



Report Date: April 03, 2018

File: 2498

Report Number: 081179

J. S. McMillan Fisheries Ltd.
12 Orwell Street
North Vancouver BC V7J 2G1

Dear J. S. McMillan Fisheries Ltd.:

Re: Non-compliance Advisory Letter, Permit 2498, Prince Rupert

On February 08, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an inspection of your facility, J. S. McMillan Fisheries Ltd. located at J.S. McMillan Fisheries Ltd. - Prince Rupert - Reduction Facility with authorization number 2498 under the *Environmental Management Act*.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of J. S. McMillan Fisheries 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 AUTHORIZED SOURCE 1.1.1: 1.1 This section applies to the discharge of effluent from the cooling, processing, and domestic effluent septic tank areas. The site reference number for this discharge is E103457. 1.1.1 The maximum authorized rate of discharge is 3,270 cubic metres per day.
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Details/Findings:	<p>On February 8, 2018 Ministry of Environment and Climate Change Strategy (ENV) Officers Chris Garda and Neil Bailey (Officers) conducted a planned on-site inspection of the J.S. McMillan Fisheries Limited (Permittee) fish processing reduction facility (Facility) located in Prince Rupert, BC. The purpose of the inspection was to verify compliance with permit PE-2498 (Permit) which authorizes the discharge of effluent to the marine environment from the Facility.</p> <p>The time period assessed within this inspection report is from May 25, 2017 to April 3, 2018, as compliance is being assessed using the most recent version of the Permit issued on May 25, 2017. The scope of the inspection was an on-site inspection and a review of data received by ENV.</p> <p>Records of the effluent discharge volume for 2017 was not available at the time of the inspection, therefore compliance with this Permit requirement could not be determined. A review of annual reports from 2015 and 2016 indicates that the maximum flow for this time period was 437 cubic metres per month in August of 2016; this volume calculates to an average rate of discharge of 14 cubic metres per day, which is below the maximum authorized rate of discharge.</p>
Compliance:	Not Determined
Actions to be taken:	Please provide records of the monthly rate of discharge volumes for the Facility for 2017. Rate of discharge should be submitted with the annual report as instructed in Permit Section - 3.1.
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.1 AUTHORIZED SOURCE</p> <p>1.1.3: 1.1 This section applies to the discharge of effluent from the cooling, processing, and domestic effluent septic tank areas. The site reference number for this discharge is E103457. 1.1.3 The discharge is authorized from Authorized Works, which are an effluent collection system, 25 mesh fine screening facilities, stickwater evaporation system, 3 septic tanks, a submerged outfall, and related appurtenances approximately located as shown on the Site Plan.</p>
Details/Findings:	<p>The Officers observed Authorized Works of an effluent collection system, 25 mesh fine screening facilities, a stickwater evaporation system, 3 septic tanks, and a submerged outfall located as shown on the Site Plan at the time of the inspection. The facility uses a rotary drum screen for screening of effluent prior to discharge (Photos 1).</p> <p>It is noted that the Site Plan does not show specific locations for the listed Authorized Works, and only shows the location of the Facility.</p>
Compliance:	In

Actions to be taken:	No action required.
Requirement Description:	2. OPERATIONAL REQUIREMENTS, 2.2 Bypasses 2.2: The Permittee must not allow any discharge authorized by this authorization to bypass the Authorized Works, except with the prior written approval of the Director.
Details/Findings:	The Officers were informed that no bypasses of the designated treatment works occurred within the time period of this inspection.
Compliance:	Not Applicable
Actions to be taken:	No action required.
Requirement Description:	2. OPERATIONAL REQUIREMENTS, 2.3 Septic Tank Sludge and Scum Removal 2.3: The Permittee must remove sludge and scum from the septic tank annually or at other frequencies specified by the Director. The Permittee must dispose of sludge at a site approved by the Director, or as authorized by regulation under the Environmental Management Act. The Permittee must retain records of quantities, disposal location and dates of sludge and scum and keep such records available at the facility for inspection
Details/Findings:	Records of sludge and scum removal for 2017 were not available at the time of the inspection. Records were requested by the Officer, but not provided as of March 3, 2018.
Compliance:	Out
Actions to be taken:	Please retain records of quantities, disposal location and dates of sludge and scum removal at the facility for inspection.

Requirement Description:	<p>3. REPORTING REQUIREMENTS, 3.1 Annual Report</p> <p>3.1: The Permittee must record the monthly saleable tonnage of all fish species processed, the monthly volume of effluent flow, as well as the average daily effluent discharge rate in cubic metres per day (Section 1.1.1 of the permit). These records are required under this authorization for inspection when requested by Ministry staff and submit the data for the previous at any time to the Director in the form of an annual report spreadsheet. The Permittee must make submissions in respect of each subsequent annually within 30 days of the end of the applicable January 31 of the following year. The Permittee must submit all data required to be submitted under this section by email to the Ministry's Routine Environmental Reporting Submission Mailbox (RERSM) at EnvAuthorizationsReporting@gov.bc.ca or as otherwise instructed by the Director. For guidelines on how to properly name the files and email subject lines or for more information visit the Ministry website: http://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/routine-environmental-reporting-submission-mailbox.</p>
Details/Findings:	<p>The annual report for 2017 was not available at the time of this inspection. The annual report was requested by the Officers, but has not been received as of April 3, 2018. This exceeds the time frame required for the report to be submitted.</p>
Compliance:	<p>Out</p>
Actions to be taken:	<p>Please ensure that annual reports are submitted within the time period stated in Permit Section 3.1.</p>

Compliance History:

2016-04-01 - Notice of compliance, office review inspection - IR26827

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-dischargeauthorization/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,

Chris Garda
Environmental Protection Officer

cc:

Attachments:

1) 2018-02-08 NRIS Photo Record.pdf Site Photo

Deliver via:

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

**Ministry of Environment
and Climate Change
Strategy**

Compliance
Environmental
Protection Division

Mailing Address:
Bag 5000
3726 Alfred St
Smithers BC V0J 2N0

Telephone: 250 847 7260
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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.

NRIS Photo Record

Authorization: 2498	Client Name: J.S. McMillan Fisheries Ltd.
NRIS IR#: 811179	Site Inspection Photos: February 8, 2018

Photo 1 – Rotary drum fine screening facility with No.25 mesh fine screen.



Document : 2018-02-08 NRIS Photo Record.pdf

Document comment: Site Photo