

Project Name	LNG Canada Export Terminal Project (LNGC)	Inspection Status	Final
EA Certificate #	E15-01	Inspection No.	20230012_IR001
Project Status	Certified	Inspection Start	2023-03-21
Sector	Energy	UTM	9U 520432 E 5986829 N
Trigger	Planned Inspection	Inspection Type	Field and Administrative
Project Description	The LNG Canada Export Terminal Project (Project) consists of the construction and operation of a liquefied natural gas (LNG) plant and associated marine terminal facilities.		
Location Description	The Project is located in the District of Kitimat.		
Inspection Summary	On March 21, 2023, Environmental Assessment Office (EAO) Compliance and Enforcement Officer Shayla Frechette inspected the LNG Canada Export Terminal Project (Project) against the requirements of the Environmental Assessment Certificate (EAC) E15-01, Schedule B (Appendix 1).		
	The Project was in Construction at the time of inspection.		
	Officer Frechette inspected the Cedar Valley Lodge, laydowns, stockpile, water storage ponds and discharge locations. The inspection included a debrief of observations with Project staff on March 21, 2023.		
	The following requirements were inspected against:		
	<ol> <li>Condition 12 with respect to bat monitoring program.</li> <li>Condition 14 with respect to on-site recreation facilities.</li> <li>Condition 14 with respect to on-site health services and medical emergency response regarding primary.</li> <li>Condition 14 with respect to on-site health services and medical emergency response regarding transportation.</li> <li>Condition 20 and Enforcement Order EN2020-010 with respect to spill and emergency prevention.</li> <li>Condition 20 with respect to inspection and maintain of waste storage facilities.</li> <li>Condition 20 with respect to disposal of waste streams.</li> <li>Condition 20 with respect to snow dump location wastewater discharge.</li> <li>On April 21, 2023, Officer Frechette provided the preliminary inspection record to the Certificate Holder.</li> <li>On April 28, 2023, the Certificate Holder provided comments pertaining to the preliminary inspection record. These comments were reviewed and edits were made to the record by the EAO Compliance and Enforcement Branch (CEB) to correct identified errors of fact or omission prior to finalizing.</li> </ol>		
	Additional detail regarding these fir	ndings may be found in	the sections below.
	The compliance determinations in t noted above. These determinations through future inspections or if nev	can change at any tim	e upon information gathered



In Attendance	Compliance Lead, LNG Canada Environmental Compliance Advisor, LNG Canada Environmental Lead, LNG Canada Permitting & Compliance Specialist, JFJV Deputy Site Environmental Manager, JFJV HSE Emergency Response Advisor, JFJV Lodging and Transportation Manager, JFJV Site Services Roads and Grounds Lead JFJV	
Certificate Holder	LNG Canada Development Inc	
Mailing Address	PO Box 100, Station M	
	Calgary, AB T2P 2H5	

## **INSPECTION DETAILS**

## **Requirement 1:** Condition 12 of the EAC, Schedule B requires a Wildlife Management Plan (Appendix 1) Wildlife Management Plan (Appendix 2) Section 8.1 Monitoring **Bat Monitoring Program** Following vegetation clearing on site and after the installation of bat boxes an annual bat box monitoring program will be implemented.

#### Findings:

On March 22, 2023, Officer Frechette requested photographic evidence of bat boxes and a copy of the annual bat box monitoring report for 2022.

On March 30, 2023, an LNGC representative provided the Bat Box Effectiveness Monitoring Program – Monitoring Report for 2022 (Appendix 3). The report noted a total of 10 bat boxes, four of which had evidence of occupancy. The report provided a map and photographs of the installed bat boxes in their respective locations.

The information provided during the inspection provides evidence of compliance with respect to evidence of bat boxes and annual bat box monitoring program.

## Compliance Determination: In

**Requirement 2:** Condition 14 of the EAC, Schedule B requires a Community Level Infrastructure and Services Management Plan (Appendix 1) Community Level Infrastructure and Services Management Plan (Appendix 4) **Social Management Plans Community Amenities Social Management Plan On-Site Recreation Facilities** Include recreational facilities in the Workforce Accommodation Centre(s) to reduce project-related demands on community level infrastructure and services. Findings:



On March 21, 2023, Officer Frechette and Ellis inspected the workforce accommodation center, also known as Cedar Valley Lodge (CVL), for recreational facilities. Officers observed a gymnasium, walking track, four squash courts, two rock climbing walls, two weightlifting gyms, a yoga studio, golf simulator and games rooms. In addition, Officers noted posters advertising classes, activities and movies on hallway walls. LNGC Project representatives explained how CVL has an app, which all guests have access to and includes the facility services.

The observations noted at the time of the inspection provide evidence of compliance with respect to recreational facilities in the workforce accommodation center.



Photo 1: Ladies only fitness room



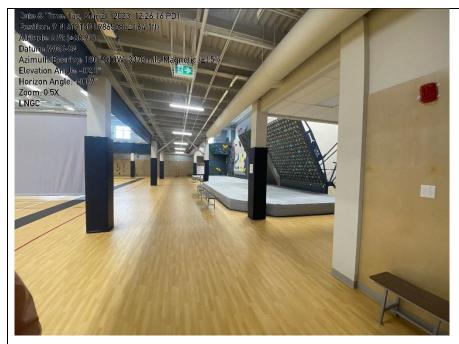


Photo 2: Gymnasium and rock-climbing wall.



Photo 3: Golf simulator room.

Compliance Determination: In

### **Requirement 3:**

**Condition 14 of the EAC, Schedule B requires a Community Level Infrastructure and Services Management Plan** (Appendix 1)



## Community Level Infrastructure and Services Management Plan (Appendix 4)

**Social Management Plans** 

**Community Health Social Management Plan** 

## **On-site Health Services and Medical Emergency Response**

Provide on-site health services, with access to primary care including health promotion and medical emergency response, in order to minimize impact on the local public health care system

## Findings:

During the inspection Officers inspected the workforce accommodation centre for on-site health services. Officers noted four primary care rooms as well as one trauma centre room. Officers spoke with the onsite nurse practitioner who explained that the clinic can be accessed via drop in or by appointment, which reduces the level of impact to the public health care. For more serious injuries or illnesses, patients are transported to Kitimat or Terrace for treatment. LNGC Project representatives also noted that during the Covid 19 vaccination roll out that the clinic offered vaccines, which also reduced the level of risk and impact of the community.

Additionally, Officers noted informational posters throughout the hallways regarding health promotions, such as mental health counselling, alcoholic anonymous meetings and first aid courses.

The observations noted during the inspection provide evidence of compliance with respect to on-site health services.



Photo 4: One of four medical examination rooms located in medical facility.



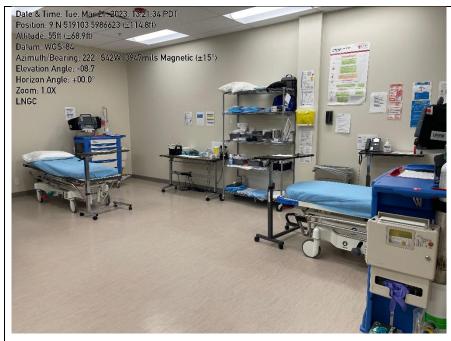


Photo 5: Trauma Room location in medical facility.

Compliance Determination: In

#### **Requirement 4:**

**Condition 14 of the EAC, Schedule B requires a Community Level Infrastructure and Services Management Plan** (Appendix 1)

Community Level Infrastructure and Services Management Plan (Appendix 4)

#### **Social Management Plans**

#### **Community Health Social Management Plan**

#### **On-site Health Services and Medical Emergency Response**

In the event of major injuries/illnesses, coordinate with appropriate organizations to transport patients to appropriate medical facilities. In addition, on-site emergency transportation vehicle will be used to offset potential demand increase on the BC Ambulance Service.

#### Findings:

On March 21, 2023, while speaking to the nurse practitioner it was noted that the Project has one ambulance, two mobile treatment centres, two paramedics and one fire captain on site at all times. LNGC Project representatives explained that the mobile treatment centres are used at site-specific locations during construction and the ambulance and fire truck are used in emergencies. The nurse practitioner noted that most injuries and illnesses are managed onsite, but when patients require advance care they are transported via company vehicle or by the BC Ambulance service. Officer Frechette confirmed an ambulance and firetruck to be onsite between the office trailers and CVL.

The information provided and observations noted at the time of the inspection provide evidence of compliance with respect to on-site emergency transportation vehicles.





Photo 6: Medical ambulance and fire truck located in building between office trailers and Cedar Valley Lodge.

### Compliance Determination: In

#### **Requirement 5:**

**Condition 20 of the EAC, Schedule B requires a Construction Environmental Management Plan** (Appendix 1) **Construction Environmental Management Plan** (Appendix 5)

#### Spill Prevention, Response, Reporting and Emergency Response Planning

Section 5.1: Spill and Emergency Prevention

Employ and/or manage secondary containments in a manner which does not lead to the collection of rainwater and/or snow; properly dispose of any accumulated water and snow.

## Enforcement Order EN2020-10 (Appendix 6)

Maintain secondary containments and drip trays in a manner which does not lead to the collection of rainwater and/or snow in the secondary containment feature or drip tray.

#### Findings:

During the inspection Officers inspected laydowns for secondary containment and drip trays. Officers noted all secondary containment trays to be free of rainwater and accumulation of snow. Additionally, long term storage of equipment and hazardous liquids was managed by storing items in secondary containment under covered areas.

The observations noted at the time of the inspection provide evidence of compliance with respect to maintenance of secondary containment and drip trays.





Photo 7: Equipment in secondary containment stored under cover.

#### Compliance Determination: In

#### **Requirement 6:**

Condition 20 EAC, Schedule B requires a Construction Environmental Management Plan (Appendix 1) Construction Environmental Management Plan (Appendix 5) Section 9: Waste Management, Monitoring and Reporting Requirements Inspect and maintain waste storage facilities regularly.

#### Findings:

On March 22, 2023, Officer Frechette requested records of inspections of waste storage facilities for CVL for January and February 2023.

On March 30, 2023, LNGC representatives provided Officer Frechette documentation for January and February called "External Walks" and "External Safety Walks" (Appendix 7-10). The documentation provided noted inspections for labeling of bins but did not provide evidence of specific inspections and maintenance for waste storage facilities for accurate content.

During the field inspection on March 21, 2023, Officer Frechette noted labelled garbage bins with clear plastic bags containing a variety of waste. Within the clear plastic bags Officer Frechette noted, drink recyclables, paper, carboard, and hard plastics. The field observations provide evidence that inspections and maintenance have not been conducted at waste storage facilities.

The information provided at the time of the inspection provides evidence of non-compliance with respect to regular waste storage facility inspections.

Compliance Determination: Out - Notice of Non-Compliance



## **Requirement 7:**

**Condition 20 of EAC, Schedule B requires a Construction Environmental Management Plan** (Appendix 1) **Construction Environmental Management Plan** (Appendix 5) **Section 9: Waste Management, Monitoring and Reporting Requirements** 

• Do not mix different kinds of wastes in the same container if such mixing involves incompatible materials or makes it more difficult to treat / recycle / dispose the waste.

### Findings:

During the inspection, Officer Frechette and Ellis inspected the workforce accommodation for segregation of waste streams. Officer Frechette observed a variety of mixed waste, including recyclable materials in incorrectly labelled bins throughout the hallways, dining areas and common areas. Furthermore, Officers inspected waste storage areas outside the kitchen and outside housekeeping, which included compactors bins, recycling bins and compost bins. Officers noted recyclable materials, such as paper, cardboard, plastics and beverage containers in the general waste compactor bins and a mix of hard plastics and metals in one bin. Project representatives explained that waste bins are removed directly off site and are further sorted at landfill locations.

The observations at the time of the inspection provide evidence of non-compliance with respect to on site waste management.



Photo 8: Marked drink container recycling with bottles, cans, plastic and paper.





Photo 9: General waste compactor containing paper and cardboard.



Photo 10: General waste compactor containing hard plastics, paper and drink containers.

Compliance Determination: Out - Notice of Non-Compliance

### **Requirement 8:**

**Condition 20 of the EAC, Schedule B requires a Construction Environmental Management Plan** (Appendix 1) **Construction Environmental Management Plan** (Appendix 5)

## Section 9 Monthly Waste Reporting

While keeping a rolling log, subcontractors shall submit to JFJV on site Environment Team Representative, a waste report including the following:

• Description of waste including the quantity / volume and type of generated waste, stored quantities and types and disposal quantities and locations

• Copy of waste manifest as per project permits / approvals and conditions and disposal facilities

• Number of complaints, rejected loads by disposal facilities

### Findings:

On March 22, 2023, Officer Frechette requested monthly waste reporting documentation as noted above for January and February 2023.

On March 30, 2023, LNGC stated "JFJV manages a waste tracking log that contains the information provided by subcontractors; including the waste type, container type, waste quantity and manifest/bill of lading. For Cedar Valley Lodge, waste is managed through Secure (through Sodexo)."

LNGC provided a Waste Bill of Lading for cardboard, organics, plastics, general waste and sludge for both January and February 2023 (Appendix 11 & 12).

LNGC also provided a rolling waste log, which detailed date, type of waste, container type, quantity and location of where waste was removed from (Appendix 13).

No documentation was provided regarding number of complaints or rejected loads by disposal facilities.

On April 28, 2023, LNGC responded to the preliminary record and noted, "LNGC would like to acknowledge that JFJV did inform us that no complaints or concerns were received. It was an oversight our part to not include this information in the original response to the information request."

The information provided notes evidence of compliance with respect to monthly waste reporting.

Compliance Determination: In

## **Requirement 9:**

**Condition 20 of the EAC, Schedule B requires a Construction Environmental Management Plan** (Appendix 1) **Construction Environmental Management Plan** (Appendix 5)

Section 10: Surface Water Management, Monitoring and Reporting Requirements

Ensure that snow dumps are located appropriately and that runoff is managed to control the discharge of the snow melt to a non-environmentally sensitive area.

## Findings:

On March 22, 2023, Officer Frechette and Ellis observed two snow dump locations for the Project site. One snow dump was located at the east side of the stockpile and contained a perimeter ditch. LNGC Project representatives explained that during warmer temperatures crews will use equipment and water to melt the snow. The wastewater is pumped via hoses to the main storage water ponds and is treated prior to discharge. Officer Frechette noted an inactive pump and hose located in the perimeter ditch next to the snow pile.

The observations noted at the time of inspection provide evidence of compliance with respect to snow dump location and management.





Photo 11: Snow pile located beside stockpile with perimeter ditch.



Photo 12: Snow pile located near the facility area.

Compliance Determination: In

**Actions Required by Certificate Holder & Additional Comments** 



None at this time.				
Enforcement Summary				
None at this time				
Regulatory Considerations				
None at this time.				
Inspection Conducted by				
	Date Preliminary Record Sent to Certificate Holder			
Shaylefreehette	023-05-01			
265 01	Date Finalized			
Shayla Frechette Senior Compliance & Enforcement Officer	2023-05-04			
Appendices				
Appendix 1-LNG Canada E15-01-TOC				
Appendix 2- LNG Canada Wildlife Management Plan				
Appendix 3- Bat Box Monitoring Report				
Appendix 4- LNG Canada Community Level Infrastructure and Services Management Plan (CLISMP)				
Appendix 5- LNG Canada Construction Environmental Management Plan				
Appendix 6- LNGC - Section 53b Order to Remedy 2020-010 Appendix 7- External Walk INSP-0005056284 January 23 2023				
Appendix 7- External Walk_INSP-0005199922 February 19 2023				
Appendix 9 - Safety Walk_Departments External_ January 1-31 2023				
Appendix 10- Safety Walk_Departments External_February 1-28 2023				
Appendix 11- CVL Waste Bill of Lading_Jan_2023				
Appendix 12- CVL Waste Bill of Lading_Feb 2023				
Appendix 13- CVL Waste Log Jan_Feb 2023				
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