

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

July 16, 2014

Re: Comment regarding Brown's Bay Packing Company Ltd application to amend Waste Permit PE-8124

Dear Ms. Adams,

The intent of the Brown's Bay Packing's wastewater amendment is to address necessary changes that have occurred to the process since the original permit was issued in 1989. Increased daily production and increased water usage from modernized processing equipment, as well as demands for improved sanitization, the capture of blood water from the fish farms, and improved water capture in and around the processing plant have increased the volume of water passing through Brown's Bay Packing's wastewater treatment process. Brown's Bay Packing has been open with the Ministry of Environment in regards to the changes that were made over the years, and has worked with the Ministry of Environment to develop a permit that will allow the company to meet its demands with minimal impact on the receiving environment. This permit was used as the guideline for designing the wastewater treatment system.

Below are responses to the concerns that were raised by Campbell River Environmental Committee:

Why was Brown's Bay Packing allowed to operate with process flows of 300m³, while the permit restricts flows to 28m³?

Please raise this concern with the Ministry of Environment

Why wasn't the treatment process designed to meet Best Aquaculture Practices?

The treatment process was designed to meet or exceed the requirements set out in the draft permit that was prepared by Brown's Bay Packing's regulating authority, the Ministry of Environment.

What is the remedy for the domestic wastewater BOD concentrations exceeding the draft permit value of 130mg/l?

When the Technical Assessment was written it was assumed that the domestic wastewater storage tank was simply a septic tank, but it is, in fact, a white water treatment plant. The blowers had failed and were not working at the time of the sampling. Shortly after those samples were taken the blowers were replaced and the treatment process was restored. Since then, the effluent BOD has been tested at 80mg/l. With regular monitoring and maintenance, the effluent BOD will remain below 130mg/l.

CREC is concerned with the risk of using chlorination/dechlorination treatment at Brown's Bay Packing. There is always a risk of mechanical or human error that could discharge chlorinated water to the bay.

Chlorination/dechlorination is a well established, common, reliable, and economical option for disinfection. It poses minimal risk to health and the environment when properly maintained, monitored and operated.

UV treatment to a 3 log reduction would be a better choice than Chlorine to disinfect the wastewater at Brown's Bay Packing.

Water being disinfected by UV treatment must be adequately free of color and turbidity to allow sufficient penetration. The color and turbidity of the wastewater stream at Brown's Bay Packing would make a 3 log reduction using UV treatment nearly impossible. Therefore, chlorination is the best option for disinfection.

Yours Truly,

Lorne Sandberg

H2Ops Water Services Inc