

July 30, 2021

File: 5220-20  
Residuals Treatment Facility Biosolids

The Honourable George Heyman  
Ministry of Environment & Climate Change Strategy  
PO Box 9047 Stn Prov Gov  
Victoria, BC V8W 9E2  
*Via email: [ENV.Minister@gov.bc.ca](mailto:ENV.Minister@gov.bc.ca)*

Dear Minister Heyman:

**RE: SHORT-TERM MANAGEMENT OF CRD BIOSOLIDS**

I am writing on behalf of the Capital Regional District (CRD) Board regarding biosolids management in the capital region.

With the assistance of provincial and federal funding, the CRD recently upgraded its core area waste water service, including the construction of a Residuals Treatment Facility (RTF) to receive residual solids and process them into dried Class A biosolids.

The CRD received approval from your Ministry in October 2019 for our beneficial use strategy (definitive plan) for the first five years of RTF operation, which included transportation of biosolids to the Lafarge cement facility to be used as an alternative fuel. In the plan, the CRD anticipated there would be short periods (equivalent to approximately 10% of annual production) when the cement facility is closed for annual maintenance and unable to receive biosolids. During these periods, the CRD's intention was to dispose of the biosolids in a biocell at Hartland Landfill.

The Ministry's approval of our plan came with a number of conditions. Importantly, these included a prohibition of landfilling biosolids during cement plant shutdowns, and the requirement to submit a contingency plan for beneficial use of biosolids during cement kiln maintenance, inclusive of land application options. In September 2020, the CRD received approval for its short-term contingency plan, which involved using biosolids as a biological growing medium for final cover and engineered biocover for fugitive landfill gas mitigation at our regional Landfill.

The CRD Board has received several pieces of correspondence and delegations from the public expressing their concern regarding the potential for human health and environmental impacts from application of biosolids to the surface of Hartland Landfill. The CRD Board shares these concerns and requests the following:

1. That the decision to prohibit landfilling of biosolids in a biocell at Hartland Landfill be reconsidered; and
2. That the Ministry of Environment and Climate Change Strategy (ENV) proceed with updating the Organic Matter Recycling Regulation (OMRR) as soon as possible, taking into consideration current science, best practices and the state of knowledge on emerging contaminants of concern, in order to address concerns related to public health and environmental values.

Public concern regarding human health and environmental risks posed by land application of biosolids has been clearly expressed as the CRD Board addressed wastewater upgrades over the past few years. Given that the Ministry considers land application in accordance with the OMRR to be a safe practice, we respectfully request that ENV provide updated public information that biosolids land application does not pose a risk to public health or the environment, taking into consideration emerging contaminants of concern and other contaminants that are present in municipal wastewater and biosolids.

Sincerely,



Colin Plant  
Chair, Capital Regional District Board

cc: CRD Board  
Robert Lapham, Chief Administrative Officer, CRD  
Larisa Hutcheson, General Manager, Parks & Environmental Services, CRD  
Glenn Harris, Senior Manager, Environmental Protection, CRD