



Report Date: March 28, 2018

File: 16725

Report Number: 080494

West Coast Reduction Limited
900 Maughan Rd
Nanaimo, BC V9X 1H5

Dear West Coast Reduction Limited:

Re: Non-compliance Advisory Letter, Permit 16725, Nanaimo

On February 20, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an office review inspection of the West Coast Reductions Ltd. dba Island Processing Company facility located at 900 Maughan Road, Nanaimo, BC, fish byproduct recovery plant with authorization number 16725 under the *Environmental Management Act* (EMA).

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of West Coast Reduction Limited, 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: 1.1 This subsection applies to the discharge of effluent from a FISH BYPRODUCT REDUCTION PLANT. The site reference number for this discharge is E245442. 1.1.1 The maximum authorised rate of discharge is 8,500 m3/d.
Details/Findings:	On February 20, 2018, Ministry of Environment and Climate Change Strategy (ENV), Environmental Protection Division staff conducted an office review inspection of the West Coast Reductions Ltd. (WCR) dba Island Processing Company facility (Facility), located at 900 Maughan Road, Nanaimo, BC, with authorization 16725 under the <i>Environmental Management Act</i> (EMA). Ministry staff spoke to Mr. Paul Faber, WCR, over the phone to conduct this inspection. Reviewed for compliance were the 2017 Q2, Q3, Q4 quarterly reports, the 2017 Annual Report, and the associated data and correspondence. Mr. Faber informed Officer Fraleigh that WCR, ceased discharging effluent as described in this permit in 2011. Since the facility has not discharged any effluent during the inspection period, compliance with this requirement is not applicable.

Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.1</p> <p>1.1.2: 1.1 This subsection applies to the discharge of effluent from a FISH BYPRODUCT REDUCTION PLANT. The site reference number for this discharge is E245442. 1.1.2 The Characteristics of the discharge shall not exceed: 5-Day Biochemical Oxygen Demand, 45 mg/L; Total Suspended Solids, 30 mg/L; pH Range, 6 to 9; Temperature, 45 Degrees Celsius; Ammonia Nitrogen, 10 mg/L.</p>
Details/Findings:	Mr. Faber informed Officer Fraleigh that WCR, ceased discharging effluent as described in this permit in 2011. Since the facility has not discharged any effluent during the inspection period, compliance with this requirement is not applicable.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<p>3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring, 3.2.2 Water Column</p> <p>3.2.2: Four monitoring stations shall be established. One station shall be at the discharge point and two others shall be at the edge of the initial dilution zone in the dominant current direction. The final station shall be a control point in the dominant current direction and outside the zone of influence of the discharge. Measurements of the depth profile at each station shall be obtained quarterly for: a) Dissolved Oxygen, mg/L; b) Temperature, degrees Celsius; c) Salinity, g/kg or percent per thousand; d) pH, pH units.</p>
Details/Findings:	<p>Four monitoring stations were established in the "Duke Point Marine Outfall Water Column Characterisation (Pre-Discharge Assessment)", September 2002, by Komex International Ltd., shown as #1, #2, #3 and #4. These four monitoring stations were deemed acceptable in a letter dated August 31, 2005, from ENV to the permittee.</p> <p>All of the required monitoring was conducted quarterly at each of the four monitoring stations for: a) Dissolved Oxygen: mg/L b) Temperature: Degrees Celsius c) Salinity: g/kg or percent per thousand d) pH: pH units as shown in the submitted quarterly Duke Point Outfall Receiving Environment Monitoring Reports.</p>

Compliance:	In
Actions to be taken:	
Requirement Description:	<p>3. MONITORING AND REPORTING REQUIREMENTS, 3.4 Reporting</p> <p>3.4: 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. All reports shall be submitted within 31 days of the end of the quarter. 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 recommend changes (if any) to the monitoring program. The annual reports shall be submitted within 31 days of the end of the calendar year (December 31). 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:	<p>Mr. Faber indicated that WCR continues to conduct monitoring at each of the four monitoring stations. Data of analyses were submitted on a quarterly basis by WCR. The 2016 and 2017 annual reports included a summary and interpretation by an independent qualified professional (GreatPacific Engineering and Environment) of the discharge and receiving environment monitoring results for the previous year. The 2017 Q3, Q4 and 2017 Annual Report were all submitted within the required time frames.</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>3. MONITORING AND REPORTING REQUIREMENTS, 3.4 Reporting</p> <p>3.4: 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. All reports shall be submitted within 31 days of the end of the quarter. 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 recommend changes (if any) to the monitoring program. The annual reports shall be submitted within 31 days of the end of the calendar year (December 31).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:	The 2017 Q2 report was submitted to the ENV via email on October 11, 2017, and not within 31 days of the end of the quarter. In addition to this, flow measurements were not provided in the quarterly reports. Please be advised that if no fish processing effluent has been discharged throughout each quarter, then a statement indicating zero flow is required to be submitted in order to maintain compliance.
Compliance:	Out
Actions to be taken:	

Compliance History:
2017-04-03 - IR 051913 Advisory

The Permittee has been found to be out of compliance with the reporting requirements of the Permit. To maintain compliance, 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.

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

Yours truly,

Connor Fraleigh
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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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.