



File: 26250-20/2404
SITE: 2404

November 10, 2016

VIA EMAIL ONLY

Mr. Thomas Land (tland@ecowaste.com)
Ecowaste Industries Ltd.
100 - 3031 Viking Way
Richmond, BC V6V 1W1

Dear Mr. Land:

**Re: Protocol 6 Approval Application for Relief from Delineation
15111 Williams Road, Richmond, BC**

This letter provides my decision on your September 27, 2016 application for approval under Protocol 6 for relief from the requirement to delineate the entire horizontal extent of contamination within the berm surrounding the landfill located at 15111 Williams Road, Richmond, BC (the Site) in order to obtain a Release for issuance of a development permit followed by an Approval in Principle (AiP) and finally a Certificate of Compliance (CoC) due to technical and access feasibility issues.

The Site is further described as follows:

Lot J SEC 27 BLK4N RG5W PL 19680 Except Plan 47993
PID: 003-475-727

Lot C SEC 22 BLK4N RG5W PL 19680 Except Plan 47993
PID: 003-574-083

Lot 1 SEC 15 BLK4N RG5W PL LMP40687
PID: 024-397-407

Lot 2 SEC 15 BLK4N RG5W PL LMP40687
PID: 024-397-423

A site location plan is provided in Attachment A for reference.

In reaching my decision I have relied on information provided in the following document:

- *Pre-Approval Application for Relief from Further Horizontal Delineation at MOE Site 2404, Ecowaste Landfill, 15111 Williams Road, Richmond, BC dated September 27, 2016, prepared by PGL Environmental Consultants.*

The primary rationale and supporting information presented by PGL for relief to delineate the entire horizontal extent of contamination within the berm surrounding the Site for the purpose of obtaining a Release for issuance of a development permit followed by ministry instruments is summarized below:

- *Exceedances of drinking water standards have been identified on Site in the Southern landfill berm which surrounds the landfill.*
- *The berm was constructed in the 1980s using fill material.*
- *On Site contamination is confined to the soil and groundwater within the fill material in the berm above the confining unit, no contamination has been identified in soil or groundwater below the natural landfill liner.*
- *Delineation of contamination is unfeasible for the following reasons:*
 - *delineation towards the landfill will compromise the geo-synthetic liner;*
 - *delineation towards the southern property boundary is unsafe due to the presence of a very steep bank*
 - *like land use to the east and south (presence of a former federal landfill)*
- *Contamination is likely confined to the Site as it is a result of soil deposition*

Based on the information provided in the above document, specifically:

- Contamination has only been identified within the fill material in the berm above a confining unit;
- Hydraulic barriers border the Site;
- Groundwater flow direction is towards the southeast towards a like land use (former federal landfill); and
- There are currently no drinking water wells located within 500 m downgradient of the Site

I confirm my approval of your request under Item 1, Table 2 of Protocol 6 for relief from further off-site delineation of contamination within the berm surrounding the landfill located at 15111 Williams Road, Richmond, BC.

This approval provides support to proceed with applications for a Release and contaminated sites legal instruments under the Protocol 6 review process. It does not constitute review or acceptance by the director of any aspect of the submission requirements for such applications.

Please ensure that a copy of this letter and its attachments are included in any Release application made for the site.

This decision is based on the most recent information provided to the ministry regarding the above-referenced site. The ministry, however, makes no representation or warranty as to the accuracy or completeness of this information. The ministry expressly reserves the right to change or substitute different requirements where circumstances warrant.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alan W. McCammon', with a long horizontal flourish extending to the right.

Alan W. McCammon
for Director, Environmental Management Act

attach. (2)

cc: Simone Mol, PGL Environmental Consultants smol@pggroup.com,
Catherine Schachtel, CSAP Society cschachtel@CSAPsociety.bc.ca
Liliana Jerade, Ministry of Environment Liliana.Jerade@gov.bc.ca
Janet Barrett, Ministry of Environment Janet.Barrett@gov.bc.ca
Lucy Hewlett, Ministry of Environment Lucy.Hewlett@gov.bc.ca

Attachment A Site Location Plan



2015 orthophoto provided by Ecowaste Industries Ltd.



SITE LOCATION			
15111 Williams Rd, Richmond, BC			
ECOWASTE INDUSTRIES LTD.			
	File No:	Dwg No:	FIGURE
	0079-01.17	Site_Loc	
	Date:	Drawn by:	
	SEP 2016	IRB	

Attachment B - Signed Protocol 6 Approval Application