

Campbell River Environmental Committee

CREC, PO Box 20092 STN. A, Campbell River, B.C., V9W 7Z5

PO Box 9060 Stn Prov Govt,
V8W9E2

March 12, 2017

Dear Honourable Bill Bennett,

The Ministry of Mines has recently permitted contaminated soil to be used as reclamation in a sand and gravel and quarry operation.

That action does not comply with language in the Health, Safety and Reclamation Code for Mines in British Columbia and their Reclamation and Environmental Protection Handbook for Sand, Gravel and Quarry Operations in British Columbia, to which the ministries most recent handbook directs those who are applying.¹

The ministries own handbook states, "**Due to the porous nature of sand and gravel deposits, the use of pits and quarries as disposal sites is generally not permitted, since wastes can easily contaminate groundwater sources, surface water and soil.**"²

The same handbook also states, "**In fact, regulations in British Columbia require that you reclaim disturbed lands so that their productivity will eventually be equal to or greater than the capability or productivity of the land before it was disturbed.**"³

Are these enforceable rules or just recommendations? CREC seeks clarification on what the laws of the land are in this regard.

The handbook also states, "Under no circumstances should settled sediment, organic soil, landfill materials or domestic garbage be used as backfill material."⁴

Does the Ministry plan to comply with the handbook in the future?

The Campbell River Environmental Committee (CREC) realizes that the MoE permits landfill, but as landfill is ruled out in your application handbook, it should not be permitted.

The ministries reclamation code states that the average land capability is to be similar to the average that existed prior to mining.⁵

The deposit of contaminated soil for reclamation where none existed pre-mine cannot achieve reclamation. Surface and groundwater seepage is to be expected.

The practice of placing contaminated soil or landfill over class II high vulnerability aquifers is very concerning due to the contaminants travelling directly into the aquifer.

Liners are not reliable protection. Hydrocarbons degrade polyethylene liners and liner creep causes them to tear. Bentonite clay liners seep as demonstrated by other industries that use them.

CREC respectfully asks if the Minister plans to uphold the code and ensure that the deposit of contaminated soil or landfill is not permitted in sand and gravel and quarry operations, especially over a High Vulnerability Class 11A aquifer or in a drinking water watershed?

CREC respectfully requests a reply to our questions and stated concerns. Thank you.

Sincerely,
Campbell River Environmental Committee,
Per
Leona Adams, President
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1. Aggregate Operators Best Management Practices Handbook for British Columbia Volume 1, pg. 114
2. Reclamation and Environmental Protection Handbook for Sand, Gravel and Quarry Operations in British Columbia, pg. 77
3. Reclamation and Environmental Protection Handbook for Sand, Gravel and Quarry Operations in British Columbia, pg. 3
4. Reclamation and Environmental Protection Handbook for Sand, Gravel and Quarry Operations in British Columbia, pg. 134
5. Health, Safety and Reclamation Code for Mines in British Columbia, 10.7.5

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