



Report Date: March 21, 2018

File: 8370

Report Number: 078886

Cape Scott Seafoods Limited
300 5251 Island Hwy
Qualicum Beach BC V9K 2C1

Dear Cape Scott Seafoods Limited:

Re: Non-compliance Advisory Letter, Permit 8370, Winter Harbour

On February 19, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an office review inspection of your facility, Cape Scott Seafoods Limited located at Winter Harbour Fish Buying and Processing Plant with authorization number 8370 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 Cape Scott Seafoods 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 - EFFLUENT (a): The discharge of effluent to which this appendix is applicable is from a fish buying and processing plant as shown on the attached Appendix A-1.
Details/Findings:	Rob Knutson, owner of Qualicum Rivers Winter Harbour Fishing Lodge and Resort, indicated that the facility is no longer processing fish, but is currently utilized as a fishing lodge and resort. The lodge and resort continued to discharge septic effluent in 2016 and 2017. The lodge and resort will not be operating in 2018.
Compliance:	In
Actions to be taken:	

Requirement Description:	APPENDIX 01 - EFFLUENT (b): The maximum rate at which effluent may be discharged is 14.0 m3/d.
Details/Findings:	There is no requirement to measure the rate of effluent discharge; therefore, compliance with this requirement is not determined. Rob Knutson indicated that no fish processing is taking place and therefore the discharge of septic effluent alone would be well below the maximum rate of 14.0 m3/d. He further indicated that the lodge and resort will not be operating in 2018.
Compliance:	Not Determined
Actions to be taken:	
Requirement Description:	APPENDIX 01 - EFFLUENT (c): The characteristics of the effluent shall be equivalent to or better than fine screened fish processing effluent plus typical septic tank effluent.
Details/Findings:	Rob Knutson indicated that the facility is no longer processing fish but continued to discharge septic tank effluent in 2016 and 2017.
Compliance:	In
Actions to be taken:	
Requirement Description:	APPENDIX 01 - EFFLUENT (d): The works authorized are coarse screened floor drains and fine (25 mesh) screens for the process wastewater, an 18 m3 septic tank for the domestic sewage, an outfall extending 100 m from mean low water to a depth of 12 m below mean low water, and related appurtenances approximately located as shown on the attached Appendix A-1.

Details/Findings:	Rob Knutson indicated that the 18 m3 septic tank required replacement and was replaced by three 3,000 US gallon septic tanks and a aeration tank. These works are not listed as authorized works.
Compliance:	Out
Actions to be taken:	Please ensure that all authorized works are constructed as specified in (d) APPENDIX 01 - EFFLUENT. In order to reflect the changes made to the authorized works, it is required that the Permittee request an amendment. Information on how to submit a amendment application can be found here: https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/change-authorizations .
Requirement Description:	APPENDIX B-1, A. MAINTENANCE OF WORKS A.: 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:	Rob Knutson indicated that the septic tanks and aeration tank are inspected and maintained in good working order.
Compliance:	In
Actions to be taken:	
Requirement Description:	APPENDIX B-1, B. BYPASSES B.: The discharge of effluent which has bypassed the authorized works is prohibited unless the approval of the Director or the Regional Waste Manager is obtained and confirmed in writing.
Details/Findings:	No bypasses of the authorized works occurred in 2016 or 2017.

Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	APPENDIX B-1, C. PROCESS MODIFICATIONS C.: 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:	The Permittee did not notify the Regional Waste Manager prior to modifying the authorized works from an 18 m3 septic tank to three 3,000 US gallon septic tanks and a aeration tank.
Compliance:	Out
Actions to be taken:	Ensure that if any process modifications are to be made to the authorized works, notify the Regional Waste Manager prior to implementing these changes.
Requirement Description:	APPENDIX B-1, D. SEPTIC TANK SLUDGE AND SCUM REMOVAL D.: Sludge and scum shall be removed from the septic tank annually, or at other frequencies as the Regional Waste Manager may allow, for disposal at a suitable site. The disposal arrangements are subject to the approval of the Regional Waste Manager. Records of sludge and scum removal should be maintained for inspection.
Details/Findings:	Rob Knutson indicated that the sludge and scum have been removed from the septic tank once during the past seven years and that has been sufficient. It can not be determined whether this frequency would be allowed by the Regional Waste Manager.
Compliance:	Not Determined
Actions to be taken:	

Requirement Description:	APPENDIX B-1, E. SCREENINGS E.: Screenings and other solid wastes from the fish unloading and processing operation shall be disposed of in a manner acceptable to the Regional Waste Manager.
Details/Findings:	Rob Knutson indicated that there is currently no fish processing taking place and therefore no screenings or other solid wastes are being produced.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	APPENDIX B-1, F. POSTING OF OUTFALL F.: The Permittee shall erect a sign along the alignment of the outfall above high water mark. The sign shall identify the nature of the works. The wording and size of the sign shall be approved by the Regional Waste Manager.
Details/Findings:	Rob Knutson indicated that there is no sign in alignment with the outfall identifying the nature of the works.
Compliance:	Out
Actions to be taken:	Erect a sign identifying the nature of the works along the alignment of the outfall above the high water mark.
Requirement Description:	APPENDIX B-2, G. OUTFALL INSPECTION G.: The Permittee shall conduct a dye test on the outfall line (or inspect by another method approved by the Regional Waste Manager) once every three years or as may otherwise be required by the Regional Waste Manager.
Details/Findings:	Rob Knutson indicated that no dye test of the outfall line has been conducted.

Compliance:	Out
Actions to be taken:	Ensure that a dye test of the outfall line is conducted once every three years.

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

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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.