



April 3, 2019

**Environmental Assessment Office**

PO Box 946 Stn Prov Govt  
Victoria, BC V8W 9V1

**Attention: Nathan Braun, Executive Project Director, Oil & Gas Sector  
Meaghan Hoyle, Project Assessment Manager**

**RE: Administrative Amendment to Woodfibre LNG Limited's Environmental Assessment Certificate (#E15-02)**

Dear Mr. Braun,

In accordance with Section 19(1) of the *BC Environmental Assessment Act* (BCEAA), we are requesting an amendment to Environmental Assessment Certificate (EAC) #E15-02 to clarify the definition of Construction in Schedule B such that site management and remediation activities unrelated to the Woodfibre LNG Project (Project) can continue in a safe and responsible manner. This is a Simple Amendment as per the Environmental Assessment Office's guidance for amendments<sup>1</sup> in that it "clarifies ambiguous wording in Schedule A or B". The background for the request and the clarifications sought are provided below.

**1.1 Current Site Operations and Management Obligations**

Woodfibre LNG Limited (Woodfibre LNG) is the owner of the fee simple property at the Woodfibre site, about seven kilometres southwest of Squamish, BC as well as the associated infrastructure remaining from the historic Woodfibre pulp mill that operated from the early 1900s to 2006. As owner of the Woodfibre property and water lot lease, we are obligated to undertake site management activities in a safe and environmentally sound manner in accordance with provincial legislation, regardless of the future use of the site approved under EAC #E15-02. Examples of facilities that are operating at the Woodfibre property and must be managed in accordance with existing permits are a small craft dock, small hydroelectric plant, wastewater treatment plant, and landfill. Woodfibre LNG also continues to manage both the fee simple property and the water lots in accordance with the requirements of the Certificates of Compliance issued under the *Environmental Management Act*. All current and planned activities on the site are in alignment with the existing site zoning and District of Squamish bylaws as well as past and ongoing regulatory requirements pursuant to the *Land Act* (Lease No. 233113), *Environmental Management Act* (permits 7322, 2334 and PE-02334), and *Water Sustainability Act* (water licences F007219, F017347, F044330, F004897, F126502, F126616, F126617 and F126618 as well as associated permits over Crown land).

Since acquiring the property in 2015, Woodfibre LNG has been working to remove the remnants of the previous pulp mill beginning with infrastructure that poses a safety or environmental hazard, particularly structures that contain asbestos, lead paint, or other hazardous materials. The

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<sup>1</sup> EAO. 2016. Seeking an Amendment to an Environmental Assessment Certificate Guidance to Certificate Holders.

remnants of the previous pulp mill occupied the site prior to Woodfibre LNG's ownership and are not connected to the Project.

In order to continue the remediation work at the Woodfibre property in accordance with Squamish Nation's direction, Woodfibre LNG is planning to undertake the following tasks in the short term:

- Remove and crush concrete slabs and recycle the rebar.
- Demolish and dispose of the decrepit first aid building.
- Remove a pedestrian bridge.
- Stockpile crushed concrete for use as landfill capping and other site remediation activities.
- Sludge removal at bio-basin (a land-based concrete tank used in the pulp mill process).
- Cap the landfill.

Remediation and removal of additional legacy infrastructure will be ongoing. There will not be any remediation or removal work below the high-tide mark or within Mill or Woodfibre creeks. The pedestrian bridge over Mill Creek will be disconnected from its abutments and removed using a land-based crane.

There was damage sustained to the small craft dock and helipad at the Woodfibre property during the large wind storms in December 2018. These areas will require repairs in order to continue to provide safe access and egress from the Woodfibre property. It is our understanding that these repairs would be considered maintenance under the definition of Construction in the Project EAC, and they are therefore not included in the scope of this administrative amendment.

In addition, Woodfibre LNG will continue to clean-up trash and other materials left at the Woodfibre property as a result of previous site activities, including cleaning up and disposing of the tire dump, removing small storage sheds, replacing propane tanks used to operate the administration building, and removing chemicals and liquids from the site.

## **2.0 Rationale for Requested Changes**

### ***Definition of Construction***

Woodfibre LNG received EAC #E15-02 for the Project on October 26, 2015. At Squamish Nation's direction, Woodfibre LNG obtained Amendment 001-2017 to EAC #E15-02 to switch the facility from seawater cooling to air cooling on July 12, 2017.

Woodfibre LNG has communicated our commitment to continued remediation of the existing site beginning in our Application for an EAC submitted in 2015. Section 2.2.7.1.1 of the Application for an EAC (the Project Description) states:

"Woodfibre LNG Limited expects to take ownership of the Project site early in 2015. Upon taking ownership of the site, WLNG will continue with the remediation work that was started by the former owner of the Woodfibre site to the extent that is legally allowable prior to the receipt of an EAC. This remediation work may include the removal of creosote piles and other existing works on site. Woodfibre LNG Limited will ensure this work is done consistently with the mitigation measures in the Application for an EAC.

Structures and buildings remaining at the site, such as the bridges across Mill Creek, will be demolished if not to be reused as part of the Project. Similarly, paved surfaces may be removed where they are not required for final configuration. Serviceable demolition rubble may be retained

at the site for use as compacted construction fill; other construction materials will be reused where feasible. Materials that aren't suitable for reuse at the site will be deposited in the onsite landfill or placed into containers and transported off site for disposal at a permitted facility."

Woodfibre LNG has reviewed the mitigation measures from the Application for an EAC and the conditions from EAC #E15-02. There are not any references to the removal of existing infrastructure from the former pulp mill. Although several conditions could be seen as generally applicable (e.g., erosion control measures), these mitigation measures are consistent with environmental best management practices and legislative compliance and would be implemented regardless of the applicability of EAC #E15-02.

Woodfibre LNG considers that continuing the ongoing remediation of the Woodfibre property and removal of existing infrastructure is required regardless of the future use of the Woodfibre property and whether the Project proceeds. We also believe that this ongoing remediation is environmentally beneficial as well as required for the health and safety of our employees. Accordingly, we believe that it is consistent with the intent of the Application for an EAC, and we are requesting that the definition of construction be updated to allow this important work to continue. Further, clarifying that the ongoing remediation and removal work is not part of the Project does not have the potential to result in significant adverse effects because the change is consistent with Application for an EAC and does not change the Project-related effects.

### ***Closure of Landfill***

The existing pulp mill landfill is included in the list of infrastructure in Schedule A as Woodfibre LNG had previously planned to use this landfill for construction waste before closing it. Since the Application for an EAC was submitted, we have undertaken additional studies and have determined the best course of action is to close the landfill, including from an environmental perspective. Woodfibre LNG is currently working with the Ministry of Environment and Climate Change Strategy on the closure of the landfill, which is currently scheduled for this summer (subject to approval of the closure plan). Closure of the landfill will be in accordance with the *Environmental Management Act* and applicable permits.

Leachate from the landfill is currently being treated prior to discharge into Howe Sound to meet the requirements of the *Environmental Management Act* permit. The capacity of the treatment facility, which was installed in 2008, is not sufficient for an open landfill without the storage capacity of the biobasin. Woodfibre LNG installed a backup treatment facility in 2017 for periods of high runoff. Closing the landfill will decrease the amount of leachate produced over time, and the required treatment capacity will be reduced. The reduction in leachate produced also reduces the potential for an accidental release of leachate to the environment. Fugitive emissions associated with two historic capped landfills were considered in the Application for an EAC (Appendix 5-3.1), and these emissions are unaffected by the planned remediation activities or whether the Project proceeds. Closing the remaining landfill is not expected to materially affect the greenhouse gas emissions produced by the landfill.

The Application for an EAC states that waste will be disposed of at the on-site landfill or another permitted landfill (e.g., Section 2.2.7.1.1). Accordingly, waste disposal off-site is consistent with the Application for an EAC. Closing the landfill in advance of Project construction will mean that more waste will be transported away from the Certified Project Area than if the landfill remained open. It is expected that this waste would be transported on barges that would leaving the property regardless, and marine traffic will not be affected. Regardless of the landfill closure, Woodfibre LNG

will develop and implement a waste management plan as part of the Construction Environmental Management Plan for the Project that includes the information specified in Section 13.2.2.16 of the Application for an EAC. This plan will help ensure hazardous and non-hazardous waste to ensure that waste generation is reduced and that waste is properly stored and disposed of.

Section 2.2.6.3.15 of the Application for an EAC states that depending on the results of ongoing studies, seismic upgrades to the existing permitted landfill may be undertaken to meet regulatory seismic requirements. Stantec Consulting Ltd. undertook an assessment of the slope stability of the existing landfill berm based on the landfill closure plan in August 2018. This study did not identify slope stability concerns under either static loading conditions or the design seismic conditions (1 in 2,475 peak ground acceleration). Following closure of the landfill, semi-annual monitoring of the leachate levels within the landfill will continue until trends indicate stabilization of levels that would support reduced levels of monitoring (consistent with Mitigation M5.6-4). Regardless of when the landfill is closed, its closure will be overseen by a qualified professional who will be responsible for ensuring that it meets the BC Ministry of Environment and Climate Change Strategy's guidance on closure and post-closure criteria in Landfill Criteria for Municipal Solid Waste (June 2016).

### **3.0 Aboriginal Consideration**

Squamish Nation has consistently provided direction to Woodfibre LNG, both verbally and in a letter dated October 1, 2018 (Attachment I) that the Woodfibre site be remediated, including decommissioning of past development infrastructure, prior to construction of the Project. As noted in the letter, Squamish Nation view remediation as a separate commitment required regardless of whether the Project proceeds.

In line with this direction, Squamish Nation has provided the attached letter of support for the proposed changes to the EAC to allow for the continued remediation of the Woodfibre site prior to construction (Attachment II).

Woodfibre LNG has reached out to Tsleil-Waututh Nation and is confirming whether they have any concerns with the proposed changes to the EAC. Woodfibre LNG will provide any feedback received from Tsleil-Waututh Nation in regards to this change as soon as possible.

### **4.0 Proposed Clarifications to Schedule B of the EAC**

In order to allow the important remediation work to continue at the Woodfibre property in accordance with Squamish Nation's direction and the intent of the EAC, Woodfibre LNG is requesting clarifications to Schedule A and B of EAC #E15-02.

Because the landfill will not be used to support Project construction, we are requesting that it be removed from the list of supporting permanent infrastructure in Schedule A.

The current definition of construction in the EAC has led to ambiguity as to what activities are to be included, and have limited Woodfibre LNG's ability to continue to remove the remnants of the previous pulp mill, and in particular, infrastructure that poses a safety or environmental hazard. For clarity, we are proposing the following amendment to the definition of Construction in Schedule B:

“Construction - The phase of the Project during which physical activities in connection with site preparation, building or installation of any component of the Project occurs. For purposes of this Schedule B, Construction does not include the following: (i) any activities conducted solely for investigative purposes, (ii) the demolition and removal or onsite remediation of exiting structures and facilities associated with the former Woodfibre Pulp Mill, (iii) the closure of the existing pulp mill landfill, and (iv) ongoing maintenance or upgrades to the existing facilities to address safety, environment or regulatory compliance.”

#### **4.0 Closing**

The Simple Amendment request herein is consistent with the expectations of such a request. There is no physical change to the Project, it clarifies ambiguous wording in the Schedule B, and as per the consultation conducted with Squamish Nation on this change there is low potential to impact Aboriginal rights. The amendment sought will allow for site management activities that are unrelated to the Project to continue in a safe and responsible manner.

If you have any questions, please contact the undersigned at 604.620.7883 or [david.keane@wlng.ca](mailto:david.keane@wlng.ca).

Sincerely,

**Woodfibre LNG Limited**



David Keane  
President

**Cc:**

Chief Bill Williams, Squamish Nation (via Aaron Bruce)  
Michel Vitou, Chief of Compliance and Enforcement, Canadian Environmental Assessment Agency  
Katherine Hess, Senior Compliance Promotion and Enforcement Analyst, Canadian Environmental Assessment Agency  
Chris Parks, Director Compliance and Enforcement, Environmental Assessment Office



**Woodfibre  
LNG**

**Attachment I**

**Letter from Squamish Nation in regards to continued site remediation**



October 1, 2018

Byng Giraud,  
Vice President, Corporate Affairs  
Woodfibre LNG  
#1020-1075 W. Georgia St.  
Vancouver, BC  
V6E 3C9

Dear Mr. Giraud:

**RE: Decommissioning of past development infrastructure on Woodfibre site  
("Site")**

As we discussed prior to issuing Woodfibre LNG an EA Certificate, we required that the Woodfibre site be remediated to a standard that permits industrial use of the Site as well as a full decommissioning of past development infrastructure prior to construction of the LNG project. We understand that the Site has been remediated to this standard, but full decommissioning has not occurred yet.

We do not consider this activity construction under our EA Certificate, and as such have consented to a Squamish Nation company, Sukwi7, to carry out this work. We expect this work to be completed prior to construction and expect that the decommissioning continue to retain Squamish Nation environmental monitors as well as meet any expectations set out in the Squamish Nation Environmental Assessment or by the Squamish Nation technical working group.

Chen kwen mantumi  
(I thank you),

Chief Bill Williams  
talalsám̓kin siyám  
Lead Negotiator Aboriginal Rights & Title Sk̓wx̓wú7mesh  
Intergovernmental Relations, Natural Resources, & Revenue  
Squamish Nation





**Attachment II**

**Letter from Squamish Nation in Support of Amendment**





March 29, 2019

Byng Giraud,  
Vice President, Corporate Affairs  
Woodfibre LNG  
#1020-1075 W. Georgia St.  
Vancouver, BC  
V6E 3C9

Dear Mr. Giraud:

**RE: Decommissioning of past development infrastructure on Woodfibre Project site**

We understand that Woodfibre LNG is requesting an amendment to its Environmental Assessment Certificate to clarify the definition of Construction in Schedule B such that site management and remediation activities unrelated to the Woodfibre LNG Project can continue in a safe and responsible manner.

Further to our previous letter dated October 1, 2018 indicating that we do not consider ongoing clean-up of the Woodfibre site to constitute construction of the Project, we also support the proposed change to the EAC's definition of Construction in order to allow cleanup on site to continue.

Chen kwen mantumi  
(I thank you),

Chief Bill Williams  
talalsámkin siyám  
Lead Negotiator Aboriginal Rights & Title Skwxwú7mesh  
Intergovernmental Relations, Natural Resources, & Revenue  
Squamish Nation

