



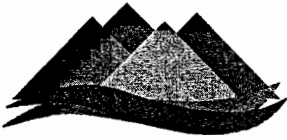
## Forestry Department

The following pages contain correspondence between David G. Coombe, Chief Environmental Health Officer for the Vancouver Island Health Authority, residents of Lantzville, and Paul Lucas, Woodlands Superintendent.

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November 7, 2002	From: David G. Coombe, Chief Environmental Health Officer To: Denis Haime, R.D.N. Director, Area D Linda Westby, Resident, Lantzville
January 14, 2003	From: David G. Coombe, Chief Environmental Health Officer To: Paul Lucas, Woodlands Superintendent
January 29, 2003	From: David G. Coombe, Chief Environmental Health Officer To: Denis Haime, R.D.N. Director, Area D Linda Westby, Resident, Lantzville
March 28, 2003	From: David G. Coombe, Chief Environmental Health Officer To: Denis Haime, R.D.N. Director, Area D Linda Westby, Resident, Lantzville
January 14, 2003	From: David G. Coombe, Chief Environmental Health Officer To: Paul Lucas, Woodlands Superintendent

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**CENTRAL  
VANCOUVER ISLAND  
HEALTH REGION**

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November 7, 2002

Denise Haime  
R.D.N. Director, Area D  
7190 Lantzville Road  
Lantzville BC V0R 2H0

*P.O Box 5*

Linda Westby  
9038 Southwind Drive  
Lantzville BC V0R 2H0

Dear Ms. Haime and Ms. Westby

Re: Malaspina University Biosolids Project

I have contacted the Ministry of Water, land and Air Protection (MLAP) to determine the status of the biosolids project and the relevant legislation that applies to biosolids composting and disposal.


In response, WLAP has provided the following information:

- Malaspina College has provided WLAP with notification of operation under the Organic Matter Recycling Regulation for their composting facility on Weigles Road.
- If they operate in accordance with the Regulation, neither a permit nor approval is required.
- WLAP has no referral process for these notifications other than that laid out in the Regulation. If the facility is within agricultural or forest reserve land, then the Land Reserve Commission gets a copy of the notification. In this instance, no referral to the LRC is required.
- If the application is to agricultural land or in a watershed within which there is a permitted water supply under the Safe Drinking Regulation, then the notification also has to be submitted to the medical health officer having jurisdiction, who has the opportunity to deny the application or require specific conditions on the discharge. The college advises that this site does not meet these criteria. It is the responsibility of the discharger to verify if these criteria apply to their discharge or not.
- The Medical Health Officer will not receive notification, based on the information provided so far by the college.

It is clear the Central Vancouver Island Health Authority will not be given an opportunity to review and comment on the biosolids project.

Since we will not be provided information on the project, I am not able to give you any recommendation regarding impact on the Lantzville Improvement District water supply. I understand that we may get some information directly from the University, but to date, I have not received any reports. I am sorry I cannot offer any further advice as I have no way to assess the impact without the project details.

Yours truly,



David G. Coombe, C.P.H.I.(C)  
Chief Environmental Health Officer

DGC/rt

cc: Dr. Fred Rockwell, MHO

*J. Welsh*





January 14, 2003

File: Malaspina Univ./Coll.

Malaspina University-College  
Faculty of Science & Technology  
900 Fifth Street  
Nanaimo BC V9R 5S5

**Attention: Paul Lucas, R.P.F.  
Woodlands Superintendent**

Dear Mr. Lucas:

**Re: Land Application of Composted Biosolids to the Malaspina Forest Lands**

Dr. Rockwell has forwarded your letter of October 29, 2002 to me for response.

After our careful review of the submitted proposal documentation and a tour of the composting and land application sites on January 9, 2003, VIHA has no objection to your proposal.

Thank you for giving us the opportunity to review your project.

If you have any questions or comments please contact me at (250) 755-6215.

Yours truly,

David G. Coombe  
Chief Environmental Health Officer  
Vancouver Island Health Authority

cc: Dr. F. S. Rockwell, MD, FRCPC, Medical Health Officer, Vancouver Island Health Authority, Nanaimo  
Murray Sexton, P. Eng., Public Health Engineer, Vancouver Island Health Authority, Nanaimo  
Blake Medlar, Manager, Pollution Prevention, Ministry of Water, Land and Air Protection, Nanaimo  
Regional District of Nanaimo





January 29, 2003

File: Malaspina Univ./Coll.

Denise Haime  
Box 5  
Lantzville, B. C.  
V0R 2H0

Linda Westby  
9038 Southwind Drive  
Lantzville, B. C.  
V0R 2H0

Dear Ms. Haime and Ms. Westby:

**Re: Malaspina University-College Biosolids Project**

Further to our meeting of January 22, 2003, the following is provided.

As mentioned during our meeting, permission to use biosolids falls under the jurisdiction of Ministry of Water, Land and Air Protection (WLAP) under their *Organic Matter Recycling Regulation (OMRR)*. It would be WLAP that would determine whether or not this proposal would be allowed and whether or not this proposal meets all the requirements and definitions of their regulation.

During our meeting, Ms. Westby tried to recall which regulation required the Medical Health Officer to be notified if biosolids was being used in *any* watershed. Staff from this office contacted Duncan McLaren, Pollution Prevention Officer with WLAP in Nanaimo. Mr. McLaren advised that the only regulation that covered biosolids was the *OMRR*. Section 22(b) of the *OMRR* does state that the discharger must give notice to the medical health officer "before the land application of managed organic matter to agricultural land or in a watershed", but Section 21 of the *OMRR* does define watershed as a watershed used as a permitted water supply under the Safe Drinking Water Regulation, B. C. Reg. 230/92.

Staff from this office contacted Gilles Wendling, Ph.D., P. Eng., Senior Hydrogeologists with EBA Engineering Consultants Ltd., for his opinion on the biosolids project, Mr. Wendling advised that it is likely that any leaching from the biosolids or movement of biosolids would be intercepted by surface streams and the risk to the wellfield is minimal, if not non-existent.

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After discussions with Dennis Trudeau, Manager, Liquid Waste Management Program, Regional District of Nanaimo (RDN), we understand that Alan Dakin, P. Eng., P. Geo., of Piteau Associates is going to review this proposal. Mr. Dakin is one of the most respected groundwater experts in the province and we await his opinion on this project.

During our meeting, you mentioned the EBA Engineering Consultants Ltd., report entitled "Harby Road Well Field Management" dated February 11, 2002, prepared for the Lantzville Improvement District. Unfortunately, we do not have a copy of this report, but it is important for Mr. Dakin to be aware of this report for his review. Also, we would be interested in receiving a copy of this report, or any other groundwater reports for the area, as the Harby Road wellfield is the source of water for Lantzville Improvement District.

In light of any new information from Mr. Dakin or from the EBA report, we will review our previous conclusions, but until such time, our position, as outlined in my January 14, 2003 letter to Paul Lucas of the Malaspina University-College, is unchanged.

Yours truly,



David G. Coombe, C.P.H.I.(C)  
Chief Environmental Health Officer

cc: Dr. Fred Rockwell, Medical Health Officer, Vancouver Island Health Authority, Nanaimo  
Murray Sexton, P. Eng., Public Health Engineer, Vancouver Island Health Authority, Nanaimo  
Paul Lucas, PRF, Woodlands Superintendent, Malaspina University College  
Dennis Trudeau, Manager, Liquid Waste Program, Regional District of Nanaimo  
Duncan McLaren, Pollution Prevention Office, Ministry of Water, Land and Air Protection, Nanaimo  
Gilles Wendling, Ph.D., P. Eng., Senior Hydrogeologist, EBA Engineering Consultants Ltd., Nanaimo



VANCOUVER ISLAND  
**health**  
**authority**

March 28, 2003

File: Malaspina Univ./Coll.

Denise Haime  
Box 5  
Lantzville, B. C.  
V0R 2H0

Linda Westby  
9038 Southwind Drive  
Lantzville, B. C.  
V0R 2H0

Dear Ms. Haime and Ms. Westby:

**Re: Malaspina University-College Biosolids Project**

Further to my previous letter of January 29, 2003, the following is provided.

As promised in my previous letter, we have reviewed the hydrogeological assessment of Alan Dakin, P. Eng., of Piteau Associates Engineering Ltd., dated March 12, 2003. Mr. Dakin concludes that there will be no impact on groundwater quality in any wells in the region.

As stated in my January 14, 2003 letter to Paul Lucas of the Malaspina University-College, the Vancouver Island Health Authority has no objection to the land application of biosolids as proposed by the Malaspina University-College.

Yours truly,

David G. Coombe, C.P.H.I.(C)  
Chief Environmental Health Officer

cc: Dr. Fred Rockwell, Medical Health Officer, Vancouver Island Health Authority, Nanaimo  
Murray Sexton, P. Eng., Public Health Engineer, Vancouver Island Health Authority, Nanaimo  
Paul Lucas, PRF, Woodlands Superintendent, Malaspina University College  
Dennis Trudeau, Manager, Liquid Waste Program, Regional District of Nanaimo  
Duncan McLaren, Pollution Prevention Office, Ministry of Water, Land and Air Protection, Nanaimo

Health Protection  
1665 Grant Avenue  
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**CENTRAL  
VANCOUVER ISLAND  
HEALTH REGION**

**ENVIRONMENTAL HEALTH PROGRAM**

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January 14, 2003

File: Malaspina Univ./Coll.

Malaspina University-College  
Faculty of Science & Technology  
900 Fifth Street  
Nanaimo BC V9R 5S5

**Attention: Paul Lucas, R.P.F.  
Woodlands Superintendent**

Dear Mr. Lucas:

**Re: Land Application of Composted Biosolids to the Malaspina Forest Lands**

Dr. Rockwell has forwarded your letter of October 29, 2002 to me for response.

After our careful review of the submitted proposal documentation and a tour of the composting and land application sites on January 9, 2003, VIHA has no objection to your proposal.

Thank you for giving us the opportunity to review your project.

If you have any questions or comments please contact me at (250) 755-6215.

Yours truly,

David G. Coombe  
Chief Environmental Health Officer  
Vancouver Island Health Authority

cc: Dr. F. S. Rockwell, MD, FRCPC, Medical Health Officer, Vancouver Island Health Authority, Nanaimo  
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