



Report Date: March 15, 2018

File: 1975

Report Number: 079681

Ocean Fisheries Limited
13140 Rice Mill Road
Richmond, BC V6W 1A1

Dear Ocean Fisheries Limited:

Re: Non-compliance Advisory Letter, Permit 1975, 13140 Rice Mill Road, Richmond

On March 1, 2018, Ministry of Environment and Climate Change Strategy (ENV), Environmental Protection Division staff conducted an office review inspection of your facility, Ocean Fisheries Limited (OFL) located at 13140 Rice Mill Road, Richmond, BC, with authorization number 1975 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 Ocean Fisheries 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:	Appendix 01 (b): The maximum rate at which effluent may be discharged is an annual average of 960 m ³ /d and a maximum of 7240 m ³ /d consisting of a maximum of 40 m ³ /d of domestic sewage and the remaining quantity of process effluent and cooling water.
Details/Findings:	<p>On March 1, 2018, Ministry of Environment and Climate Change Strategy (ENV), Environmental Protection Division staff conducted an office review inspection of Ocean Fisheries Ltd. (OFL) located at 13140 Rice Mill Road, Richmond, BC, with Permit 1975 (Permit) authorized under the Environmental Management Act (EMA). Officer Connor Fraleigh spoke with Mr. Steven Yip (OFL) over the phone to conduct this inspection.</p> <p>During the call, Mr. Yip indicated that during the last inspection conducted on April 3, 2017, he was instructed by Officer Taylor White (ENV) to install a suitable flow measuring device in accordance with the Permit. Mr. Yip has since installed a suitable flow measuring device to record flow measurements. However, the April 3, 2017, inspection conducted did not include the amended permit clauses which required daily flow measurements. This led Mr. Yip to believe that he was only required to sample flows twice per year as opposed to the required daily flow measurements. Since no daily flow measurements were taken by Mr. Yip, compliance with this requirement could not be determined.</p>

Compliance:	Not Determined
Actions to be taken:	N/A
Requirement Description:	Appendix 01 (c): The characteristics of the effluent shall be equivalent to or better than the following: (i) Process Effluent - typical process effluent from a fish processing plant after passing through a 25 mesh screen (a screen with 0.7 mm openings). (ii) Domestic Sewage - typical domestic sewage after treatment by a septic tank system with an average retention time of 48 hours. (iii) Combined Effluent - (at a sampling point at which all effluent has been combined): Temperature: 32 Degrees Celsius. Residual Chlorine: 0.5 mg/L.
Details/Findings:	Mr. Yip indicated that when in operation, the characteristics of the effluent for sections (i) Process Effluent is typical process effluent from a fish processing plant after passing through a 25 mesh screen and (ii) Domestic Sewage is typical domestic sewage after treatment by a septic tank. The characteristics of the effluent for section (iii) Combined Effluent were measured on April 17, 2017, and September 6, 2017. The results show that the characteristics for the combined effluent were within the permitted limits during each sampling event.
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	Appendix 01 (d): The works authorized are: (i) For Process Effluent - 25 mesh screen and screen with 1.0 mm openings. (ii) For Domestic Sewage - septic tank system. (iii) - For Combined Effluent - submerged outfall, related appurtenances approximately located as shown on the attached Appendix A-1.
Details/Findings:	Mr. Yip indicated during our phone conversation that the authorized works for (i) Process Effluent, (ii) Domestic Sewage and (iii) Combined Effluent are a 25 mesh screen and screen with 1.0 mm openings, a septic tank system, a submerged outfall and related appurtenances.

Compliance:	In
Actions to be taken:	N/A
Requirement Description:	Appendix 02 (b.): The maximum rate at which effluent may be discharged is 7.5 m3/d.
Details/Findings:	Estimates for the volume of effluent discharged from a septic tank system which services the warehouse were not provided to the ENV for 2017, therefore, compliance with this requirement is not able to be determined.
Compliance:	Not Determined
Actions to be taken:	N/A
Requirement Description:	Appendix 02 (c.): The characteristics of the effluent shall be typical domestic sewage after treatment by a septic tank system with an average retention time of 48 hours.
Details/Findings:	Mr. Yip indicated that the characteristics of the effluent are typical domestic sewage after treatment by a septic tank system.
Compliance:	In
Actions to be taken:	N/A

Requirement Description:	Appendix 02 (d.): The works authorized are a septic tank system, submerged outfall and related appurtenances approximately located as shown on the attached Appendix A-1.
Details/Findings:	Mr. Yip indicated during our phone conversation that the authorized works for a septic tank system which services the warehouse include a septic tank system, a submerged outfall and related appurtenances.
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	Appendix 03 b): The maximum rate at which effluent may be discharged is 1.5 m3/d.
Details/Findings:	Estimates for the volume of effluent discharged from a septic tank system which services the office were not provided to the ENV for 2017, therefore, compliance with this requirement is not able to be determined.
Compliance:	Not Determined
Actions to be taken:	N/A
Requirement Description:	Appendix 03 c): The characteristics of the effluent shall be typical domestic sewage after treatment by a septic tank system with an average retention time of 48 hours.
Details/Findings:	Mr. Yip indicated that the characteristics of the effluent are typical domestic sewage after treatment by a septic tank system.

Compliance:	In
Actions to be taken:	N/A
Requirement Description:	Appendix 03 d): The works authorized are a septic tank system, submerged outfall and related appurtenances approximately located as shown on the attached Appendix A-1.
Details/Findings:	Mr. Yip indicated during our phone conversation that the authorized works for a septic tank system which services the office include a septic tank system, a submerged outfall and related appurtenances.
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	Appendix B-1 D. SOLIDS REMOVAL: Sludge and screened solids removed from the waste treatment works shall be disposed of to a site and in a manner approved by the Regional Waste Manager.
Details/Findings:	Mr. Yip indicated that all solids removed from the waste treatment works are picked up on a regular basis by West Coast Reductions Ltd. where they are taken for reduction and/or rendering.
Compliance:	In
Actions to be taken:	N/A

Requirement Description:	Appendix B-1 E. MAINTENANCE OF WORKS: 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. Yip indicated that all of the pollution control works are inspected regularly and are maintained in good working order.
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	Appendix B-2 G. BYPASSES: The discharge of effluent which has bypassed the designated treatment works is prohibited unless the approval of the Director or the Regional Waste Manager is obtained and confirmed in writing.
Details/Findings:	No bypasses occurred during 2016 and 2017.
Compliance:	Not Applicable
Actions to be taken:	N/A
Requirement Description:	Appendix B-2 H. PROCESS MODIFICATIONS: The Permittee shall notify the Regional Waste Manager prior to implementing changes to any process that may affect the quality and/or quantity of the discharge.
Details/Findings:	No process modifications were made during 2016 and 2017.

Compliance:	Not Applicable
Actions to be taken:	N/A
Requirement Description:	Appendix B-2 I. SEWER CONNECTION: The discharge of domestic sewage authorized by Appendices 01, 02, and 03 of this Permit is subject to connection to a municipal sewerage system which such facilities become available.
Details/Findings:	Connection to a municipal sewerage system was not available at the time of this inspection.
Compliance:	Not Applicable
Actions to be taken:	N/A
Requirement Description:	Appendix C-1 1. MONITORING (1) Grab Sampling: On and from June 30, 1988, when the fish processing plant is in operation, the following monitoring program shall be undertaken by the Permittee. The Regional Waste Manager may modify the monitoring program based on results submitted as well as any other data obtained by Waste Management: (1) The Permittee shall install a suitable sampling facility and obtain a grab sample of the combined effluent specified in Appendix 01 twice per year. Proper care should be taken in sampling, storing and transporting the samples to adequately control temperature and avoid contamination, breakage, etc.
Details/Findings:	Grab sampling was conducted twice per year on April 17, 2017 and September 6, 2017, as required by Appendix C-1, 1. (1) of the Permit.
Compliance:	In

Actions to be taken:	N/A
Requirement Description:	<p>Appendix C-1</p> <p>1. MONITORING (2) Analyses: On and from June 30, 1988, when the fish processing plant is in operation, the following monitoring program shall be undertaken by the Permittee. The Regional Waste Manager may modify the monitoring program based on results submitted as well as any other data obtained by Waste Management: (2) Obtain analyses of the sample for the following: (1) Temperature: Degrees Celsius (2) Residual Chlorine: mg/L. Analyses are to be carried out in accordance with procedures described in the second edition (February, 1976) of A Laboratory Manual for the Chemical Analysis of Waters, Wastewaters, Sediments, and Biological Materials, or by suitable alternative procedures as approved by the Regional Waste Manager. Copies of the above mentioned manual are available from the Environmental Laboratory, 3650 Wesbrook Crescent, Vancouver, British Columbia, V6S 2L2, at a cost of \$25.00 and are also available for inspection at all Waste Management Offices.</p>
Details/Findings:	<p>Grab samples were analyzed for Temperature: Degrees Celsius and Residual Chlorine: mg/L as required by Appendix C-1, 1. (2) of the Permit.</p> <p>Residual chlorine is measured on-site using a Hanna HI 93734 meter which uses the approved DPD Colorimetric method as per the BC Laboratory Manual (2015).</p>
Compliance:	In
Actions to be taken:	N/A
Requirement Description:	<p>Appendix C-2</p> <p>1. MONITORING (3) Flow Measurement: On and from June 30, 1988, when the fish processing plant is in operation, the following monitoring program shall be undertaken by the Permittee. The Regional Waste Manager may modify the monitoring program based on results submitted as well as any other data obtained by Waste Management: (3) (a) Provide and maintain a suitable flow measuring device and record once per day, when processing plant is in operation, the volume of combined effluent discharged over a 24-hour period for the discharge specified in Appendix 01. (3) (b) Estimate and record twice per year the volumes of effluent specified in Appendices 02 and 03 discharged over a 24-hour period.</p>
Details/Findings:	Flow measurements were not recorded daily for the discharge specified in Appendix 01 as required by Appendix C-2, 1. (3) (a) of the Permit.

Compliance:	Out
Actions to be taken:	As discussed during our phone call on March 7, 2018, please ensure that daily flow measurements are recorded (for the volume of combined effluent discharged over a 24-hour period) for the discharge specified in Appendix 01 when the plant is in operation.
Requirement Description:	Appendix C-2 1. MONITORING (3) Flow Measurement: On and from June 30, 1988, when the fish processing plant is in operation, the following monitoring program shall be undertaken by the Permittee. The Regional Waste Manager may modify the monitoring program based on results submitted as well as any other data obtained by Waste Management: (3) (a) Provide and maintain a suitable flow measuring device and record once per day, when processing plant is in operation, the volume of combined effluent discharged over a 24-hour period for the discharge specified in Appendix 01. (3) (b) Estimate and record twice per year the volumes of effluent specified in Appendices 02 and 03 discharged over a 24-hour period.
Details/Findings:	Flow measurements were not estimated twice per year for the discharge specified in Appendices 02 and 03 as required by Appendix C-2, 1. (3) (b) of the Permit.
Compliance:	Out
Actions to be taken:	As discussed during our phone call on March 7, 2018, please ensure that flow estimates are recorded twice per year (for the volumes of effluent discharged over a 24-hour period) for the discharges specified in Appendices 02 and 03.
Requirement Description:	Appendix C-2 1. MONITORING (4) Reporting: On and from June 30, 1988, when the fish processing plant is in operation, the following monitoring program shall be undertaken by the Permittee. The Regional Waste Manager may modify the monitoring program based on results submitted as well as any other data obtained by Waste Management: (4) Maintain data of analyses and flow measurements for inspection. Annually submit the data of analysis, the annual daily average flow rate for the combined effluent discharge specified in Appendix 01 and the flow measurements for the effluent discharges specified in Appendices 02 and 03, suitably tabulated, to the Regional Waste Manager for the previous year. The first report is to be submitted by January 31, 1994. Subsequent reports shall be submitted by January 31st of every year thereafter.

Details/Findings:	Data of analyses, the annual daily average flow rate for the combined effluent discharge specified in Appendix 01 and the flow measurements for the effluent discharges specified in Appendices 02 and 03 were not submitted for 2017 by January 31, 2018.
Compliance:	Out
Actions to be taken:	As discussed during our phone call on March 7, 2018, please ensure to annually submit the data of analysis, the annual daily average flow rate for the combined effluent discharge specified in Appendix 01 and the flow measurements for the effluent discharges specified in Appendices 02 and 03, suitably tabulated, to the ENV for the previous year by January 31st of the following year.

Compliance History:
2017-04-03 - IR 051277 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: Steven Yip (OFL)

Attachments:

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

**Ministry of Environment
and Climate Change
Strategy**

Compliance
Environmental
Protection Division

Mailing Address:
2nd Fl
10470-152nd St
Surrey BC V3R 0Y3

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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.