



Report Date: September 28, 2017

File: 10807

Report Number: 067228

UPLAND EXCAVATING LTD.
7295 GOLD RIVER HIGHWAY CAMPBELL RIVER
BC V9H 1P1

Dear UPLAND EXCAVATING LTD.,

Re: Notice Letter, Permit 10807, Upland Excavating Ltd. - Campbell River, Refuse

On September 11, 2017, Ministry of Environment, Environmental Protection Division staff conducted an inspection of your facility, UPLAND EXCAVATING LTD. located at Upland Excavating Ltd. - Campbell River with authorization number 10807 under the *Environmental Management Act*. Ministry staff were accompanied on site by Brian Fagan, Northwin Environmental Ltd.

Inspection Details:

Requirement Description:	Authorized Discharges and Related Requirements: Refuse 1.1.1: The maximum rate at which refuse may be discharged is 3200 m3/year.
Details/Findings:	On September 11, 2017, Ministry of Environment and Climate Change Strategy (ENV) Officer Laura Hunse (Officer) conducted an onsite inspection of Uplands Excavating with Ministry Officer Genevieve Huneault, accompanied by site operator Brian Fagan. According to Fagan, 2016/2017 landfill volumes were approximately 1310 m3, and the 2017/2018 fiscal volume to date is 1275 m3.
Compliance:	In
Actions to be taken:	
Requirement Description:	Authorized Discharges and Related Requirements: Refuse 1.1.2: The type of refuse which may be discharged is inert municipal.
Details/Findings:	In general, refuse discharged is inert municipal. Creosote logs have been brought on site and are being stored on the landfill site while characterization of the waste is taking place using the Hazardous Waste Regulation modified protocol for leachability (see Photo 1). Results and recommendations from the Qualified Professional will be discussed between ENV and Uplands prior to determining suitability for deposit of the creosote logs to the existing landfill. Section 8 of permit 10807 notes that, "In certain landfill environments, some construction and demolition debris, may create air and water quality concerns. If problems arise at this site that are attributable to specific wastes, the [Director] may require that alternate disposal procedures be implemented."
Compliance:	Not Determined
Actions to be taken:	Follow up with ENV upon receipt of analysis and Qualified Professional recommendations.
Requirement Description:	Authorized Discharges and Related Requirements: Refuse 1.1.3: The components of the refuse which may be discharged are stumps, trees, land clearing waste, selected building demolition debris, and residue of combustion from the open burning of woodwaste.

Details/Findings:	Refuse brought to the site is sorted prior to landfilling and inappropriate items removed and disposed of in an authorized manner or recycled. A very small amount of possible medical waste was noted on review of pictures from the inspection, though the source is unclear and disposal method appears inconsistent with standard site practice. The officer discussed the finding with Fagan and he notes screening of inbound material and staff education will be increased and site accessibility looked at. Materials consistent with demolition debris were noted at the site (Photos 2 and 3).
Compliance:	Not Determined
Actions to be taken:	Increase screening of inbound material and staff education as discussed; explore site access restriction as necessary.
Requirement Description:	Authorized Discharges and Related Requirements: Refuse 1.1.4: The works authorized are a landfill operation as directed, located approximately as shown on the attached Appendix A-1.
Details/Findings:	Appendix A-1 is hand drawn and approximate and cannot be used to determine compliance.
Compliance:	Not Determined
Actions to be taken:	An engineered drawing must be incorporated into the future operating certificated site plan.
Requirement Description:	Landfill Operation 3: The Permittee shall maintain the landfill as a Level E operation in accordance with the Pollution Control Objectives for Municipal Type Waste Discharges in British Columbia, dated September 1975, which, in normal conditions, requires that cover material be applied once per forty days of operation and at least once every two months. The Regional Waste Manager may vary the frequency of covering when freezing conditions or other circumstances affect normal operation.
Details/Findings:	Fagan is a SWANA (Solid Waste Association of North America) trained operator. Material is covered soon after it is deposited into the landfill.
Compliance:	In
Actions to be taken:	This clause should be updated with current standards in the future Operating Certificate.
Requirement Description:	Site Preparation and Restoration 4: Provision of fencing, site access, vehicle safety barriers, surface water diversionary works, firebreaks and site restoration as required, shall be carried out to the satisfaction of the Regional Waste Manager.
Details/Findings:	No general concerns were noted at the time of inspection.
Compliance:	In
Actions to be taken:	In relation to section 1.1.3, above, explore the need for fencing/site access restriction if appropriate.
Requirement Description:	Putrescible Waste 5: No putrescible wastes shall be discharged at this site.
Details/Findings:	No putrescible wastes were noted at the time of inspection.
Compliance:	In
Actions to be taken:	

Requirement Description:	Operational Requirements for Regulated Open Burning: Area 6 (a): The operation shall be restricted to an area on the site which is satisfactory to the Regional Waste Manager. If required, this area shall be fenced to restrict access to the burn area stockpile.
Details/Findings:	Stockpiles are confined to an area along the south boundary. Concerns around access were not noted at the time of inspection.
Compliance:	In
Actions to be taken:	
Requirement Description:	Operational Requirements for Regulated Open Burning: Quantity and Frequency 6 (b): The maximum quantity of wastes to be treated is 750 m3 per burn at a frequency not to exceed four burns per year. Each burn shall comprise one continuous period necessary to <u>reduce the stockpiled waste to ashes, and shall not exceed 48 hours.</u>
Details/Findings:	Fagan notes that volume is tracked by number of loads coming into the site to ensure 750 m3 is not exceeded per burn and that burns do not exceed 48 hours. Copies of burn permits issued by the City of Campbell River Fire Department were provided for February 2014 (2), December 2014, March 2015, November 2015, and November 2016.
Compliance:	In
Actions to be taken:	
Requirement Description:	Operational Requirements for Regulated Open Burning: Nature of Wastes 6 (c): Generally, no waste shall be burned which is unacceptable to the Regional Waste Manager. Acceptable materials may include stumps, trees and similar items, but exclude nuisance causing combustibles such as rubber, plastics, tars, insulation, etc. Demolition debris, excepting wood products, shall not be burned at this site. Burning of <u>any antisapstain treated wood products is prohibited.</u>
Details/Findings:	According to Fagan, stockpiles are sorted prior to burning for and inappropriate items removed (Photo 4).
Compliance:	In
Actions to be taken:	
Requirement Description:	Operational Requirements for Regulated Open Burning: Timing 6 (d): Burning shall take place only when an attendant is on duty and when conditions promote rapid combustion and dispersion of combustion products with a wind direction that conveys the resulting gases away from Mcivor Lake and Highway #28 (Gold River Highway) . Burning shall take place only when the ventilation index for the Campbell River area is forecasted to exceed 33 for the period of the burn. The ventilation index is issued by the Pacific Weather Centre, Environment Canada, Vancouver, telephone 664-9032. Materials shall be charged to the facility in a manner to promote best combustion and restrict the uplift of lighter constituents. No burning shall take place during periods of fire hazard or when burning is prohibited by other government agencies.
Details/Findings:	Burning is only conducted when the venting index allows for open burning and wind direction is favourable.
Compliance:	In
Actions to be taken:	

Requirement Description:	Operational Requirements for Regulated Open Burning: Fire Control 6 (e): Suitable approved devices shall be available for extinguishing fires to prevent them from spreading to surrounding areas. Such devices may include a pressurized water supply, chemical type fire extinguishers, or an earth stockpile. If an earth stockpile is contemplated for fire control, earth moving equipment shall be available at the site during burning. A fireguard shall be cleared and maintained free of combustible materials.
Details/Findings:	Fagan notes that during burns, an excavator is used to continually feed and manage the burn following ignition, the area around the burn pile is wetted prior to burning, water pumps at the site are on and primed, water trucks are at the ready if needed.
Compliance:	In
Actions to be taken:	
Requirement Description:	Operational Requirements for Regulated Open Burning: Residue of Combustion 6 (f): As soon as the residue of combustion has cooled to ambient temperature, it shall be incorporated into the adjacent landfill.
Details/Findings:	According to Fagan, combustion residue is incorporated into the landfill upon cooling.
Compliance:	In
Actions to be taken:	
Requirement Description:	Groundwater Monitoring Wells 7: The Permittee shall install not more than two groundwater monitoring wells. The number, locations and structural details of these facilities are subject to the approval of the Regional Waste Manager.
Details/Findings:	There are seven groundwater monitoring wells installed at the site.
Compliance:	In
Actions to be taken:	Ensure wording for this clause is changed in future Operating Certificate.

An application for an Operating Certificate (OC) to replace the existing permit is in the review and decision phase. An engineered, lined landfill with leachate collection, treatment and onsite discharge is addressed in the OC. Upon construction, the permittee plans to excavate and move the contents of the existing landfill to the new landfill.

Electronic Compliance History:
2012-01-05 Office Review Inspection - In Compliance

Please be advised that this inspection report may be published on the provincial website within 7 days.

Below are attachments related to this inspection.

If you have any questions about this letter, please contact the undersigned.

Yours truly,

Laura Hunse

Environmental Protection Officer

cc: Brady Nelles, Director, Compliance Section

Attachments:
1) 2017-09-11 Photo Record.pdf Photo Record

Deliver via:
Email: Fax: Mail:
Registered Mail: Hand Delivery:

Ministry of Environment	Compliance	Mailing Address:	Telephone: 250 751 3100
	Environmental	2080-A	Facsimile: 250 751 3103
	Protection Division	Labieux Rd Nanaimo BC V9E 6J9	Website: 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 or visit:
<http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publically%20Viewable%20A%20uthorizations>

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.

Authorization: 10807	Upland Excavating Ltd.
NRIS IR #: 67228	September 11, 2017 Site Inspection Photos

Photo 1
Lined landfill area with creosote logs.



Photo 2
Landfill area.



Authorization: 10807	Upland Excavating Ltd.
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Photo 3

Medical waste noted along interior ditching of landfill.



Photo 4

Burn stockpile. Non wood demo debris to be removed prior to burning.



Document : 2017-09-11 Photo Record.pdf

Document comment: Photo Record