

Use of Information Requirements Tables in the Routine Application Process for Waste Discharge Authorizations



Introduction

An Information Requirements Table (IRT) is an essential part of the application process for authorizations under the Environmental Management Act (EMA). IRTs list the technical information requirements that applicants need to include in their Technical Assessment Report and, if also specified, the Environmental Impact Assessment.

Template IRTs are available for the following authorization types:

1. Air emissions
2. Composting facilities (Organic Matter Recycling Regulation)
3. Fish processing plants
4. Hazardous waste (Hazardous Waste Regulation)
5. Effluent Discharge
6. Mining (all wastes)
7. Municipal liquid waste (Municipal Wastewater Regulation)
8. Oil and gas sector activities
9. Solid waste

Each template IRT provides a comprehensive list that covers the possible range of receiving environments, treatment and discharge methods, impact assessment tools, monitoring plans, and management plans for the activity, discharge, or regulation. As part of the preliminary application phase, ministry staff will help applicants understand which parts of the IRT apply to a specific application. For any given application, not all the items listed in the IRT form will apply and not all required items will warrant detailed discussion of methods and other concerns. Because the specific requirements of an application will be discussed at the preliminary application meeting, it is recommended that applicants bring their consultants and Qualified Professionals to the meeting.

Parts of the IRT

The IRTs have four columns (*see Figure 1 on following page*). These are:

1. **Information**
 - a. Section headers for groupings of information
 - b. Single lines of specific information requirements
2. **Requirements**
 - a. Check-box to indicate if the line item is required for the application or not
 - b. May have a "Methods" Check-box to indicate if specific methods must be used to fulfil the information requirement for that line
3. **Comments**
 - a. Records specific instructions to the applicant regarding the information requirements for that line, or provides guidance and references to assist the applicant
4. **Location in Final Application**
 - a. This column is not discussed or completed in the Preliminary Application Phase but is used when sending in the Final Application Package to indicate where in the package ministry reviewers can find the information related to the specific line.

Information	Required	Comments	Location in Final Application
1. PROJECT DESCRIPTION AND OVERVIEW			
This section is an introduction to the application and provides background information on the project			
1.1. Describe the proposed facilities and processes including ancillary facilities/activities such as storage, composting, laydown, sorting, segregation areas, etc.	Required <input type="checkbox"/>		

Figure 1: Columns in an IRT

How the IRT is used in the Routine Application Process

The Routine Application Process has the following phases:

1. Intake
2. Preliminary Application
3. Applicant Work Window
4. Screening (Administrative and Technical)
5. Review and Decision

The IRT applies to each phase as follows:

1. **Intake Phase**
 - ✓ Applicant may optionally provide a Draft IRT as part of their Preliminary Application, in order to expedite review by ministry staff.
2. **Preliminary Application Phase**
 - ✓ Depending on direction from ministry staff, either the applicant will be asked to create a draft IRT to inform the preliminary application meeting, or the ministry will create a draft for discussion purposes.
 - ✓ Preliminary application meeting(s), as needed, will occur to discuss the draft IRT and application.
 - ✓ The ministry signs and sends an Application Instruction Document (AID) with the Final IRT to the applicant.
3. **Applicant Work Window**
 - ✓ Applicant sends in a Final Application Package including a Final IRT with updated details in the "Location in Final Application" column to show where the information for each line is provided.
4. **Screening Phase**
 - ✓ The ministry screens the draft Final Application Package against the Final IRT to see if the required technical information is included, and to confirm that the AID requirements are met.
 - i. If there is information missing, the applicant will be asked to provide it.
 - ii. If the Final Application is complete, the applicant will be informed that the package has been accepted into the Review and Decision Phase.
5. **Review and Decision Phase**
 - ✓ If new information or concerns arise during the ministry's detailed review of the Final Application Package, new information may be requested. In extremely rare circumstances when substantial new information is needed to inform the review, lines may be added to the Final IRT for action by the applicant.
 - ✓ The Final IRT is used as part of the information package supplied to the Statutory Decision Maker for their consideration.

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Figure 2: Location in Final Application Column in an IRT

For more information please see: <https://forms.gov.bc.ca/environment/wda-enquiry/>