



Report Date: August 07, 2018

File: UA 90086

Report Number: 090086

REGISTERED MAIL

93 Land Company

4430 Hullcar Road

Armstrong, BC

V0E 1B4

Dear 93 Land Company

Re: Warning Letter, Unauthorized Discharge, 1582 Bradner Road, Abbotsford BC, Refuse

On June 12, 2018, Ministry of Environment, Environmental Protection Division staff conducted an inspection of your facility, located at 1582 Bradner Road, Abbotsford BC. The inspection determined that 93 Land Company is out of compliance with the *Environmental Management Act*, Part 2 Prohibitions and Authorizations, Section 6(2) waste disposal. This Warning Letter lists the compliance verification information below.

By discharging waste under Environmental Management Act without a valid authorization 93 Land Company commits an offence under the *Environmental Management Act (EMA)*. Section 120(3) of *EMA* states as follows:

120(3) A person who contravenes any of the following commits an offence and is liable on conviction to a fine not exceeding \$1 000 000 or imprisonment for not more than 6 months, or both: (a) section 6 (2), (3) or (4) [waste disposal];...

It should also be noted that, as an alternative to prosecution of the offence referenced above, the Ministry may initiate action to impose an administrative penalty against 93 Land Company. The Administrative Penalties Regulation (EMA) (B.C. Reg. 133/2014) (APR) was brought into force in 2014. The APR describes the prescribed provisions of the EMA as well as that of specified regulations under which administrative penalties can be assigned. Section 12(1) of the APR states as follows:

12(1) A person who contravenes section 6 (2), (3) or (4), 7, 8, 9 (1) or (4), 11, 25 (2), 40 (1), (2), (3), (6) or (7), 48 (8), (10) or (15), 55 (1), 72 (1) or (2) or 76.2 of the Act is liable to an administrative penalty not exceeding \$75 000.

I request that 93 Land Company immediately implement the necessary changes or modifications to correct the non-compliance(s) listed above with the *Environmental Management Act*. Further, I request that 93 Land Company notify this office in writing, by email or letter within 30 days of this letter, advising what corrective measures have been taken, and what else is being done, to prevent similar non-compliances in the future.

Please submit your response to the Ministry's Compliance Mailbox at EnvironmentalCompliance@gov.bc.ca.

As a result of this Warning, this authorization will be prioritized for follow-up inspection. The corrective measures will be reviewed by an Officer as part of the next inspection.

Finally, if you fail to take the necessary actions to restore compliance, you may be subject to escalating enforcement action. This Warning Letter and the alleged violations and circumstances to which it refers, will form part of the compliance history of 93 Land Company and will be taken into account in the event of future violations.

93 Land Company failed to comply with the *Environmental Management Act*, section 6(2) as outlined below.

**Ministry of Environment
and Climate Change
Strategy**

Compliance
Environmental
Protection Division

Mailing Address:
2nd Fl
10470-152nd St
Surrey BC V3R 0Y3

Telephone: 604 582 5200
Facsimile: 604 930 7119
Website: www.gov.bc.ca/env

Inspection Details:

Requirement Description:	<p>Environmental Management Act, Environmental Management Act</p> <p>6 (2): Subject to subsection (5), a person must not introduce or cause or allow waste to be introduced into the environment in the course of conducting a prescribed industry, trade or business.</p>
Details/Findings:	<p>On June 25, 2018, Ministry of Environment and Climate Change Strategy (ENV) Officers Paterson and Howett performed an inspection of the 93 Land Company (the Business) operation located at 15825 Bradner Road, Abbotsford BC. The inspection was conducted as a follow-up to ENV Inspection Report (IR) 77582 and accompanying Warning Letter of Noncompliance, issued on February 01, 2018.</p> <p>The Business operates as an agricultural waste storage/management/sales facility, receiving poultry manures from multiple farms in Chiliwack and Abbotsford, storing and mechanically turning the agricultural waste for an undefined period of time, until it is transported for sale to customers in BC and the USA for application as a fertilizer. Selling the agricultural waste is considered an introduction of waste into the environment.</p> <p>The described activities fall under the Waste Discharge Regulation (WDR) Schedule One industry 'Commercial Waste Management' which is defined as, "establishments primarily engaged in the commercial collection, handling, storage, treatment, destruction or disposal of waste soil, solids or liquids".</p> <p>Industries, trades, businesses, operations and activities listed in Schedule One of the WDR are generally authorized through the use of regulations or site specific authorizations. Specific related EMA legislation fitting the described operation of the Business include the Organic Matter Recycling Regulation (OMRR).</p> <p>The Business is not operating in accordance with OMRR and does not hold a valid authorization under EMA, therefore out of compliance with EMA 6 (2).</p>
Compliance:	Out
Actions to be taken:	<p>Implement the necessary changes or modifications immediately to address this situation and to bring it into compliance.</p> <p>Notify this office by email or letter within 30 days of this letter, advising what corrective measures have been taken, and what else is being done, to bring this authorization into compliance.</p> <p>Information about how to apply for a waste discharge authorization can be found at: https://www2.gov.bc.ca/gov/content/environment/waste-management/wastedischargeauthorization</p>

Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 4: Agricultural waste may be stored on a farm only if the waste is produced or used on that farm.
Details/Findings:	The Business stores agricultural waste received from multiple other local farms. The agricultural waste is stored at the Business for an unknown time period until it is transported off-site for application as a fertilizer. The agricultural waste is not produced or used on the farm, therefore the Business out of compliance with this requirement.
Compliance:	Out
Actions to be taken:	Implement the necessary changes or modifications immediately to address this situation and to bring it into compliance.
Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 5 (a): When agricultural waste is stored, it must be stored (a) in a storage facility,
Details/Findings:	On June 25, 2018 Officers Paterson and Howett observed agricultural waste being stored inside of two storage structures at the Business. Additionally waste was observed being stored uncovered on the concrete pad outside of the storage facilities. The structures used as storage facilities at the Business consist of fabric roofing cover, a concrete floor and concrete block walls.
Compliance:	Out

Actions to be taken:	Implement the necessary changes or modifications immediately to address this situation and to bring it into compliance.
Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 6 (a): A storage facility must (a) be of sufficient capacity to store all the agricultural waste produced or used on the farm for the period of time needed to allow for (i) the application of agricultural waste as a fertilizer or soil conditioner, or (ii) the removal of agricultural waste,
Details/Findings:	The waste stored at the Business is not produced or used on the farm therefore this requirement is not applicable.
Compliance:	Not Applicable
Actions to be taken:	N/A
Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 6 (b): A storage facility must (b) prevent the escape of any agricultural waste that causes pollution, and
Details/Findings:	During the inspection on June 25, 2018, the storage facilities appeared to be constructed in a manner to prevent the escape of waste. Small amounts of leachate was observed escaping through the lock block walls of the east structure during the inspection (see photos attached). Neither storage structure was inspected from the inside because they were too full of material to allow safe entry. The west wall of the western storage structure was not observed from the outside due to vegetation growth.
Compliance:	Not Determined
Actions to be taken:	Ensure agricultural waste does not escape the storage facilities.

Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 7 (1): A storage facility must be located at least 15 m from any watercourse and 30 m from any source of water for domestic purposes.
Details/Findings:	An iMapBC query on June 26, 2018 revealed no drinking water wells or watercourses within the required setback distances.
Compliance:	In
Actions to be taken:	None
Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 11: Agricultural waste must not be directly discharged into a watercourse or groundwater.
Details/Findings:	During the on-site inspection on June 25, 2018 Officers Paterson and Howett observed a dried runoff ditch containing small amounts of agricultural waste on the north side of the eastern storage facility. This appeared to present a pathway for runoff containing agricultural waste from the eastern storage facility however no discharge to water was observed during the inspection.
Compliance:	Not Determined
Actions to be taken:	Ensure agricultural waste does not discharge into a watercourse or groundwater.

Compliance History:
2018-02-01 Warning - Non-compliant with section 4, 5(a), 11 and N/D for 6(b) and 7(1) of the Agricultural Waste Control Regulation.
2017-10-17 Advisory - Failure to adhere to sections 4 and 5 of the Agricultural Waste Control Regulation.

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 warning, please contact the undersigned.

Yours truly,

Stewart Paterson
Environmental Protection Officer

cc:

Attachments:
1) 2018-06-25 Photo Record - 93 Land Company.pdf Photolog IR90086

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

Ministry of Environment and Climate Change Strategy	Compliance Environmental Protection Division	Mailing Address: 2nd Fl 10470-152nd St Surrey BC V3R 0Y3	Telephone: 604 582 5200 Facsimile: 604 930 7119 Website: www.gov.bc.ca/env
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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.

Authorization: UA68121	Facility: 93 Land Company	15825 Bradner Road, Abbotsford BC
NRIS IR #:	Date: June 25, 2018	

Photo 1

Agricultural waste being stored in one of two storage facilities at the business.

Photo taken facing south.



Photo 2

Agricultural waste being stored in the second of two storage facilities at the business.

Photo taken facing west.



Authorization: UA68121	Facility: 93 Land Company	15825 Bradner Road, Abbotsford BC
NRIS IR #:	Date: June 25, 2018	

Photo 3

Agricultural waste stored outside the storage facility.





Photo 4

Dried manure debris observed off the cement pad of the east building, and off the gravel pad, entering the ditch. No flow of water during inspection.



Authorization: UA68121	Facility: 93 Land Company	15825 Bradner Road, Abbotsford BC
NRIS IR #:	Date: June 25, 2018	

<p>Photo 5</p> <p>Leachate seeping under south lock block wall of the east building.</p>	
<p>Photo 6</p> <p>Leachate seeping under lock block of the east building and dried residue indicating leachate has left cement pad.</p>	

Document : 2018-06-25 Photo Record - 93 Land Company.pdf

Document comment: Photolog IR90086



Report Date: October 17, 2017

File: UA68121

Report Number: 068121

93 Land Company
4430 Hullcar Road, Armstrong, BC V0E 1B4

Dear 93 Land Company

Re: Non-compliance Advisory Letter, Agricultural Waste Control Regulation UA68121, 93 Land Company, 1582 Bradner Road, Abbotsford, Refuse

On October 03, 2017, Ministry of Environment, Environmental Protection Division staff conducted an inspection of your facility, 93 Land Company located at 93 Land Company, 1582 Bradner Road, Abbotsford with authorization number UA68121 under the *Environmental Management Act*.

Failure to comply with the terms and conditions set out in your authorization is an offence under the *Environmental Management Act* (EMA).

A person who fails to comply with a provision of EMA may be found guilty of an offence and could be liable, on summary conviction, to a penalty. For your reference, EMA and all related and pertinent British Columbia Laws can be found at <http://www.bclaws.ca/>.

It should also be noted that, as an alternative to prosecution of the offence mentioned above, the Ministry may initiate action to impose an administrative penalty against 93 Land Company. The *Administrative Penalties Regulation (EMA)* (B.C. Reg. 133/2014) (APR) was brought into force in 2014. The APR describes the prescribed provisions of the *EMA* as well as that of specified regulations under which administrative penalties can be assigned.

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of 93 Land Company, 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, Agricultural Waste Control Regulation (131/92) (EMA) 4: Agricultural waste may be stored on a farm only if the waste is produced or used on that farm.
Details/Findings:	Officer Oldfield contacted Rick Ens who manages the transportation of the agricultural waste for the subject operation. Mr. Ens indicated that manure was brought onsite from other agricultural operations where various waste streams (different manure from differing fowl) are mixed to produce an ideal product for their clients. Once the product is finished, it is removed from site. Mr. Ens indicated that no composting takes place onsite.
Compliance:	Out
Actions to be taken:	93 Land Company must immediately cease the unauthorized introduction of agricultural waste at 1582 Bradner Road in Abbotsford until the waste is dealt with in accordance with the Organic Matter Recycling Regulation or unless the waste is used at 1582 Bradner Road as a soil amendment or as fertilizer. Additional information and forms related to notifications under the Organic Matter Recycling Regulation can be found at http://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-

Ministry of Environment	Compliance Environmental Protection Division	Mailing Address: 2nd Fl 10470-152nd St Surrey BC V3R 0Y3	Telephone: 604 582 5200 Facsimile: 604 930 7119 Website: www.gov.bc.ca/env
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Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 5 (a): When agricultural waste is stored, it must be stored (a) in a storage facility,
Details/Findings:	Agricultural waste is stored on a concrete pad inside one of two structures designed to provide cover to the agricultural waste. A large pile of agricultural waste was observed outside of the overhead cover of the storage facility on October 3, 2017.
Compliance:	Out
Actions to be taken:	None
Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 7 (1): A storage facility must be located at least 15 m from any watercourse and 30 m from any source of water for domestic purposes.
Details/Findings:	No water courses or drinking water sources were observed within 30 m of the waste storage facility.
Compliance:	In
Actions to be taken:	None

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

This is the first electronic compliance record for this authorization.

Please submit all annual/quarterly/monthly reports and data submissions to the Ministry's Routine Environmental Reporting Submission Mailbox at EnvAuthorizationsReporting@gov.bc.ca. More information about the reporting requirements may be found at <http://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/routine-environmental-reporting-submission-mailbox>.

Below are attachments related to this inspection.

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

Yours truly,

Devan Oldfield

Environmental Protection Officer

cc:

Attachments:
1) Photo Record - 1582 Bradner Road.pdf Photo Record

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

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<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%20authorizations>

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: UA68121	Client Name 93 Land Company
NRIS IR #:68121	October 3, 2017

<p>Photo 1</p> <p>Two covered waste storage structures.</p> <p>Photo facing east.</p>	 A black and white photograph showing two large, arched, covered waste storage structures. The structures are situated in an open field with a dirt road or path leading towards them. In the background, there are hills and a clear sky.
<p>Photo 2</p> <p>Loading dock for outgoing product.</p> <p>Photo facing southeast.</p>	 A black and white photograph showing a loading dock area. In the foreground, there is a dirt area with some debris. In the background, there is a long, low building with a loading dock. The photo is taken from a slightly elevated position, looking southeast.



Report Date:February 01, 2018

File:UA-077582

Report Number:077582

REGISTERED MAIL

93 Land Company
4430 Hullcar Road, Armstrong, BC V0E 1B4

Dear 93 Land Company

Re: Warning Letter, 93 Land Company, registration number UA-077582

On November 14, 2017, January 2, 2018 and January 30, 2018, Ministry of Environment and Climate Change Strategy, Environmental Protection Division staff conducted an inspection under *Environmental Management Act (EMA)*, UA-077582. The inspection determined that 93 Land Company is out of compliance with sections identified below for the Agricultural Waste Control Regulation. This Warning Letter lists the compliance verification information contained below.

Failure to comply with the requirements set out in the Agricultural Waste Control Regulation is an offence under the *Environmental Management Act (EMA)*.

If you fail to take the necessary actions to restore compliance, you may be subject to escalating enforcement action. This Warning Letter and the alleged violations and circumstances to which it refers, will form part of the compliance history of the property and will be taken into account in the event of future violations.

Finally, I request that 93 Land Company immediately implement the necessary changes or modifications to address these non-compliances with the Agricultural Waste Control Regulation. Further, I request that 93 Land Company notify this office in writing by email or letter within 30 days of this letter, advising what corrective measures have been taken, and what else is being done, to prevent similar non-compliances in the future.

Inspection Details:

Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 4: Agricultural waste may be stored on a farm only if the waste is produced or used on that farm.
Details/Findings:	On October 17, 2017, Inspection report IR68121 was issued to 93 Land Company. At that time, 93 Land company was found to be out of compliance with section 4 of the Agriculture Waste Control Regulation. On November 14, 2017, January 2, 2018 and January 30, 2018 Officer Oldfield attended the site and observed piles of imported manure in differing configurations indicating that the practice of importing manure to this site had been continuing after the issuance of IR68121.
Compliance:	Out

Ministry of Environment and Climate Change Strategy

Compliance
Environmental
Protection Division

Mailing Address:
2nd Fl
10470-152nd St
Surrey BC V3R 0Y3

Telephone: 604 582 5200
Facsimile: 604 930 7119
Website: www.gov.bc.ca/env

Actions to be taken:	93 Land Company must immediately cease the unauthorized introduction of agricultural waste at 1582 Bradner Road in Abbotsford until the waste is dealt with in accordance with the Organic Matter Recycling Regulation or unless the waste is used at 1582 Bradner Road as a soil amendment or as fertilizer.
Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 5 (a): When agricultural waste is stored, it must be stored (a) in a storage facility,
Details/Findings:	On November 30, 2017 and January 2, 2018, Officer Oldfield attended the site and observed piles of agricultural waste that was placed outside of the storage facilities (see photos below). On January 30, 2018 Officer Oldfield did not observe any agricultural waste outside of the storage facility.
Compliance:	Out
Actions to be taken:	Ensure that agricultural waste is stored in accordance with the Agricultural Waste Control Regulation.
Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 7 (1): A storage facility must be located at least 15 m from any watercourse and 30 m from any source of water for domestic purposes.
Details/Findings:	During the November 14, 2017 inspection, Officer Oldfield observed what appeared to be the early stages of construction of a stormwater management ditch as evidenced by the freshly exposed earth running along the western edge of the westernmost storage building to a freshly dug pit at the northwest corner of the storage facility building (see photos) and on to the ditch along the base of the slope at the northern property boundary where it flows eastwards. During the January 2, 2018 site inspection, Officer Oldfield observed imported rock which had been used to line the previously mentioned ditches and fill the pit. At this time, it has not been determined where this ditch leads to. Pepin Creek is located approximately 220m to the southeast from where the easternmost location of the ditch could be observed.
Compliance:	Not Determined

Actions to be taken:	Ensure that the storage facilities are situated a minimum of 15m from any and all watercourses.
Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 6 (b): A storage facility must (b) prevent the escape of any agricultural waste that causes pollution, and
Details/Findings:	During the November 14, 2017 inspection, Officer Oldfield observed pooled water inside the storage facility and in contact with the agricultural waste. This pooled water was leaving the storage facility and flowing into a recently dug pit at the northwestern corner of the westernmost storage facility building. No sample was obtained at that time so it is not certain whether pollution was occurring.
Compliance:	Not Determined
Actions to be taken:	Ensure that leachate generation is prevented and that any produced leachate is confined to the storage facility and cannot escape to the environment.
Requirement Description:	Environmental Management Act, Agricultural Waste Control Regulation (131/92) (EMA) 11: Agricultural waste must not be directly discharged into a watercourse or groundwater.
Details/Findings:	On November 14, 2017, Officer Oldfield observed pooled water which was in contact with agricultural waste leaving the storage facility and entering an unlined pit. This is a direct path for leachate to enter the local groundwater system.
Compliance:	Out
Actions to be taken:	Prevent any leachate generated at the storage facility from being discharged to watercourse or groundwater.

Compliance History:

2017-10-17 Advisory - failure to adhere to sections 4 and 5 of the Agricultural Waste Control Regulation.

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 warning, please contact the undersigned.

Yours truly,

Devan Oldfield

Environmental Protection Officer

cc:

Attachments:

1) IR77582 - Photo Record.pdf Photolog

Deliver via:

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

**Ministry of Environment
and Climate Change
Strategy**

Compliance
Environmental
Protection Division

Mailing Address:
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Authorization: UA68121	Client Name: 93 Land Company
NRIS IR #: 77582	(Date) Site Inspection Photos: Various

<p>Photo 1</p> <p>Piles of agricultural waste stored outside of the covered storage facility.</p> <p>Photo taken November 14, 2017</p> <p>Photo facing southeast.</p>	
<p>Photo 2</p> <p>Piles of agricultural waste stored outside of the covered storage facility.</p> <p>Photo taken January 2, 2018</p> <p>Photo facing south.</p>	



Authorization: UA68121	Client Name: 93 Land Company
NRIS IR #: 77582	(Date) Site Inspection Photos: Various

<p>Photo 3</p> <p>Fresh cut ditch observed running adjacent to the storage building</p> <p>Photo taken November 14, 2017</p> <p>Photo facing south.</p>	
<p>Photo 4</p> <p>Fresh cut pit along the constructed storm water ditch located at the northwest corner of the westernmost storage building.</p> <p>Photo taken November 14, 2017</p> <p>Photo facing west.</p>	


Authorization: UA68121	Client Name: 93 Land Company
NRIS IR #: 77582	(Date) Site Inspection Photos: Various

<p>Photo 5</p> <p>Pooled water inside the storage facility in direct contact with Agricultural waste and flowing into the freshly cut pit.</p> <p>Photo taken November 14, 2017</p> <p>Photo facing west.</p>	
<p>Photo 6</p> <p>Storm water ditch and pit has now been backfilled with rock.</p> <p>Photo taken January 2, 2018</p> <p>Photo facing south.</p>	

Authorization: UA68121	Client Name: 93 Land Company
NRIS IR #: 77582	(Date) Site Inspection Photos: Various

<p>Photo 7</p> <p>Storm water ditch along bottom of slope of northern property boundary. Water flows east at this point.</p> <p>Photo taken January 2, 2018</p> <p>Photo facing east.</p>	
<p>Photo 8</p> <p>Backfilled pit location with agricultural waste lying on surface.</p> <p>Photo taken January 2, 2018</p> <p>Photo facing southwest.</p>	

Authorization: UA68121	Client Name: 93 Land Company
NRIS IR #: 77582	(Date) Site Inspection Photos: Various

<p>Photo 9</p> <p>Storm water ditch has now been covered with an impermeable base at this location.</p> <p>Photo taken January 30, 2018</p> <p>Photo facing south.</p>	
<p>Photo 10</p> <p>Pooling water within the storage facility in direct contact with agricultural waste.</p> <p>Photo taken November 14, 2017</p> <p>Photo facing south.</p>	