



Report Date: March 26, 2018

File: 6776

Report Number: 079434

Great Glacier Salmon Ltd.
201 Cow Bay Road
Prince Rupert BC V8J 1A2

Dear Great Glacier Salmon Ltd.:

Re: Non-compliance Advisory Letter, Permit 6776, Western bank of the Stikine River

On February 26, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an office review inspection of your facility, Great Glacier Salmon Ltd. located at Western bank of the Stikine River with authorization number 6776 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 Great Glacier Salmon 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 fish processing facility, kitchen, laundry and shower. The site reference number for this discharge is E208885. 1.1.1 The maximum authorized rate of discharge is 184 cubic metres per day.
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Details/Findings:	<p>The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018).</p> <p>The effluent from the fish processing facility, kitchen, laundry and shower was equal to approximately 75.6 cubic metres per day in 2017. Additional discharge of offal from the fish processing facility by month in 2017 was: June 5.29 m3/day July 6.76 m3/day August 2.92 m3/day September 4.54 m3/day</p> <p>The total discharge by month was: June 80.89 m3/day (June 24-30) July 82.36 m3/day August 78.52 m3/day September 80.14 m3/day (September 1-15)</p> <p>All results are less than the maximum authorized rate of discharge of 184 cubic metres per day.</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.1 Authorized Source</p> <p>1.1.2: 1.1 This section applies to the discharge of effluent from the fish processing facility, kitchen, laundry and shower. The site reference number for this discharge is E208885. 1.1.2 The discharge is authorized to occur 24 hours per day between May 1st and October 31st.</p>
Details/Findings:	<p>The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018).</p> <p>The facility operated from June 1 to September 16 in 2017.</p>
Compliance:	In
Actions to be taken:	

Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 Authorized Source 1.1.3: 1.1 This section applies to the discharge of effluent from the fish processing facility, kitchen, laundry and shower. The site reference number for this discharge is E208885. 1.1.3 The characteristics of the discharge must be equivalent to or better than typical effluent from a fish dressing and freezing operation including fish offal, wash water and cooling water combined with typical effluent from a laundry, a shower and a dishwasher. All floatable components of the fish waste must be slit to reduce buoyancy prior to discharge.
Details/Findings:	Jennifer Gould informed ENV in an email dated February 28, 2018, that the characteristics of the discharge are fish processing effluent, fish offal, wash water and cooling water combined with laundry, shower and dishwasher water.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.1 Authorized Source 1.1.4: 1.1 This section applies to the discharge of effluent from the fish processing facility, kitchen, laundry and shower. The site reference number for this discharge is E208885. 1.1.4 The discharge is authorized from Authorized Works, which are an extended outfall and related appurtenances approximately located as shown on Site Plan.
Details/Findings:	Jennifer Gould informed ENV in an email dated February 28, 2018, that the authorized works in place are an extended outfall.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.2 Authorized Source 1.2.1: 1.2 This section applies to the discharge of treated domestic sewage effluent from a septic tank serving the kitchen facility. The site reference number for this discharge is E221007. 1.2.1 The maximum authorized rate of discharge is 1.35 cubic metres per day.

Details/Findings:	<p>The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018).</p> <p>The discharge of sewage effluent from a septic tank serving the kitchen facility by month in 2017 was: June 0.56 m3/day July 0.72 m3/day August 0.60 m3/day September 0.28 m3/day (September 1-16)</p> <p>All results are less than the maximum authorized rate of discharge of 1.35 cubic metres per day.</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.2 Authorized Source</p> <p>1.2.2: 1.2 This section applies to the discharge of treated domestic sewage effluent from a septic tank serving the kitchen facility. The site reference number for this discharge is E221007. 1.2.2 The discharge is authorized to occur 24 hours per day between May 1st and October 31st.</p>
Details/Findings:	<p>The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018).</p> <p>The facility operated from June 1 to September 16 in 2017.</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.2 Authorized Source</p> <p>1.2.3: 1.2 This section applies to the discharge of treated domestic sewage effluent from a septic tank serving the kitchen facility. The site reference number for this discharge is E221007. 1.2.3 The characteristics of the discharge must be equivalent to that of typical septic tank effluent.</p>

Details/Findings:	Jennifer Gould informed ENV in an email dated February 28, 2018, that the discharge is septic tank effluent.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.2 Authorized Source 1.2.4: 1.2 This section applies to the discharge of treated domestic sewage effluent from a septic tank serving the kitchen facility. The site reference number for this discharge is E221007. 1.2.4 The discharge is authorized from Authorized Works, which are one 3.6 cubic metre (128 cubic feet) septic tank, a submerged outfall and related appurtenances approximately located as shown on Site Plan.
Details/Findings:	Jennifer Gould informed ENV in an email dated February 28, 2018, that the authorized works in use are a 3.6 cubic metre septic tank and a submerged outfall.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.3 Authorized Source 1.3.1: 1.3 This section applies to the discharge of treated domestic sewage effluent from a septic tank serving the housing facility. The site reference number for this discharge is E221008. 1.3.1 The maximum authorized rate of discharge is 2.7 cubic metres per day.

Details/Findings:	<p>The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018).</p> <p>The discharge of sewage effluent from a septic tank serving the housing facility by month in 2017 was: June 0.56 m3/day July 0.72 m3/day August 0.60 m3/day September 0.28 m3/day</p> <p>All results are less than the maximum authorized rate of discharge of 2.7 cubic metres per day.</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.3 Authorized Source</p> <p>1.3.2: 1.3 This section applies to the discharge of treated domestic sewage effluent from a septic tank serving the housing facility. The site reference number for this discharge is E221008. 1.3.2 The discharge is authorized to occur 24 hours per day between May 1st and October 31st.</p>
Details/Findings:	<p>The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018).</p> <p>The facility operated from June 1 to September 16 in 2017.</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.3 Authorized Source</p> <p>1.3.3: 1.3 This section applies to the discharge of treated domestic sewage effluent from a septic tank serving the housing facility. The site reference number for this discharge is E221008. 1.3.3 The characteristics of the discharge must be equivalent to that of typical septic tank effluent.</p>

Details/Findings:	Jennifer Gould informed ENV in an email dated February 28, 2018, that the discharge is septic tank effluent.
Compliance:	In
Actions to be taken:	
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.3 Authorized Source 1.3.4: 1.3 This section applies to the discharge of treated domestic sewage effluent from a septic tank serving the housing facility. The site reference number for this discharge is E221008. 1.3.4 The discharge is authorized from Authorized Works, which are 7.3 cubic metre (256 cubic feet) septic tank, a submerged outfall and related appurtenances approximately located as shown on Site Plan.
Details/Findings:	Jennifer Gould informed ENV in an email dated February 28, 2018, that the authorized works in use are a 7.3 cubic metre septic tank and a submerged outfall.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.1 Maintenance of Works and Emergency Procedures 2.1: 2.1 The Permittee must regularly inspect the Authorized Works 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 Authorized Works or leads to an unauthorized discharge, the Permittee must take remedial action to restore the effective operation of the Authorized Works and to prevent any unauthorized discharges. The Permittee must immediately report the emergency or condition and the remedial action that has and will be taken to the RAPP line (1-877-952-7277, #7272 from mobile phone) or electronically at this link: http://www.env.gov.bc.ca/cos/rapp/form.htm . The Director may require the Permittee to reduce or suspend operations until the Authorized Works have been restored, and/or corrective steps have been taken to prevent unauthorized discharges.

Details/Findings:	Jennifer Gould informed ENV in an email dated February 28, 2018, that daily inspections of the authorized works are conducted.
Compliance:	In
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.2 Bypasses 2.2: 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:	There were no bypasses of the authorized works in 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.3 Posting of Outfall 2.3: 2.3 The Permittee must erect and maintain a sign along the alignment of the outfall above the high water mark. The sign must identify the nature of the works. The Permittee must confirm whether the wording and size of the sign is acceptable to the Director prior to installing the sign.
Details/Findings:	Jennifer Gould informed ENV in an email dated February 28, 2018, that a sign identifying the outfall is erected at the beginning of each season and removed at the end of the season because of the snow load.
Compliance:	In

Actions to be taken:	
Requirement Description:	2. GENERAL REQUIREMENTS, 2.4 Septic Tank Sludge and Scum Removal 2.4: 2.4 The Permittee must remove sludge and scum from the septic tank every three years or at 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:	Jennifer Gould informed ENV in an email dated February 28, 2018, that the sludge and scum from the septic tank were removed three years ago. No request for records was made at the time of the inspection.
Compliance:	In
Actions to be taken:	Ensure that records are retained of the quantities, disposal location and dates of sludge and scum.
Requirement Description:	3. MONITORING REQUIREMENTS, 3.1 Receiving Environment Monitoring 3.1: The Permittee must complete visual inspections at monthly intervals to record the presence or absence of floatables attributable to Great Glacier Salmon's operation on the river. If fish offal is found to accumulate on the shores of the Stikine River, leachate is observed from the landfill site, or solids or floatables are observed from the septic tanks the Permittee must inform the Director in writing immediately. Based on reports that may results from these observations the Director may modify the program to increase or decrease the requirements as they consider appropriate.
Details/Findings:	The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018). The annual report did not contain a summary of monthly inspections. Jennifer Gould informed ENV in an email dated February 28, 2018, that daily sanitation checks are conducted; however, an example check list does not specifically mention visual inspections for the presence or absence of floatables attributable to Great Glacier Salmon's operation on the river.
Compliance:	Out

Actions to be taken:	Ensure that visual inspections are conducted at monthly intervals to record the presence or absence of floatables attributable to Great Glacier Salmon's operation on the river.
Requirement Description:	<p>4. REPORTING REQUIREMENTS, 4.1 Reporting</p> <p>4.1: 4.1 The Permittee must submit an annual report which includes a summary of monthly inspections, a monthly summary of fish offal discharged and a monthly summary of camp occupancy. This report is to be in a format which is suitable for review by the public or other government agencies. The report is to be submitted annually by March 31st for the previous 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-</p>
Details/Findings:	<p>The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018).</p> <p>The annual report contained a monthly summary of fish offal discharged and a monthly summary of camp occupancy. The 2017 annual report was submitted before March 31, 2018.</p>
Compliance:	In
Actions to be taken:	
Requirement Description:	<p>4. REPORTING REQUIREMENTS, 4.1 Reporting</p> <p>4.1: 4.1 The Permittee must submit an annual report which includes a summary of monthly inspections, a monthly summary of fish offal discharged and a monthly summary of camp occupancy. This report is to be in a format which is suitable for review by the public or other government agencies. The report is to be submitted annually by March 31st for the previous 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-</p>

Details/Findings:	The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018). The annual report did not contain a summary of monthly inspections.
Compliance:	Out
Actions to be taken:	Ensure that a summary of monthly inspections as required in Section 3.1 are included in the annual report.
Requirement Description:	4. REPORTING REQUIREMENTS, 4.2 Non-compliance Notification 4.2: 4.2 The Permittee must immediately notify the Director or designate by email EnvironmentalCompliance@gov.bc.ca, or as otherwise instructed by the Director, of any non-compliance with the requirements of this authorization by the Permittee and take remedial action to remedy any effects of such non-compliance. The Permittee must provide the Director with written confirmation of all such non-compliance events, including available test results within 24 hours of the original notification, unless otherwise directed by the Director.
Details/Findings:	The Permittee did not have any non-compliances in 2017.
Compliance:	Not Applicable
Actions to be taken:	

Requirement Description:	<p>4. REPORTING REQUIREMENTS, 4.3 Non-compliance Reporting</p> <p>4.3: 4.3 If the Permittee fails to fully comply with the requirements of this authorization, the Permittee must, within 30 days of such non-compliance, submit to the Director a written report that is satisfactory to the Director and includes, but is not necessarily be limited to, the following: a. all relevant test results obtained by the Permittee related to the noncompliance. b. an explanation of the most probable cause(s) of the noncompliance, and c. a description of remedial action planned and/or taken by the Permittee to prevent similar noncompliance(s) in the future. The Permittee must submit all non-compliance reporting required to be submitted under this section by email to the Ministry's Compliance Reporting Submission Mailbox (CRSM) at EnvironmentalCompliance@gov.bc.ca, or as otherwise instructed by the Director. For guidelines on how to report a non-compliance 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/non-compliance-reporting-mailbox</p>
Details/Findings:	The Permittee did not have any non-compliances in 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<p>4. REPORTING REQUIREMENTS, 4.4 Non-compliance Reporting and Exceedances</p> <p>4.4: 4.4 The Permittee must cause each data submission required by this authorization to include a statement outlining the number of exceedances of Permitted discharges that occurred during the reporting period, the dates of each such exceedance, an explanation as to the cause of the exceedances, and a description of the measures taken by the Permittee to rectify the cause of each such exceedance. If no exceedances occurred over the reporting period, the required statement may instead indicate that no exceedance of Permitted discharges occurred during the reporting period.</p>
Details/Findings:	<p>The 2017 Annual Report was reviewed to assess compliance with this requirement (Waste Report 2017 and Survey Questions, submitted on February 28, 2018).</p> <p>No exceedances of the permitted discharges occurred in 2017 and a statement indicating this was included in the annual report.</p>
Compliance:	In

Actions to be taken:	
Requirement Description:	4. REPORTING REQUIREMENTS, 4.5 Spill Reporting 4.5: 4.5 The Permittee must immediately report all spills to the environment (as defined in the Spill Reporting Regulation) in accordance with the Spill Reporting Regulation, which among other things, requires notification to Emergency Management BC at 1-800-663-3456.
Details/Findings:	The Permittee did not report any spills in 2017.
Compliance:	Not Applicable
Actions to be taken:	

The permit for this authorization was amended on June 20, 2017, therefore, compliance was only assessed with the requirements of the amended permit and for compliance since the date of the amendment.

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.

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

Yours truly,

Colin Meldrum
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

Mailing Address:
1259 Dalhousie Dr
Kamloops BC V2C 5Z5

Telephone: 250 371 6200
Facsimile: 250 371 6234
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.