca. For more information on the permit amendment process please visit the following website:</p> <p><a href="https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/routine-application-process">https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/routine-application-process</a></p>  |
| Requirement Description: | <p><b>3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring, 3.2.3 Benthic Monitoring</b></p> <p>3.2.3: 3.2 The responsibility for carrying out the receiving environment monitoring program required below is shared jointly by the District of Ucluelet, Ucluelet Seafood Processors Ltd. and Pacific Coast Processors Ltd. The responsibility for cost of the program has been determined under the terms of a cost sharing agreement between the three parties. 3.2.3 A maximum of eight monitoring stations shall be established around the point of discharge. The number and location of the stations shall be established to the satisfaction of the Regional Waste Manager, and shall be based on the results of the Outfall Performance Study required in Subsection 3.2.1 above. Commencing in 1999, once every September, bottom sediment samples shall be obtained at each station. The samples shall be analysed for: a) Redox Potential b) Particle Size c) Total Organic Carbon Observations of colour, odour and texture shall be recorded for each sample. Inspections shall be carried out of the seabed conditions in the vicinity of the outfall terminus. The inspections shall be carried out once before discharge commences, one year after discharge commences and every two years thereafter. The inspections shall include a photographic (and or video) record of bottom conditions, an assessment of sediment accumulation at the outfall terminus and an assessment of biological changes in the area.</p> |
| Details/Findings:        | <p>UHS conducted an inspection of the seabed condition near of the outfall terminus. The inspection was included in the 2016 annual report and included photographs, an assessment of sediment accumulation at the outfall terminus, and an assessment of biological changes in the area.</p>  |

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| Compliance:              | In   |
| Actions to be taken:     |  |
| Requirement Description: | <p><b>3. MONITORING AND REPORTING REQUIREMENTS,, 3.2 Receiving Environment Monitoring, 3.2.4 Fecal Coliform Monitoring</b></p> <p>3.2.4: 3.2 The responsibility for carrying out the receiving environment monitoring program required below is shared jointly by the District of Ucluelet, Ucluelet Seafood Processors Ltd. and Pacific Coast Processors Ltd. The responsibility for cost of the program has been determined under the terms of a cost sharing agreement between the three parties. 3.2.4 Seven monitoring stations shall be established around the point of discharge, approximately located as shown on the attached Site Plan C. The specific locations shall be established to the satisfaction of the Regional Waste Manager. Commencing in 1999, once every March, May, July and September, surface water samples shall be obtained at each station. The samples shall be analysed for fecal coliform bacteria.</p> |
| Details/Findings:        | <p>UHS reported in their 2016 annual report that fecal coliform surveys were conducted in April, May, July, and September of 2016 at the seven monitoring stations approximately located as shown on the attached Site Plan C.</p> <p>UHS reported in their 2017 annual report that fecal coliform surveys were conducted in April, June, August, and October of 2017 at the seven monitoring stations approximately located as shown on the attached Site Plan C.</p>   |
| Compliance:              | Out  |
| Actions to be taken:     | Please ensure that surface water samples shall be obtained at each of the seven monitoring stations once every March, May, July and September.   |

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| Requirement Description: | <p><b>3. MONITORING AND REPORTING REQUIREMENTS, 3.4 Reporting</b></p> <p>3.4: 3.4 Maintain data of analyses, flow measurements and production records 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 three months after discharge commences. Monitoring data shall be archived in electronic (ASCII) format using software in common use. The Outfall Performance Study required in Subsection 3.2.1 shall be submitted within one year of commencing discharge through the outfall authorised in subsection 1.1.3. An annual report shall be submitted which includes a summary and interpretation by an independent qualified professional of the discharge and receiving environment monitoring results for the previous year. The report shall provide an assessment of the impact of this discharge on the receiving environment and recommended changes (if any) to the monitoring program. The first report shall be submitted by December 31, 1999. Based on the results of the monitoring program and/or the outfall performance study, the permittee monitoring requirements may be extended or altered by the Regional Waste Manager.</p> |
| Details/Findings:        | <p>Officer Kurinka reviewed the submitted quarterly data of analyses, flow measurements and production records. UHS submitted all quarterly reports required for 2016 and 2017.</p> <p>UHS submitted their 2016 annual report on March 6, 2017, and their 2017 annual report on February 20, 2018. Both reports were prepared by GreatPacific Engineering and Environment. The annual reports included a summary and interpretation by Jason Clarke (P.Eng) an independent qualified professional of the discharge and receiving environment monitoring results for the previous year.</p>   |
| Compliance:              | In   |
| Actions to be taken:     |  |

**Compliance History:**

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

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,

Travis Kurinka  
Environmental Protection Officer

cc:

**Attachments:**

- |  |        |
|--|--------|
| 1) 2018-02-23 Photo Record - UHS Plant_PE14661.pdf | Photo  |
| Record   |        |
| 2) epd-ema-07_amend_clause_amendment_form.pdf      | Permit |
| Amendment Form                                     |        |

**Deliver via:**

|   |  |                                       |
|---|--|---------------------------------------|
| <b>Email:</b> <input checked="" type="checkbox"/> | <b>Fax:</b> <input type="checkbox"/>           | <b>Mail:</b> <input type="checkbox"/> |
| <b>Registered Mail:</b> <input type="checkbox"/>  | <b>Hand Delivery:</b> <input type="checkbox"/> |                                       |

**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](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.



|                      |  |
|----------------------|--|
| Authorization: 14661 | Client Name: Ucluelet Harbour Seafood            |
| NRIS IR #: 79384     | (Date) Site Inspection Photos: February 23, 2018 |

Photo 1

Rotary drum with 0.0138 inch (0.351 mm) screen at Ucluelet Harbour Seafoods main plant in Ucluelet, British Columbia.



Photo 2

Location where Ucluelet Harbour Seafood collects with grab samples for the effluent water quality sampling.





|                      |  |
|----------------------|--|
| Authorization: 14661 | Client Name: Ucluelet Harbour Seafood            |
| NRIS IR #: 79384     | (Date) Site Inspection Photos: February 23, 2018 |

Photo 3

Flow meter at Ucluelet Harbour Seafood main plant in Ucluelet, British Columbia.







Clause Amendment Form
for authorization to discharge waste under the Environmental Management Act
AMENDMENT to Permit, Approval, or Operational Certificate

FORM REFERENCE CODE: EPD-EMA-07.1

INSTRUCTIONS:

The amendment application process is comprised of multiple steps that requires submission of a preliminary application and fee, followed by meetings with Ministry staff, and submission of a final application. This form may be used in conjunction with the submission of a Preliminary Application to amend a Permit, Approval or Operational Certificate.

Before completing this application form, please review the following:

- Waste Discharge Regulation under the Environmental Management Act at www.bclaws.ca; and,
Ministry information and guidance documents that will assist in understanding the registration process and any other documents that may be required at http://www2.gov.bc.ca/gov/content?id=0876E90DA4744A449423D35EB4E09785.

It is preferred that this form is completed using a computer or typewriter. If completing this form by hand, please PRINT clearly.

Mandatory fields are marked with an asterisk (\*). Please ensure all required fields are completed or the application form may not be accepted.

Once the final application has been submitted, the application will be proceed through the Screening Phase to verify administrative and technical completeness.

A Tracking Number will be assigned to your request. Both the Authorization Number and Tracking Number should be referenced on all further documents submitted to support the amendment application request.

Under Environmental Management Act, a person is prohibited from introducing waste into the environment without authorization. Submitting an application to discharge is NOT an authorization to discharge.

This application form can be submitted to the Ministry of Environment by email (preferred), mail or by courier.

Table with 2 columns: Mail or Email and Courier. Mail or Email includes Environmental Protection Division, Business Services Branch, PO Box 9377 Stn Prov Govt, Victoria, BC V8W 9M1, and Email: PermitAdministration.VictoriaEPD@gov.bc.ca. Courier includes Ministry of Environment, Environmental Protection Division, Business Services Branch, 3rd Floor, 2975 Jutland Road, Victoria, BC V8T 5J9.

## Section 1: Application Information

|                                       |  |   |
|---------------------------------------|--|---|
| *Authorization Number                 |  | 1 |
| *Tracking Number                      |  | 2 |
| *Applicant Name                       |  | 3 |
| *Facility Name                        |  | 4 |
| *Name of person completing this form  |  | 5 |
| *This person completing this form is: | <input type="checkbox"/> The Applicant, as named on the Preliminary Application for Amendment Form, Section 2<br><input type="checkbox"/> The Agent, as named on the Preliminary Application for Amendment Form, Section 4 | 6 |
| *Number of clause changes requested   |  | 7 |

**A copy of Section 2 must be completed for each clause amendment. I.e. If there are three clauses that changes are being requested to, there should be three versions of Section 2 completed and submitted.**

**Section 2: Clause change details**

|  |  |   |
|--|--|---|
| <b>*Clause number</b>  |  | 1 |
| <b>*Existing clause language</b>   |  | 2 |
| <b>*Proposed changes</b><br>Please highlight changes to the clause using bold and/or colour to ensure clarity. |  | 3 |
| <b>*Rationale</b>  |  | 4 |

