



Report Date: December 13, 2018

File: HW109944

Report Number: 109944

REGISTERED MAIL

SKOOKUMCHUCK PULP INC.

PO Box 4000
Cranbrook, BC
V1C 7J7

Dear SKOOKUMCHUCK PULP INC.

Re: Non-compliance Advisory Letter, Hazardous Waste Regulation HW109944, 4501 Farstad Way, Skookumchuck BC, Hazardous Waste

On November 20, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an inspection of your facility, SKOOKUMCHUCK PULP INC. located at 4501 Farstad Way, Skookumchuck BC with authorization number HW109944 under the *Environmental Management Act*.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of SKOOKUMCHUCK PULP INC., and will be taken into account in the event of future non-compliance.

Please note that this authorization is considered to be out of compliance until such a time as it can be confirmed to meet the authorization requirements.

Inspection Details:

Requirement Description:	Environmental Management Act, Hazardous Waste Regulation (63/88) (EMA) 45.1 (2)(c)(i): A person must not cause or allow hazardous waste to be transported unless the person classifies the waste in the following manner: (c) if the waste is hazardous waste within the meaning of section 1 and is subject to the federal dangerous goods regulations the person (i) includes the following information on the manifest: (A) the shipping name; (B) the UN number; (C) the class; (D) either the packing group or the infectious substance category, as applicable, and
Details/Findings:	On November 20, 2018, Ministry of Environment & Climate Change Strategy (Ministry) Environmental Protection Officer Taylor White conducted a site inspection of the Skookumchuck Pulp Inc. bleached kraft pulp mill located near Skookumchuck, BC. As part of the inspection, Officer White observed the gated hazardous waste storage area and the waste oil storage area in order to assess compliance with requirements of the Hazardous Waste Regulation (B.C. Reg 63/88). Accompanying Officer White during the inspection was Brandy Craig (Environmental Coordinator, Skookumchuck Pulp Inc.). In addition to the site inspection, Officer White requested a copy of recent manifests used to transport hazardous waste off site. Ms. Craig submitted manifests BM64180-4, BM31240-4, and BM24363-6 on November 22, 2018. All three manifests were used for the transportation of waste oil. The shipping name was included on the manifests, as required.

Compliance:	In
Requirement Description:	Environmental Management Act, Hazardous Waste Regulation (63/88) (EMA) 50 (3)(a): A person who uses a container to store or transport hazardous waste must (a) keep the container closed at all material times during storage or transport,
Details/Findings:	During the site inspection, hazardous waste in the gated storage area was observed in open containers (Photo 1).
Compliance:	Out
Actions to be taken:	Ensure all containers used to store or transport hazardous waste are closed at all material times during storage and transport.
Requirement Description:	Environmental Management Act, Hazardous Waste Regulation (63/88) (EMA) 50 (3)(b): A person who uses a container to store or transport hazardous waste must (b) not open, handle, store or transport the container in a manner which may cause it to leak or rupture, and
Details/Findings:	Hazardous waste containers observed during the site inspection were stored in a fenced and locked area behind the carpentry shop. Containers were stored upright on shelves and no leaks were observed.
Compliance:	In
Requirement Description:	Environmental Management Act, Hazardous Waste Regulation (63/88) (EMA) 50 (3)(c): A person who uses a container to store or transport hazardous waste must (c) ensure that the outside of the container is clearly labeled with the shipping name of the hazardous waste it contains and, if the hazardous waste is a dangerous good, the class and UN number of that hazardous waste, both as set out in the federal dangerous goods regulations.

Details/Findings:	Some hazardous waste observed during the site inspection was not clearly labelled with the shipping name, and class and UN number where applicable (Photos 1, 2).
Compliance:	Out
Actions to be taken:	Ensure the outside of all containers used to store or transport hazardous waste is clearly labeled with the shipping name of the hazardous waste it contains. If the hazardous waste is a dangerous good, ensure the label includes the class and UN number of that hazardous waste, both as set out in the federal dangerous goods regulations.

Compliance History:
This is the first electronic compliance record under the Hazardous Waste Regulation for this facility, since January 1, 2012.

Please be advised that this inspection report may be published on the provincial government 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,

Taylor White
Environmental Protection Officer

cc:

Attachments:

- 1) IMG_2618.jpg Photo 1. Hazardous waste container without lid. Unlabeled wastes.
- 2) IMG_2617.jpg Photo 2. Unlabeled containers storing hazardous waste.

Deliver via:

Email: **Fax:** **Mail:**
Registered Mail: **Hand Delivery:**

**Ministry of Environment
and Climate Change
Strategy**

Compliance
Environmental
Protection Division

Mailing Address:
205 Industrial Rd G
Cranbrook BC V1C 7G5

Telephone: 250 489 8540
Facsimile: 250 489 8506
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.

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.



Img : IMG_2618.jpg

Img comment: Photo 1. Hazardous waste container without lid. Unlabeled wastes.



Img : IMG_2617.jpg

Img comment: Photo 2. Unlabeled containers storing hazardous waste.