



Report Date: March 19, 2018

File: 7866

Report Number: 079739

Aero Trading Company Ltd.
1080 Skeena Drive
Port Edward BC V0V 1G0

Dear Aero Trading Company Ltd.:

Re: Non-compliance Advisory Letter, Permit 7866, Port Edward

On February 07, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an inspection of your facility, Aero Trading Company Ltd. located at Port Edward - Fish Processing Facility with authorization number 7866 under the *Environmental Management Act*. Ministry staff were accompanied on site by William Postulo, Aero Trading Company Ltd.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of Aero Trading Company 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 a PROCESS OUTFALL - AERO TRADING. The site reference number for this discharge is E209269. 1.1.1 The maximum rate of discharge is 110 cubic metres per day, from March through to September annually.
--------------------------	---

Details/Findings:	<p>On February 7, 2018, Ministry of Environment and Climate Change Strategy (ENV) Officers Chris Garda and Neil Bailey (Officers) conducted a planned on-site inspection of the Aero Trading Company Ltd. fish processing facility (Facility) located in Port Edward, BC. The Facility is authorized to discharge effluent to the marine environment under permit PE-7866 (Permit).</p> <p>The time period assessed during this inspection report is from January 1, 2016 to February 7, 2018. The scope of this inspection was the review of the 2016 and 2017 annual reports, and an on-site inspection to verify compliance with the Permit.</p> <p>The Permittee reported effluent discharge volumes that exceed the maximum rate of discharge for July and August of 2016 as follows:</p> <p>July 2016 - A total monthly effluent discharge of 9385 cubic metres equaling an approximate average daily discharge of 302 cubic metres per day, exceeding the maximum daily discharge limit of 110 cubic metres per day on at least one day that month.</p> <p>August 2016 - A total monthly effluent discharge of 4660 cubic metres equaling an approximate average daily discharge of 150 cubic metres per day, exceeding the maximum daily discharge limit of 110 cubic metres per day on at least one day that month.</p>
Compliance:	Out
Actions to be taken:	Ensure that the effluent rate of discharge does not exceed the maximum rate of discharge of 110 cubic metres per day, as stated in the Permit.
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.1 Authorized Source</p> <p>1.1.1: 1.1 This section applies to the discharge of effluent from a PROCESS OUTFALL - AERO TRADING. The site reference number for this discharge is E209269. 1.1.1 The maximum rate of discharge is 110 cubic metres per day, from March through to September annually.</p>

Details/Findings:	<p>The Permittee reported effluent discharge for January, February, and October through December of 2016 and 2017. As the Permit does not authorize effluent discharge for these months, effluent discharge is prohibited during this time period.</p> <p>Total monthly effluent discharge in cubic metres reported for January, February, and October through December.</p> <p>2016 January - 804 February - 1923 October - 962 November - 539 December - 40</p> <p>2017 January - 35 February - 70 October - 304 November - 124 December - 4</p> <p>It is noted that the Permittee uses water use as a surrogate for effluent flow metering, and water is also used for ice production.</p>
Compliance:	Out
Actions to be taken:	<p>Effluent discharge is only authorized from March through to September annually under the Permit. Any effluent discharge from the facility outside of this time period is an unauthorized discharge to the environment.</p> <p>In order to discharge effluent from the Facility outside of the time period authorized by the Permit, the Permittee must receive approval from ENV. It is recommended that the Permittee submit a permit amendment request to ENV Authorizations to request approval to discharge effluent from the Facility outside of the March through September time period. Additional information, guidance and forms can be found on the ENV website at: https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/change-authorizations.</p>
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 a PROCESS OUTFALL - AERO TRADING. The site reference number for this discharge is E209269. 1.1.3 The authorized works are floor drains, collection sump, coarse floor screens, No.25 mesh fine screening facilities, outfall and related appurtenances approximately located as shown on Site Plan A.</p>

Details/Findings:	The Officers observed authorized works including floor drains, a collection sump, coarse floor screens, a No.25 mesh fine screen facility, and an outfall located as shown on Site Plan A at the time of the inspection. The facility uses a rotary drum screen for screening of effluent prior to discharge (Photos 1 and 2).
Compliance:	In
Actions to be taken:	No action required.
Requirement Description:	2. GENERAL REQUIREMENTS, 2.1 Effluent Volume and Plant Production 2.1: The permittee shall record once per month on a day that is representative of the normal operation the volume of waste flow in m3/day and the tonnage (or kg) or each fish species processed per month.
Details/Findings:	The Permittee reported the total monthly volume of waste discharged per month and the tonnage of each fish species processed per month for 2016 and 2017. The Facility processes salmon, herring, halibut, black cod, and cod.
Compliance:	In
Actions to be taken:	No action required.
Requirement Description:	2. GENERAL REQUIREMENTS, 2.4 Bypasses 2.4: The discharge of effluent which has bypassed the designated treatment works is prohibited unless the consent of the Director is obtained and confirmed in writing.
Details/Findings:	The Permittee informed the Officers 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. GENERAL REQUIREMENTS, 2.5 Process Modifications 2.5: The permittee shall notify the Director prior to implementing changes to any process that may affect the quality and/or quantity of the discharge.
Details/Findings:	The Permittee informed the Officers that no process modifications have been implemented that may affect the quality and/or quantity of the discharge from the Facility. The Officers did not observe any process modification at the time of the inspection.
Compliance:	Not Applicable
Actions to be taken:	No action required.
Requirement Description:	3. REPORTING REQUIREMENTS, 3.1 Reporting 3.1: Maintain data of analyses and flow measurements for inspection and submit the data, suitably tabulated, to the Director, for the previous year. The first report is to be submitted by January 30, 2012. All reports must be submitted within 30 days of the end of the previous year.
Details/Findings:	Data of flow measurements and tonnage of each fish species processed per month was submitted within 30 days of the end of the previous year for 2016 and 2017. Monitoring is not required under the Permit unless required by the Director. As no monitoring was required by the Director from January 1, 2016 to December 31, 2017, the reporting of analyses is not applicable for the time period assessed during this inspection.
Compliance:	In
Actions to be taken:	No action required.

Compliance History:

February 4, 2014 - Notice of compliance, IR16289

June 25, 2013 - Notice of compliance, IR10362

April 10, 2013 - Notice of compliance, IR9306

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,

Chris Garda

Environmental Protection Officer

cc:

Attachments:
1) 2018-02-07 NRIS Photo Record.pdf Site Photos

Deliver via:			
Email:	<input checked="" type="checkbox"/>	Fax:	<input type="checkbox"/>
Registered Mail:	<input type="checkbox"/>	Mail:	<input checked="" type="checkbox"/>
		Hand Delivery:	<input type="checkbox"/>

**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
Facsimile: 250 847 7591
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: PE-7866	Client Name: Aero Trading Company Ltd.
NRIS IR#: 79739	Site Inspection Photos: February 7, 2018

Photo 1 – No.25 mesh fine screen facility, using a rotary drum screen.



Photo 2 – Effluent outfall pipe.

