



Making a difference...together

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December 16, 2022

File: 5200-30
Biosolids

0620-20
Core Area Liquid Waste Management Plan
General

The Honourable George Heyman
Minister of Environment and Climate Change Strategy
PO Box 9047 Stn Prov Govt
Victoria, BC V8W 9E2
Via email: ENV.Minister@gov.bc.ca

Dear Minister Heyman:

RE: SHORT-TERM MANAGEMENT OF CRD BIOSOLIDS

As Chair of the Capital Regional District (CRD) Board, I would like to congratulate you on your reappointment as the Minister of Environment and Climate Change Strategy. We are looking forward to continuing to work with your ministry in the coming years to address the environmental challenges facing our region.

Beneficial use and sustainable management of biosolids generated from the CRD's Residual Treatment Facility remain a priority for the CRD. Ministry staff have been made aware of the challenges faced by the CRD this past year with consistently utilizing the biosolids as an alternative fuel, the primary use outlined in the CRD's [Biosolids Beneficial Use Strategy \(2019 Definitive Plan\)](#). Further to my letters of July 30, 2021 and December 17, 2021 (attached), the CRD Board continues to request that the ministry decision to prohibit landfilling of biosolids in a biocell at Hartland Landfill be reconsidered and that the Organic Matter Recycling Regulation be updated as soon as possible to reflect the 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.

The CRD Board would like the ministry to provide updated public information showing that land application of biosolids does not pose a risk to public health or the environment.



Once again, on behalf of the CRD Board, I would like to extend our congratulations on your reappointment as the Minister of Environment and Climate Change Strategy, and we look forward to hearing from you regarding these important issues.

Sincerely,



Colin Plant
Chair, Capital Regional District Board

Attachments

cc: The Honourable David Eby, Premier of British Columbia
The Honourable Lana Popham, MLA for Saanich South
The Honourable Murray Rankin, MLA for Oak Bay – Gordon Head
The Honourable Mitzi Dean, MLA for Esquimalt – Metchosin
The Honourable Grace Lore, MLA for Victoria – Beacon Hill
The Honourable Rob Fleming, MLA for Victoria – Swan Lake
John Horgan, MLA for Langford – Juan de Fuca
Adam Olsen, MLA for Saanich North and the Islands
CRD Board of Directors
Ted Robbins, Chief Administrative Officer, CRD
Larisa Hutcheson, General Manager, Parks & Environmental Services, CRD



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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

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



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Executive Services
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December 17, 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

Dear Minister Heyman:

RE: FOLLOW-UP LETTER - SHORT-TERM MANAGEMENT TO CRD BIOSOLIDS

Further to my letter of July 30, 2021, I write on behalf of the Capital Regional District (CRD) Board to reiterate the CRD's desire for updates to the Organic Matter Recycling Regulation (OMRR) and reconsideration of options for biosolids at Hartland Landfill.

The CRD Board continues to receive correspondence from the public highlighting concerns regarding potential negative impact to human health and the environment due to land application of biosolids.

The CRD Board would like to reiterate its requests:

1. That the decision to prohibit landfilling of biosolids in a biocell at Hartland Landfill be reconsidered; and
2. 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.

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.

Your response addressing these concerns would be appreciated.

Sincerely,



Colin Plant
Chair, Capital Regional District

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