

July 31, 2018

Campbell River Environmental Committee update re the Upland Excavating Ltd. Landfill Operational Certificate (OC) Application at 7295 Gold River Highway:

1. The Campbell River Environmental Committee (CREC) has concerns regarding the west/east groundwater divide under Upland's site, with west drainage to Rico Lake, which drains, in wet months, to McIvor Lake, our drinking water.
2. Dr. Wendling, Hydrogeologist working for the Campbell River Environmental Committee, recommends further studies to the west due to fractures in the bedrock aquifer.
Upland's 3rd party hydrogeologist, hired by upland, recommends more westward studies due to the possibility of a trough in the bedrock between Upland's pit and Rico Lake.
3. Upland have agreed to conduct additional studies to the west, but only after they receive the draft OC. They have also agreed to sediment test Rico Lake which was scheduled to happen in June. CREC has requested that Dr. Wendling be given time to review all studies before the 30-day comment notice in the paper for final OC.
4. Upland's consultant, GHD, left out southwest wells groundwater levels when identifying the direction of groundwater flow from the proposed landfill as southeast, away from the DFO Quinsam River Hatchery.
Using all of the groundwater elevation levels, Dr. Wendling identified the east divide groundwater flow to the east/northeast towards Lost Lake, Cold Creek and the Hatchery. Upland's third-party hydrogeologist recommended more studies towards Lost Lake, which is northeast of upland's site.
5. The base of the proposed landfill and the bottom of Rico Lake are both at 168 Meters Above Sea Level (MASL). The peak elevation of the landfill, including cover, is proposed at 195 MASL, far above the surface of Rico Lake measured at 180.4 MASL by Upland. As the waste in the landfill rises, leachate that Upland's report states can be temporarily stored within the landfill, can drain to Rico Lake if the liner fails. All liners seep and are known to fail. The proposed water management of ditches is proven not sufficient in other locations. Regarding the proposed bottom bentonite clay liner, in comparison, the bentonite clay liner under Quinsam Coal's 2 South Pit seeps approximately 50 cubic meters a day.
6. Upland's site is located on the watershed divide between the Campbell River and Quinsam River Watersheds according to the updated 2016 Ministry of Environment Freshwater Atlas and updated Water Resources Atlas.
7. An alternate site is the landfill at Discovery LNG, now approved by the Ministry of Environment (MOE) for deposit of waste from the public, similar to what Upland is applying for. CREC believes, although not perfect, this is a better option.
8. In 2017, MOE allowed creosoted timbers to remain deposited in the upper level of Upland's site, stating they could not enforce the permitted disposal location in Upland's pit. Compliance was found to be "Not Determined". CREC understands that BC Hydro plan to remove the creosoted penstocks in 2019. We do not believe they should be allowed to be deposited at Upland's site over or adjacent to our drinking water.
9. CREC has been advised by the Ministry of Environment that a draft OC may be issued to Upland.
The issue as CREC views it - is risk to your drinking water. Have your say by writing to the Ministry of Environment during the 30-day comment period after the draft OC is published in the local paper. One will also have the opportunity to comment to Mayor and Council at public hearing for zoning, should the MOE approve Upland's application.

Campbell River Environmental Committee,
Per,

Leona Adams,
President, CREC