Re: Discharge Factors Application – Authorization # 111019/ Tracking # 409424

Dear Mr Long,

I am opposed to the discharge of any effluent into the already ecologically-damaged Cowichan Estuary. This estuary at one time was the food basket of the Cowichan Tribes people. It is now an ecological disaster zone.

Before I proceed further, I have a question: What has Western Forest Products been doing with its effluent prior to now? Was it simply discharged into the estuary?

Your application is for an indeterminate amount of discharge. I find this strange since your sawmill has been producing effluent since the day it was established and you must have some idea of what the maximum daily and total annual effluent production would be.

The effluent to be discharged by your mill would have a maximum BOD of 45 mg/L, a maximum TSS of 60 mg/L and up to 10 mg/L of oil/grease. However, you have not provided a chemical analysis of the discharge – one has no idea what the concentration of metals would be, whether ammonia or chlorine is present. There is no information as to what hydrocarbons would be in the oil/grease component. Before this application is considered any further a full-spectrum chemical analysis of the effluent must be carried out by an accredited analytical laboratory.

The BC Municipal Waste Water has clear regulations on what is allowed to be discharged into marine environments, particularly in closed off environments such as bays and estuaries.

- i) Firstly, it must be determined that the effluent to be discharged is not acutely lethal to fish. This is done by placing trout in the effluent to be discharged for a period of 72 hours and if more than 50% die, the effluent cannot be discharged. This analysis must be done by an accredited laboratory.
- ii) The maximum BOD can be no more than 10 mg/L, considerably lower than what is proposed in your application.
- iii) The maximum TSS can be no more than 10 mg/L, considerably lower than what is proposed in your application.
- iv) The maximum daily discharge cannot exceed 50 m<sup>3</sup>.

Your application should be denied. We need to recover the estuary to its former ecological health, not damage it further.

B. Junki

Bernhard H.J. Juurlink 683 Butterfield Road, Mill Bay





### **Discharge Factors Application Form**

for authorization to discharge waste under the Environmental Management Act

### New Permit, Approval, or Operational Certificate

### FORM REFERENCE CODE: EPD-EMA-03.2

#### **INSTRUCTIONS:**

The application process is comprised of multiple steps that requires submission of a preliminary application and fee, followed by meetings with Ministry staff, and submission of a final application. This form may be used in conjunction with the submission of an Application for a new Permit, Approval or Operational Certificate (Form EPD-EMA-02).

Before completing this application form, please review the following:

- Waste Discharge Regulation under the Environmental Management Act at <u>www.bclaws.ca;</u> and,
- Ministry information and guidance documents that will assist in understanding the registration process and any
  other documents that may be required at
  <a href="http://www2.gov.bc.ca/gov/content?id=0876E90DA4744A449423D35EB4E09785">http://www2.gov.bc.ca/gov/content?id=0876E90DA4744A449423D35EB4E09785</a>.

It is preferred that this form is completed using a computer or typewriter. If completing this form by hand, please PRINT clearly.

Mandatory fields are marked with an asterisk (\*). Please ensure all required fields are completed or the application form may not be accepted.

Once the final application has been submitted, the application will proceed through the Screening Phase to verify administrative and technical completeness.

A Pre-Authorization Number and Tracking Number has been assigned to this request. Both numbers should be referenced on all documents submitted to support the new application request.

Under *Environmental Management Act, a* person is prohibited from introducing waste into the environment without authorization. Submitting an application to discharge is NOT an authorization to discharge.

This application can be submitted to the Ministry by email (preferred), mail or by courier.

Mail or Email	Courier
Environmental Protection Division	Ministry of Environment & Climate Change Strategy
Business Services	Environmental Protection Division
PO Box 9377 Stn Prov Govt	Business Services Branch
Victoria, BC V8W 9M6	3rd Floor, 525 Superior Street
Email: <u>PermitAdministration.VictoriaEPD@gov.bc.ca</u>	Victoria, BC V8V 0C5



### **Section 1: Application Information**

*Tracking Number	1
*Pre-Authorization Number	2
*Applicant Name	3
*Facility Name	4
*Number of discharge points	7

A copy of Section 2 must be completed for each discharge point. I.e. If there are three points of discharge, there should be three copies of Section 2 completed and submitted.



* <b>Discharge Name</b> e.g. Planer Mill Cyclone #2			1
*Discharge Type	Air Effluent Refuse		2
*Site ID as Referenced on Site Map <sup>1</sup> e.g. Site A			3
Additional description (if needed)			4
Proposed treatment method and equipment to be used e.g. UV Disinfection, baghouse			5
Discharge location description e.g. end of pipe, landfill, stack #1,etc			6
*Discharge location position i.e. end of pipe coordinates must be in decimal degree format to 4 decimal places	Latitude (e.g., 49.8952) N	Longitude (e.g., 116.8177) W	7
*Source of Data	<ul> <li>□ GPS</li> <li>□ Survey</li> <li>□ Google E</li> <li>□ Other (specify):</li> </ul>	arth	8
If the Legal Land Description	for the facility location is different than t	his discharge location	
Legal Land Description (Lot/Block/Plan) <mark>OR</mark> PID/PIN/Crown File No.			9

<sup>&</sup>lt;sup>1</sup> For each point of discharge, there must be a corresponding point displayed on a map using the Site Form (Form EPD-EMA-09.1).



INSTRUCTIONS: Complete the maximum rate of discharge, and if applicable, the minimum, and/or average rate. Typically, only a maximum is needed. Include the duration of the discharge (e.g., hours/day) and the frequency of the discharge (e.g., days/week, days/month or days/year). Typically, a discharge may start when the authorization is issued and continues until the authorization is cancelled. If this discharge is to be time limited, this should be discussed at your pre-application meeting. All units are to be in System International (SI) metric units.

Minimum Discharge Rate <sup>+</sup>	Average Discharge Rate	Maximum Discharge Rate	Units (e.g. m <sup>3</sup> /day)	Duration	Duration Units (e.g. hrs/day)	Frequency	Frequency units (days/weeks)
+ For composting fac	cilities, maximum annu	al production capacity	 /				

#### \*Table B: Proposed Contaminant Concentrations

INSTRUCTIONS: The contaminant data should be the characteristics of the waste when it enters the environment. Guidance on acceptable discharge quality may be found in applicable Provincial and Federal Regulations, Objectives, Guidelines, Criteria, Policies, Codes of Practice, Best Achievable Control Technology (BACT), Best Management Practices and, in some cases, draft documents.

Enter the contaminant and its maximum concentration and if applicable, the minimum, and/or average concentrations. All units are to be SI metric units. If the contaminant is to be discharged for a period less than the life of the authorization, enter the start and/or end dates. All air discharge rates are to be corrected to 20°C, 1 atmosphere pressure, and zero water vapour.

Parameter or Contaminant Name <sup>i</sup>	Minimum Concentration	Average Concentration	Maximum Concentration	Units (e.g. mg/L)



*Discharge Name e.g. Planer Mill Cyclone #2	Outfall #2		1	
*Discharge Type	🗋 Air 🔀 Effluent 🔲 Refuse		2	
*Site ID as Referenced on Site Map <sup>1</sup> e.g. Site A	Outfall 2		3	
Additional description (if needed)	Drainage on the south side of the site.		4	
Proposed treatment method and equipment to be used e.g. UV Disinfection, baghouse	Effluent goes through an oil/water separator before being discharged		5	
Discharge location description e.g. end of pipe, landfill, stack #1,etc	End of pipe		6	
*Discharge location position i.e. end of pipe coordinates must be in decimal degree format to 4 decimal places	Latitude (e.g., 49.8952) N 48.7603	Longitude (e.g., 116.8177) W -123.6402	7	
*Source of Data	GPS Survey Socie E	arth	8	
If the Legal Land Description for the facility location is different than this discharge location				
Legal Land Description (Lot/Block/Plan) OR PID/PIN/Crown File No.			9	

<sup>&</sup>lt;sup>1</sup> For each point of discharge, there must be a corresponding point displayed on a map using the Site Form (Form EPD-EMA-09.1).



INSTRUCTIONS: Complete the maximum rate of discharge, and if applicable, the minimum, and/or average rate. Typically, only a maximum is needed. Include the duration of the discharge (e.g., hours/day) and the frequency of the discharge (e.g., days/week, days/month or days/year). Typically, a discharge may start when the authorization is issued and continues until the authorization is cancelled. If this discharge is to be time limited, this should be discussed at your pre-application meeting. All units are to be in System International (SI) metric units.

n (e.g. hrs/day) Frequency	(days/weeks)
hrs/day 7	days/week

\*Table B: Proposed Contaminant Concentrations

INSTRUCTIONS: The contaminant data should be the characteristics of the waste when it enters the environment. Guidance on acceptable discharge quality may be found in applicable Provincial and Federal Regulations, Objectives, Guidelines, Criteria, Policies, Codes of Practice, Best Achievable Control Technology (BACT), Best Management Practices and, in some cases, draft documents.

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Parameter or Contaminant Name	Minimum Concentration	Average Concentration	Maximum Concentration	Units (e.g. mg/L)
BOD			45	mg/L
TSS			60	mg/L
Oil and Grease			10	mg/L
рН	6.0		8.5	



*Discharge Name e.g. Planer Mill Cyclone #2	Outfall #3		1
*Discharge Type	🗋 Air 🔀 Effluent 🔲 Refuse		2
*Site ID as Referenced on Site Map <sup>1</sup> e.g. Site A	Outfall 3		3
Additional description (if needed)	Drainage on the south side of the site		4
Proposed treatment method and equipment to be used e.g. UV Disinfection, baghouse	Effluent goes through an oil/water separator before being discharged		5
Discharge location description e.g. end of pipe, landfill, stack #1,etc	End of pipe		6
*Discharge location position i.e. end of pipe coordinates must be in decimal degree format to 4 decimal places	Latitude (e.g., 49.8952) N 48.7603	Longitude (e.g., 116.8177) W -123.6395	7
*Source of Data	GPS Survey Socie E Other (specify):	arth	8
If the Legal Land Description	for the facility location is different than t	his discharge location	
Legal Land Description (Lot/Block/Plan) OR PID/PIN/Crown File No.			9

<sup>&</sup>lt;sup>1</sup> For each point of discharge, there must be a corresponding point displayed on a map using the Site Form (Form EPD-EMA-09.1).



INSTRUCTIONS: Complete the maximum rate of discharge, and if applicable, the minimum, and/or average rate. Typically, only a maximum is needed. Include the duration of the discharge (e.g., hours/day) and the frequency of the discharge (e.g., days/week, days/month or days/year). Typically, a discharge may start when the authorization is issued and continues until the authorization is cancelled. If this discharge is to be time limited, this should be discussed at your pre-application meeting. All units are to be in System International (SI) metric units.

n (e.g. hrs/day) Frequency	(days/weeks)
hrs/day 7	days/week

\*Table B: Proposed Contaminant Concentrations

INSTRUCTIONS: The contaminant data should be the characteristics of the waste when it enters the environment. Guidance on acceptable discharge quality may be found in applicable Provincial and Federal Regulations, Objectives, Guidelines, Criteria, Policies, Codes of Practice, Best Achievable Control Technology (BACT), Best Management Practices and, in some cases, draft documents.

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Parameter or Contaminant Name	Minimum Concentration	Average Concentration	Maximum Concentration	Units (e.g. mg/L)
BOD			45	mg/L
TSS			60	mg/L
Oil and Grease			10	mg/L
рН	6.0		8.5	



*Discharge Name e.g. Planer Mill Cyclone #2	Outfall #4		1
*Discharge Type	🗋 Air 🔀 Effluent 🔲 Refuse		2
*Site ID as Referenced on Site Map <sup>1</sup> e.g. Site A	Outfall 4		3
Additional description (if needed)	Drainage on the south side of the site		4
Proposed treatment method and equipment to be used e.g. UV Disinfection, baghouse	Effluent goes through an oil/water separator before being discharged		5
Discharge location description e.g. end of pipe, landfill, stack #1,etc	End of pipe		6
*Discharge location position i.e. end of pipe coordinates must be in decimal degree format to 4 decimal places	Latitude (e.g., 49.8952) N 48.7603	Longitude (e.g., 116.8177) W -123.6393	7
*Source of Data	GPS Survey Scoogle E	arth	8
If the Legal Land Description	for the facility location is different than the the second s	his discharge location	
Legal Land Description (Lot/Block/Plan) OR PID/PIN/Crown File No.			9

<sup>&</sup>lt;sup>1</sup> For each point of discharge, there must be a corresponding point displayed on a map using the Site Form (Form EPD-EMA-09.1).



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n (e.g. hrs/day) Frequency	(days/weeks)
hrs/day 7	days/week

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INSTRUCTIONS: The contaminant data should be the characteristics of the waste when it enters the environment. Guidance on acceptable discharge quality may be found in applicable Provincial and Federal Regulations, Objectives, Guidelines, Criteria, Policies, Codes of Practice, Best Achievable Control Technology (BACT), Best Management Practices and, in some cases, draft documents.

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Parameter or Contaminant Name	Minimum Concentration	Average Concentration	Maximum Concentration	Units (e.g. mg/L)
BOD			45	mg/L
TSS			60	mg/L
Oil and Grease			10	mg/L
рН	6.0		8.5	



*Discharge Name e.g. Planer Mill Cyclone #2	Outfall #5		1
*Discharge Type	🗋 Air 🔀 Effluent 🔲 Refuse		2
*Site ID as Referenced on Site Map <sup>1</sup> e.g. Site A	Outfall 5		3
Additional description (if needed)	Drainage on the southeast side of the site		4
Proposed treatment method and equipment to be used e.g. UV Disinfection, baghouse	Effluent goes through an oil/water separate	or before being discharged.	5
Discharge location description e.g. end of pipe, landfill, stack #1,etc	End of pipe		6
*Discharge location position i.e. end of pipe coordinates must be in decimal degree format to 4 decimal places	Latitude (e.g., 49.8952) N 48.7602	Longitude (e.g., 116.8177) W -123.6371	7
*Source of Data	GPS Survey Socie Ea Other (specify):	arth	8
If the Legal Land Description	for the facility location is different than the	nis discharge location	
Legal Land Description (Lot/Block/Plan) OR PID/PIN/Crown File No.			9

<sup>&</sup>lt;sup>1</sup> For each point of discharge, there must be a corresponding point displayed on a map using the Site Form (Form EPD-EMA-09.1).



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Parameter or Contaminant Name	Minimum Concentration	Average Concentration	Maximum Concentration	Units (e.g. mg/L)
BOD			45	mg/L
TSS			60	mg/L
Oil and Grease			10	mg/L
рН	6.0		8.5	



* <b>Discharge Name</b> e.g. Planer Mill Cyclone #2	Outfall #6		1
*Discharge Type	🗖 Air 🔀 Effluent 🔲 Refuse		2
*Site ID as Referenced on Site Map <sup>1</sup> e.g. Site A	Outfall 6		3
Additional description (if needed)	Drainage on the southeast side of the site		4
Proposed treatment method and equipment to be used e.g. UV Disinfection, baghouse			5
Discharge location description e.g. end of pipe, landfill, stack #1,etc	End of pipe		6
*Discharge location position i.e. end of pipe coordinates must be in decimal degree format to 4 decimal places	Latitude (e.g., 49.8952) N 48.7602	Longitude (e.g., 116.8177) W -123.6369	7
*Source of Data	GPS Survey Scoogle Ea	arth	8
If the Legal Land Description	for the facility location is different than the	nis discharge location	
Legal Land Description (Lot/Block/Plan) OR PID/PIN/Crown File No.			9

<sup>&</sup>lt;sup>1</sup> For each point of discharge, there must be a corresponding point displayed on a map using the Site Form (Form EPD-EMA-09.1).



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n (e.g. hrs/day) Frequency	(days/weeks)
hrs/day 7	days/week

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Parameter or Contaminant Name	Minimum Concentration	Average Concentration	Maximum Concentration	Units (e.g. mg/L)
BOD			45	mg/L
TSS			60	mg/L
Oil and Grease			10	mg/L
рН	6.0		8.5	



### **Section 3: Receiving Environment Characteristics**

Where a technical assessment of the discharge is not required by the Director, details of the receiving environment are to be listed here. If necessary, provide the information as an appendix to the application form. If a technical assessment is required, completion of this section is preferred, but optional. However, the details and supporting information to describe the receiving environment must be discussed in the technical assessment report.

#### Brief description of the receiving environment

e.g. name, description and characteristics of the water body, aquifer or airshed

# Section 4: Distance to Nearest Specified Features

All measurements in metres

Water well	m
Reservoir	m
Dwelling	m

Serviced Lot	m
Recreational Area	m
Residential or Health Care Facility	m

Park or Protected Area	m
School or Daycare	m
Surface water (lake, stream, marine)	m