



Report Date: April 03, 2018

File: 8085

Report Number: 079975

Bella Bella Fisheries Ltd.  
PO Box 197  
Bella Bella, BC V0T 1Z0

Dear Bella Bella Fisheries Ltd.:

**Re: Non-compliance Advisory Letter, Permit 8085, Lama Passage - McLaughlin Bay**

On March 05, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff, conducted an office review inspection of your facility, Bella Bella Fisheries Ltd. located at Lama Passage - McLaughlin Bay Fish Processing Plant with authorization number 8085 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 Bella Bella 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:	<b>1. AUTHORIZED DISCHARGES, 1.1</b>  1.1.1: The discharge of effluent to which this subsection is applicable is from a fish processing plant as shown on the attached Site Plan. The site reference number for this discharge is E210004. 1.1.1 The maximum rate at which effluent may be discharged is 130 m <sup>3</sup> /day. The solids contained in the effluent shall be no more than 5,000 Kg/day for no more than 90 days per year and no more than 5 Kg/day for the remainder of the year.
Details/Findings:	On March 5, 2018, Ministry of Environment and Climate Change Strategy (ENV), Environmental Protection Division staff, conducted an office review inspection of the Bella Bella Fisheries Ltd. facility with authorization 8085 under the Environmental Management Act (EMA). Ministry staff spoke to Mr. Mike Renwick, owner of Renwick and Associates, over the phone to conduct this inspection.  Mr. Renwick informed ENV that no measurements of the effluent discharge rates to capture both effluent and solids have been conducted; therefore, compliance with this requirement could not be determined.
Compliance:	Not Determined

Actions to be taken:	
Requirement Description:	<b>1. AUTHORIZED DISCHARGES, 1.1</b> 1.1.2: The discharge of effluent to which this subsection is applicable is from a fish processing plant as shown on the attached Site Plan. The site reference number for this discharge is E210004. 1.1.2 The characteristics of the discharge shall be typical of an effluent from a fish processing plant undertaking dressing only.
Details/Findings:	Mr. Renwick informed ENV that the effluent from the fish processing plant is from the processing of salmon and Herring roe.
Compliance:	In
Actions to be taken:	
Requirement Description:	<b>1. AUTHORIZED DISCHARGES, 1.1</b> 1.1.3: The discharge of effluent to which this subsection is applicable is from a fish processing plant as shown on the attached Site Plan. The site reference number for this discharge is E210004. 1.1.3 The works authorized are a comminutor, self cleaning coarse bar screen with a maximum of 2.5 cm spacing, submerged outfall and related appurtenances, approximately located as shown on the attached Site Plan.
Details/Findings:	No assessment was made of the authorized works.
Compliance:	Not Determined
Actions to be taken:	

Requirement Description:	<b>1. AUTHORIZED DISCHARGES, 1.2</b> 1.2.1: The discharge of effluent to which this subsection is applicable is from a fish processing plant, a ferry terminal and two houses as shown on the attached Site Plan. The site reference number for this discharge is E210004. 1.2.1 The maximum rate at which effluent may be discharged is 9 m <sup>3</sup> /day.
Details/Findings:	Mr. Renwick informed ENV that there is no longer any discharge of septic effluent because the facility has been connected to the municipal sewer system.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<b>1. AUTHORIZED DISCHARGES, 1.2</b> 1.2.2: The discharge of effluent to which this subsection is applicable is from a fish processing plant, a ferry terminal and two houses as shown on the attached Site Plan. The site reference number for this discharge is E210004. 1.2.2 The characteristics of the discharge shall be typical of septic tank effluent.
Details/Findings:	Mr. Renwick informed ENV that there is no longer any discharge of septic effluent because the facility has been connected to the municipal sewer system.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<b>1. AUTHORIZED DISCHARGES, 1.2</b> 1.2.3: The discharge of effluent to which this subsection is applicable is from a fish processing plant, a ferry terminal and two houses as shown on the attached Site Plan. The site reference number for this discharge is E210004. 1.2.3 The works authorized are 3 septic tanks, a submerged outfall, and related appurtenances, approximately located as shown on the attached Site Plan.

Details/Findings:	Mr. Renwick informed ENV that there is no longer any discharge of septic effluent because the facility has been connected to the municipal sewer system.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<b>2. GENERAL REQUIREMENTS, 2.1 Maintenance of Works and Emergency Procedures</b> 2.1: The Permittee shall inspect the pollution control works regularly and maintain them in good working order. In the event of an emergency or condition beyond the control of the Permittee which prevents continuing operation of the approved method of pollution control, the Permittee shall notify the Regional Waste Manager within 60 hours and take appropriate remedial action.
Details/Findings:	Mr. Renwick informed ENV that there is a full time staff member who is responsible for maintenance at the facility and maintains the pollution control works in good working order. No emergencies which prevented continued operation using the approved method of pollution control were reported.
Compliance:	In
Actions to be taken:	
Requirement Description:	<b>2. GENERAL REQUIREMENTS, 2.2 Bypasses</b> 2.2: The discharge of effluent which has bypassed the designated treatment works is prohibited unless the consent of the Regional Waste Manager is obtained and confirmed in writing.
Details/Findings:	Mr. Renwick informed ENV that effluent did not bypass the designated treatment works in 2016 or 2017.

Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<b>2. GENERAL REQUIREMENTS, 2.3 Process Modifications</b> 2.3: 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:	Mr. Renwick informed ENV that there have been no changes to any process in 2016 or 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	<b>2. GENERAL REQUIREMENTS, 2.4 Posting of Outfall</b> 2.4: The Permittee shall erect a sign along the alignment of the outfall above the high water mark. The sign shall identify the nature of the works. The wording and size of the sign requires the consent of the Regional Waste Manager.
Details/Findings:	Mr. Renwick informed ENV that there is a sign identifying the outfall and the nature of the works.
Compliance:	In
Actions to be taken:	

Requirement Description:	<b>3. MONITORING AND REPORTING REQUIREMENTS, 3.1 Flow Measurement</b> 3.1: Provide and maintain a suitable flow measuring device and record once per month the effluent volume discharged over a 24-hour period.
Details/Findings:	Mr. Renwick informed ENV that there is currently no flow measuring device being used at the facility. Bella Bella Fisheries Ltd. was unable to provide records of a once per month effluent volume discharged over a 24-hour period.
Compliance:	Out
Actions to be taken:	Provide and maintain a suitable flow measuring device and record once per month the effluent volume discharged over a 24-hour period.
Requirement Description:	<b>3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring, 3.2.1 Profile Monitoring</b> 3.2.1: The Permittee shall obtain field measurements twice per year. The two sampling periods shall be at least 30 days apart and shall be coordinated to occur during the salmon and/or herring processing seasons. These field measurements shall be taken at water column depths of 1 metre, 10 metres, and 20 metres measured from bottom and 0.5 metres measured from the water surface at the following locations: a) Lama Passage at outfall. b) McLoughlin Bay 150 metres west of outfall. c) Lama Passage 200 metres west of Archibald Point. Obtain measurements for the following: a) Dissolved Oxygen: mg/L. b) Temperature: Degrees Celsius. c) Electrical Conductivity: umhos/cm. d) pH: pH Units. e) Salinity: g/Kg.
Details/Findings:	Mr. Renwick informed ENV that there are no field measurements taking place at a) Lama Passage at outfall, b) McLoughlin Bay 150 metres west of outfall, or c) Lama Passage 200 metres west of Archibald Point.
Compliance:	Out
Actions to be taken:	Obtain field measurements twice per year at the required water column depths at the following locations: a) Lama Passage at outfall. b) McLoughlin Bay 150 metres west of outfall. c) Lama Passage 200 metres west of Archibald Point. Ensure that the measurements are taken for the following: a) Dissolved Oxygen: mg/L. b) Temperature: Degrees Celsius. c) Electrical Conductivity: umhos/cm. d) pH: pH Units. e) Salinity: g/Kg.

Requirement Description:	<p><b>3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring, 3.2.2 Sampling Location and Techniques</b></p> <p>3.2.2: The Permittee shall obtain a grab sample of the receiving water at 1 metre, measured from the bottom, from each of the above mentioned sites each time the required field measurements are conducted. Proper care should be taken in sampling, storing and transporting the samples to adequately control temperature and avoid contamination, breakage, etc. Sampling is to be carried out in accordance with procedures described in "Field Criteria for Sampling Effluents and Receiving Waters", April 1989, or by suitable alternative procedures as authorized by the Regional Waste Manager. Copies of the above mentioned manual are available from the Environmental Protection Division, Ministry of Environment, Lands and Parks, 777 Broughton Street, Victoria, British Columbia, V8V 1X5, at a cost of \$20.00, and are available for inspection at all Environmental Protection Offices.</p>
Details/Findings:	Mr. Renwick informed ENV that there are no grab samples being collected from the receiving water at a) Lama Passage at outfall, b) McLoughlin Bay 150 metres west of outfall, or c) Lama Passage 200 metres west of Archibald Point.
Compliance:	Out
Actions to be taken:	Obtain a grab sample of the receiving water at 1 metre, measured from the bottom at the following locations: a) Lama Passage at outfall. b) McLoughlin Bay 150 metres west of outfall. c) Lama Passage 200 metres west of Archibald Point.
Requirement Description:	<p><b>3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring, 3.2.3 Analysis</b></p> <p>3.2.3: Obtain analyses of the sample for the following: a) Ammonia: mg/L. Analyses are to be carried out in accordance with procedures described in the "British Columbia Environmental Laboratory Manual for the Analysis of Water, Wastewater, Sediment and Biological Materials, (March 1994 Permittee Edition)" or by suitable alternative procedures as authorized by the Regional Waste Manager. Copies of the above manual are available from the Queen's Printer Publication Centre, 2nd Floor, 563 Superior Street, Victoria, B.C. , V8V 4R6, at a total cost of \$101.65, \$80.00 for the electronic manual and license and \$21.65 for a hard copy of the manual, and are also available for inspection at all Environmental Protection Program Offices.</p>
Details/Findings:	Mr. Renwick informed ENV that there are no grab samples being analyzed for a) Ammonia: mg/L from a) Lama Passage at outfall, b) McLoughlin Bay 150 metres west of outfall, or c) Lama Passage 200 metres west of Archibald Point.
Compliance:	Out

Actions to be taken:	Obtain analyses of each of the grab samples collected in Section 3.2.2 for Ammonia: mg/L
Requirement Description:	<b>3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring, 3.2.4 Settleable Solids Monitoring</b> 3.2.4: The Permittee shall design and conduct a program to the satisfaction of the Regional Waste Manager to monitor settleable solids in McLaughlin Bay. This monitoring program shall be submitted to the Regional Waste Manager no later than June 30, 1995. Once approved, this monitoring program shall be conducted by December 31, 1995.
Details/Findings:	No monitoring program to monitor settleable solids in McLaughlin Bay could be located in the ENV files. When discussed, Mr. Renwick informed the ENV that no receiving environment monitoring is being conducted at the facility.
Compliance:	Out
Actions to be taken:	Ensure that a monitoring program to monitor settleable solids in McLaughlin Bay is designed and submitted to the Regional Waste Manager for approval and then conduct the approved monitoring program.
Requirement Description:	<b>3. MONITORING AND REPORTING REQUIREMENTS, 3.2 Receiving Environment Monitoring, 3.2.5 Sampling Protocol</b> 3.2.5: The permittee shall develop sampling protocol for all receiving environment monitoring. The protocol shall include sampling procedure, type of field instruments used, instrument calibration schedule and any other information deemed necessary by the Regional Waste Manager. The protocol is to be submitted by June 30, 1995, for the endorsement of the Regional Waste Manager. The protocol must be followed throughout the monitoring program.
Details/Findings:	No sampling protocol for receiving environment monitoring could be located in the ENV files. When discussed, Mr. Renwick informed the ENV that no receiving environment monitoring is being conducted at the facility; therefore, no sampling protocol is currently being followed at the facility.
Compliance:	Out



Actions to be taken:	Ensure that a sampling protocol for all receiving environment monitoring is developed and submitted to the Regional Waste Manager for approval. Once a sampling protocol is approved, follow the protocol throughout the monitoring program.
Requirement Description:	<b>3. MONITORING AND REPORTING REQUIREMENTS, 3.3 Reporting</b> 3.3: Maintain data of analyses and flow measurements for inspection and submit the data, suitably tabulated, to the Regional Waste Manager. All reports shall be submitted within 31 days of the end of the calendar year during which the monitoring program was carried out. The need for subsequent increased or decreased monitoring will be assessed on the basis of the monitoring data submitted and any other data gathered by Environmental Protection in connection with this discharge.
Details/Findings:	No data of analyses and flow measurements were submitted for 2016 and 2017.
Compliance:	Out
Actions to be taken:	Ensure that data of analyses and flow measurements from the monitoring program are submitted in an annual report within 31 days of the end of the calendar year during which the monitoring program was carried out to the Ministry's Routine Environmental Reporting Submission Mailbox at EnvAuthorizationsReporting@gov.bc.ca.

**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](mailto: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](http://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.