

Project Name	Coastal GasLink Pipeline Project	Inspection Status	Final
EA Certificate #	E14-03	Inspection No.	IR2020-024
Project Status	Certified	Inspection Start	2020-05-13
Sector	Energy	UTM	10U 384635 5991618
Trigger	Planned Inspection	Inspection Type	Field
Project Description	The Coastal GasLink Pipeline Project (Project) is an approximately 650 kilometre (km) long natural gas pipeline connecting facilities in the vicinity of northeast British Columbia (B.C.) to the LNG Canada facility near Kitimat.		
Location Description	The Project is in the vicinity of Groundbirch (40 km west of Dawson Creek) in northeast B.C. and connects to the LNG Canada facility near Kitimat. This inspection focused on construction works within Section 5 of the Project at the Lejac Multi-Use Site (MUS) located near Fraser Lake, B.C.		
Inspection Summary	<p>On May 13, 2020 Environmental Assessment Office Compliance & Enforcement Officers Mike Bartos and Clayton Smith (EAO C&E) inspected the Project against the requirements of EAC #E14-03, Environmental Management Plan Revision 4 (EMP), dated December 14, 2018, EMP Appendix C: Contingency Plans, and EMP Appendix D: Management Plans (refer to Appendices 1 through 7).</p> <p>The Project was in the Construction phase at the time of inspection. The inspection areas included Construction and Operation works at located at:</p> <ul style="list-style-type: none"> Lejac Multi-Use Site (MUS), also known as “Little Rock Lake Lodge” located off Highway 16 in Lejac, B.C. The MUS is divided into Area A – Camp and Area B – Construction Laydown. The MUS is being constructed as part of a Project Agreement between CGL and Nadleh Whut’en First Nation. <p>The purpose of the inspection was to inspect and follow-up with erosion and sediment control (ESC) measures and functionality of the perimeter fence as per the December 11, 2019 EAO C&E inspection (refer to Appendix 8). In addition, EAO C&E also inspected the Project’s management of solid/hazardous waste and topsoil stockpiles. Representatives from Coastal GasLink (CGL) accompanied EAO C&E during the inspection.</p> <p>After review of observations and information obtained during the inspection, the following compliance determinations have been made:</p> <ol style="list-style-type: none"> NOT COMPLIANT with Condition 4 of Schedule B regarding water quality monitoring; NOT COMPLIANT with Condition 26 of Schedule B regarding erosion and sediment control measures for soils and berms; NOT COMPLIANT with Condition 26 of Schedule B regarding functionality and effectiveness of electric fence; NOT COMPLIANT with Condition 26 of Schedule B regarding waste management; and, 		

	<p>5. NOT COMPLIANT with Condition 26 of Schedule B regarding mitigation to control weed establishment.</p> <p>Additional details regarding these findings may be found in the sections below.</p> <p>The compliance determinations in this report reflect the findings from the inspection dates noted above. These determinations can change at any time upon information gathered through future inspections or if new information is obtained by EAO C&E.</p>
In attendance	Lead Environmental Inspector, Coastal GasLink Environmental Inspector, Coastal GasLink
Certificate Holder	Coastal GasLink Pipeline Ltd.
Mailing Address	450 1 st Street S.W. Calgary, AB T2P 5H1
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INSPECTION DETAILS

Requirement 1: EAC Condition 4 of Schedule B

The Holder must develop and implement a Water Quality Monitoring Plan, in consultation with OGC, to address onsite water quality monitoring associated with the Construction phase of the Project where works are planned for in-stream works within the Riparian Reserve Zone of an S1, S2, S3, or within 20m of an S4 stream, as identified by the OGAA, unless otherwise authorized by OGC or DFO.

The Water Quality Monitoring Plan must be consistent with the following as they apply to aquatic life:

- the BC Ambient Water Quality Guidelines (Criteria) for Turbidity, Suspended and Benthic Sediments;
- the BC Ambient Water Quality Criteria for pH or, if applicable;
- the BC Water Quality Objectives established by MOE as of the date of this EAC with respect to turbidity, total suspended solids, benthic sediments, and pH.

A Qualified Professional must develop and supervise the implementation of the Water Quality Monitoring Plan.

The Plan must include monitoring at upstream locations and downstream of the location of disturbance to develop baseline information.

The Plan must include measures to identify and report to OGC any exceedances of the above Water Quality Guidelines or Objectives.

For exceedances of the above Water Quality Guidelines or Objectives that are caused by, or contributed to by Construction activities, the Holder must undertake measures to remedy the factors producing the exceedance, in consultation with OGC.

In order to allow for 30 days review and comment, the Holder must provide the Plan to EAO no less than 60 days prior to the Holder's planned date to commence Construction. Once the Plan is complete, the Plan must be submitted to OGC.

The Holder must maintain records of the data collected during the implementation of Water Quality Monitoring Plan throughout the Construction phase of the Project and provide those records to OGC and EAO upon request.

Coastal GasLink Pipeline Project, Water Quality Monitoring Plan

Section 2.1 Implementation Zone

Water quality monitoring will be conducted during the construction phase of the Project where construction activities are planned for in-stream works within the riparian reserve zone (RRZ) of an S1, S2 or S3, or within 20 m of an S4 stream, and at all fish-bearing surface waters, such as ponds and wetlands.

Findings:

During the inspection of the Lejac MUS EAO C&E observed the pumping of turbid water out of an on-site settling pond, causing discharge water to migrate off the MUS footprint onto Canadian National Railway (CN Rail) property and subsequently into Fraser Lake via a nearby culvert (refer to photos 1 through 5). CGL representatives advised EAO C&E that no water quality testing was conducted prior to or during the dewatering of the settling pond.

EAO C&E observed that the erosion and sediment control measures at the pond's outlet had failed and were both overwhelmed and ineffective in mitigating the turbid water, by allowing the sediment to settle out (refer to photo 2). The settling pond is constructed in a manner to allow for a passive discharge through a partially rock lined outlet channel into a previously existing natural drainage feature and then into the environment when the pond is overwhelmed (refer to photo 1). However, the pond was being actively drawn down and discharged outside of the MUS boundary using pumps outfitted with filter bags at the hose outlet during the EAO C&E inspection; passive pond discharge was not taking place. Additionally, when EAO C&E asked the CGL representatives where the water from the pond ultimately reports to and if the drainage which the water was being pumped into has connectivity to Fraser Lake, the representatives told EAO C&E that the water flows downstream towards the CN Rail tracks and that they did not think the water had connectivity to Fraser Lake. EAO C&E walked the drainage downstream of the MUS approximately 230 metres (m) to where the water meets the CN Rail tracks. From there EAO C&E followed the water flow an additional 380 m (approximate) east to a culvert beneath the train tracks which discharges directly to Fraser Lake (refer to photo 5). EAO C&E did not observe turbid water directly entering Fraser Lake; the water appeared to clear prior to entering the culvert.

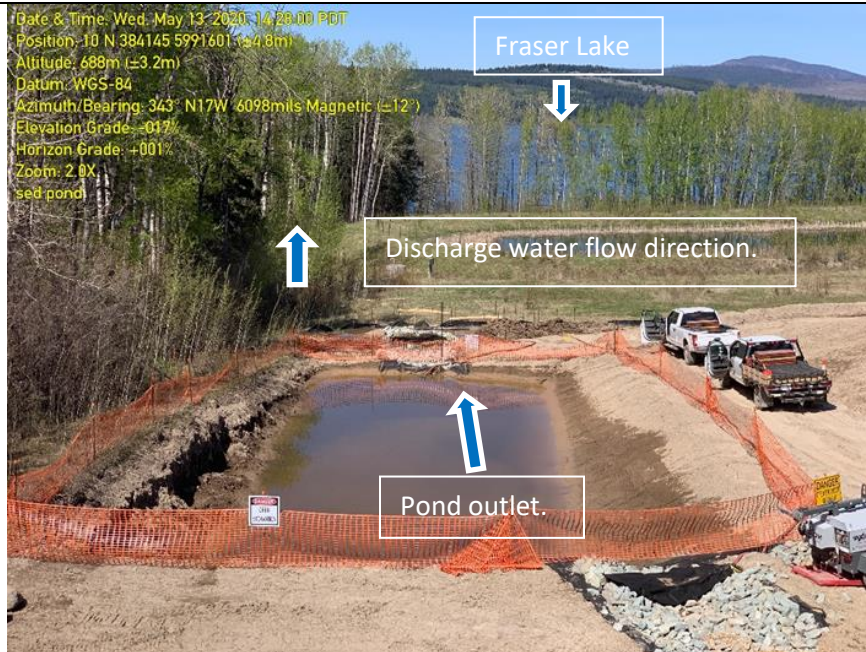


Photo 1: Settling pond with draw down taking place; high water mark visible. Note pond failure on left hand corner; introducing additional sediment into the pond.



Photo 2: Failing ESC measures at boundary of Lejac MUS; ineffective in mitigating the turbid water discharge through active pumping.



Photo 3: Turbid water flowing from the settling pond along the drainage. Looking upstream towards sediment pond outlet.

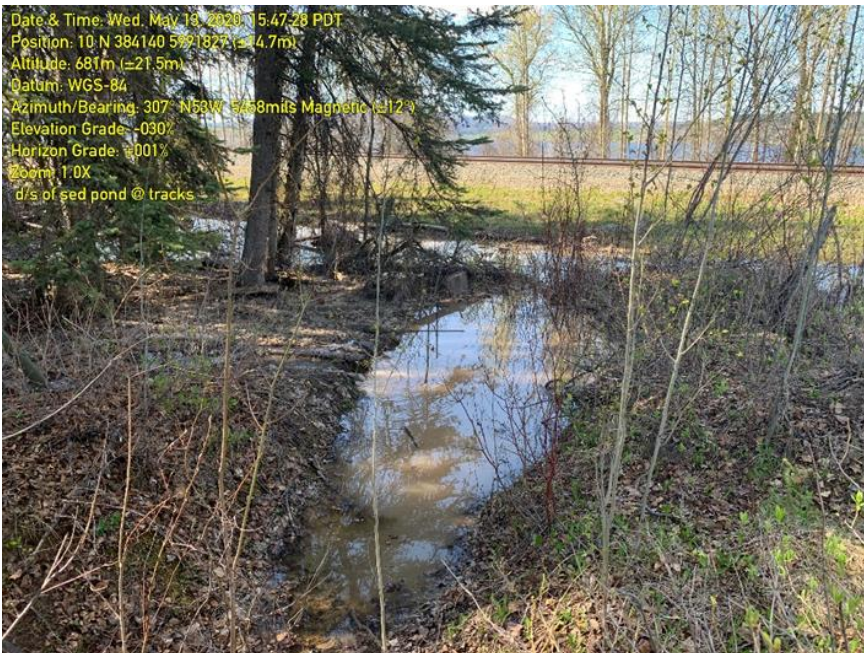


Photo 4: Same location as above photo – looking downstream. Turbid water discharged along CN Rail right of way. Train tracks and Fraser Lake in background.



Photo 5: Culvert inlet leading beneath CN Rail tracks and directly into Fraser Lake, located within CN Rail right of way. Non-functioning ESC measures installed across the drainage.

The Certificate Holder was provided two Opportunities to Respond to this Inspection Record. During the first Opportunity to Respond the Certificate Holder included the following response in part (Appendix 9):

In terms of the site water management, Coastal GasLink confirms that grading of the site directs surface water to one of two stormwater ponds on the north side of the site (see the ESC Plan in Attachment 1). As noted in the Inspection Record, the pond (located in the northwest corner of the MUS) collects the surface water to allow sediment particles to settle out before passively discharging the water into an existing natural drainage. At the time of the inspection, the pond was being actively drawn down using pumps to allow the soils to dry out in preparation for pond replacement. The water was pumped from the pond to a filter bag (filter bag sitting atop the rock riprap at pond outlet in Photo 2 of the Inspection Record). The surface water passed through the filter bag and entered the natural drainage moving across Seaspunkut 4 Reserve land before entering the CN Rail right of way. Coastal GasLink acknowledges that the water was turbid, as runoff from the snow stockpile (shown in Photo 8 of the Inspection Record) bypassed the stormwater ponds before entering the natural drainage leaving the site.

Following the first Opportunity to Respond, EAO C&E allowed for a second Opportunity to Respond for the Certificate Holder to provide water quality monitoring data during all times the sediment ponds at the Lejac MUS have been drained using pumps. The Certificate Holder included the following response in part (Appendix 10):

Water quality monitoring is determined on a site by site basis using a risk-based assessment. At the time of the inspection, water was being pumped from the sediment pond on the Little Rock Lake Lodge multi-use site (MUS). The water was visibly turbid however the water needed to travel approximately 600 m along a vegetated drainage channel before it reached Fraser Lake. Due to the distance between the location of the sediment pond and the point of entry to Fraser Lake and the fact that surface water pools in the railroad bar

ditch prior to going through the culvert thus allowing additional time for any sediment to settle out, water quality monitoring of Fraser Lake was not determined to be necessary.

The response provided during the second Opportunity to Respond does not align with the information collected in the field by EAO C&E during the time of the inspection. When both the Lead Environmental Inspector and the Environmental Inspector representing Coastal GasLink were asked about water quality sampling by EAO C&E neither discussed the forethought provided in Coastal GasLink's above response. Both individuals stated they were not aware of water quality monitoring taking place and a rationale as to why was not provided. This does not align with the above response. Additionally, neither representative displayed an understanding of where the water from the sediment pond, which was being actively drawn down using pumps, reported to. From what EAO C&E was told at the time of the inspection it was not until EAO C&E walked the drainage downstream and discovered the culvert that the representatives were aware of the water's connectivity to Fraser Lake.

On November 19, 2020 Coastal GasLink chose to provide a third response to this finding (Appendix 11). In that response the Certificate Holder states in part:

In advance of the EAO inspection, the Environmental Inspectors were aware that the turbid water being pumped from the sediment pond was flowing downslope and into the railroad bar ditch. The bar ditch was walked approximately 100 m in either direction from where the water entered and an outlet (the culvert) was not identified at that time. Based on the size of the bar ditch and limited flow, the Environmental Inspectors determined that there was sufficient area for any sediment suspended in the water to settle out prior to reaching a sensitive receptor. Photo 8 (Photo 5 above) in the Inspection Record IR2020-024 provided to Coastal GasLink on October 13, 2020 appears to provide evidence of the effectiveness of the railroad bar ditch as the surface water appears to be clear in the photo provided by EAO Compliance and Enforcement.

As Coastal GasLink does not currently have written documentation to support the Environmental Inspectors' determination regarding water quality monitoring for pumping of the sediment pond that occurred at the time of the EAO inspection nor for subsequent pumping events in relation to this request, this has been identified as a gap. In follow up to this inspection, Coastal GasLink is reviewing the decision process and documentation for water quality monitoring when pumping from ponds on multi-use sites.

The third response provided by Coastal GasLink confirms that no water quality sampling was conducted during sediment pond draw down. This response also confirms that representatives from Coastal GasLink were not aware of the culvert which leads to Fraser Lake as they did not walk the full extent of the drainage to investigate where the water reports to prior to moving forward with pond draw down. EAO C&E notes that the flow experienced from the draw down of the sediment ponds using 2-inch pumps was not "limited flow". The flow was consistent and uninterrupted as the sediment ponds, which capture surface run off from a large catchment area, were being drawn down using pumps.

The water pumped from the sediment ponds drains off-site, through a drainage channel, along the CN Rail tracks and into a culvert which reports directly to a fish-bearing surface water source approximately 610 m downstream (Fraser Lake), as determined in the field by EAO C&E. CGL's Water Quality Monitoring Plan includes the requirement to monitor water quality "at all fish-bearing surface waters". Water quality monitoring has not taken place during sediment pond draw down although the water has potential to reach a fish-bearing surface water source. Although no sediment deposition or sediment laden water was observed within Fraser Lake by EAO C&E during the time of the inspection, confirmation of adherence to BC Ambient

Water Quality Guidelines cannot be determined without information from water sampling. No water quality sampling information was collected during sediment pond draw down events and therefore could not be provided to EAO C&E from the Certificate Holder upon request. As a result, the Certificate Holder is non-compliant with the requirement to conduct water quality monitoring at all fish-bearing surface waters.

Compliance Determination: Out - Warning - Refer to Enforcement Summary, Referred to Canadian National Railway

Requirement 2: EAC Condition 26 of Schedule B

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 25 and Appendix 2A of the Application.

The Holder must develop the EMP in consultation with the Relevant Regulatory Authorities and Aboriginal Groups for the approval of EAO per Appendix A to this EAC.

The Holder must not commence Construction until the EMP has been approved. The EMP approved must be submitted to OGC prior to the Holder's planned date to commence Construction.

The Holder must carry out a Post-Construction Monitoring Program to monitor and report on the effectiveness of the mitigation set out in the EMP.

Environmental Management Plan – Section 8.3 Surface Material Removal, Salvage and Grading

Stabilize exposed surface material and subsoil where the potential for erosion exists. Refer to the Soil Erosion Contingency Plan (Appendix C.7) for additional information.

Appendix C.7 Soil Erosion Contingency Plan, Water and Wind Erosion

Implement one or a combination of the following mitigation:

- Install silt fences near the base of slopes
- Armour the upslope face of berms with geotextile, rock, logs or sandbags
- Reseed an annual cover crop as soon as practical after construction

Findings:

EAO C&E inspected topsoil berms and soil stockpiles located within Lejac MUS. EAO C&E observed erosion and sediment control (ESC) efforts were being partially implemented on some soil stockpiles (refer to Photos 6 through 8). EAO C&E did not observe evidence of hydroseeding, broadcast seeding or application of a tackifier on exposed soils. CGL representatives indicated a cover crop would be used this year to seed soil piles. As per information provided by CGL representatives, ESC measures for the MUS are being constructed in accordance to an engineered drainage plan developed by R.Radloff and Associates Inc (Radloff).



Photo 6: Soil Stockpile with no silt fence installed along base of slope, no evidence of seeding. Sluffing of soils depicted.



Photo 7: Soil pile with no silt fence installed along base of slope, no evidence of seeding. Vegetative growth depicted in background is weed growth associated with the seed bank within the soil pile.



Photo 8: Snow stockpile depicted in background, ESC measures of wattle and silt fencing.

EAO C&E observations of on-site soil erosion mitigation indicates CGL is in the process of establishing ESC measures where applicable. Due to on-going construction activities, EAO C&E did identify some exposed soils that did not have ESC measures implemented. The Certificate Holder appears to be non-compliant with the above requirement to stabilize exposed material and implement the Soil Erosion Contingency Plan as there is inconsistent implementation of ESC techniques. ESC measures are to stabilize topsoil berms, soil stockpiles, and exposed slopes within the MUS. In addition, ESC measures were not implemented in an effective manner to mitigate turbid water from entering a nearby waterbody (see requirement 1).

During the Opportunity to Respond to this Inspection Record, the Certificate Holder provided an Erosion and Sediment Control Site Plan (Appendix 9) for the MUS and included the following response in part:

Since the time of the inspection, both subsoil stockpiles have been sprayed with hydro-mulch and are vegetated. The topsoil stockpile to the south is in construction phase as the material from this stockpile has been mostly relocated to the north side of the site to a new (since time of inspection) stockpile. The remainder of topsoil left in the south will be utilized on the slope of the pad once the pad construction is complete.

At the time of the EAO C&E inspection, surface materials were found to be exposed and not stabilized. Based on the information provided by the Certificate Holder during the Opportunity to Respond, it appears that the Project has worked to stabilize exposed surface materials at the Lejac MUS by use of hydro-seeding since the inspection date of May 13, 2020. EAO C&E will conduct future inspections to confirm compliance with the above requirements at this location

Compliance Determination: Out - Notice of Non-Compliance

Requirement 3: EAC Condition 26 of Schedule B
Environmental Management Plan – Appendix D
D.9 Human-Wildlife Conflict Management Plan

Table 4-1: Human-Wildlife Conflict Mitigation

- Enclose camps with electric fencing to deter access to camps by bears.
- Develop appropriate road, camp and worksite strategies to prevent human-wildlife contact, food conditioning, habituation and conflict. Carefully monitor wildlife sightings, document concerns and identify opportunities to further reduce the potential for human-wildlife conflict through adaptive management.

Findings:

EAO C&E inspected the electric fence enclosing the entire MUS. (refer to Photos 9 through 12). CGL representatives advised that the electric fence was activated on May 7, 2020. For the purpose of the inspection, EAO C&E requested CGL representatives to confirm effective operation of electric fence. CGL representatives were unable to test the voltage of the electric fence as they did not have access to an electrician or handheld electric fence tester.



Photo 9: Electric fence energizer box – power indicator light not on.

EAO C&E tested the functionality of the compound access gates and determined the gates do not “self close” after being opened (refer to Photo 10). EAO C&E identified spacing beneath and around main access gates that can allow unobstructed access into enclosure by small wildlife such as coyotes and even potentially smaller sized bears (refer to photo 11). EAO C&E identified the area of fence line located in the northeast corner has experienced water erosion which has created a potential access for wildlife into the MUS. This location was first identified and documented by EAO C&E via the December 11, 2020 EAO C&E inspection (refer to photo 12 and Appendix 8). This segment of the fence has not been remedied since being identified.



Photo 10: Access gate without functioning "self close" mechanism.



Photo 11: Main access gates depicting spacing beneath and around gate which allows access into enclosure by small wildlife.



Photo 12: Northeast corner of fence line where water erosion has created a hole for animals to gain access into MUS. First identified as deficient by EAO C&E in December 2019.

EAO C&E observations indicate that the camp is surrounded by an electrified fence; however, the functionality could not be displayed by the Certificate Holder or evaluated due to the lack of either a visual display reading on the energizer box or an on-site voltage tester. EAO C&E also noted further improvement is required to remedy spacing beneath and around access gates and fence line perimeter.

During the Opportunity to Respond to this Inspection Record the Certificate Holder provided additional information (Appendix 9) regarding the functionality of this electric fence, including:

- Photographs taken October 21, 2020 confirming electric fence functionality using a handheld voltage meter in the North, South, East and West portions of the fence line. The photographs show voltage readings ranging from 8.5 KV to 9.1 KV;
- Photographs confirming that materials have been added under the main gates to reduce the spacing identified beneath and around main access gates;
- Photograph showing that the gap under the gate in the NE corner has been remedied; and,
- Photographs showing that access gates have bungee cords attached to assist with gates closing and not remaining open unintentionally.

Compliance Determination: Out - Warning - Refer to Enforcement Summary

Requirement 4: EAC Condition 26 of Schedule B
Environmental Management Plan – Appendix D
D.1 Chemical and Waste Management Plan
D.1.3 Guiding Principles

- Waste and hazardous materials will, to the extent practical, be recycled, disposed of or moved to an approved area as required.

D.1.4 Mitigation
Waste Disposal

- Equip each construction site with adequate garbage receptacles for solid non-hazardous wastes and debris. These materials will be collected, as required, and disposed of at approved locations. Food wastes will be stored in animal-proof (bear-proof) containers and transported to an appropriate landfill site.
- Receptacles for industrial wastes and hazardous waste generated during construction will be provided in order to keep them segregated from non-hazardous waste. Used oil and oil filters will be placed in sealed containers and delivered for disposal by a qualified service contractor.
- Receptacles for recycling various products (e.g., paper and tin) will be available at Project construction yards and camps and will be hauled to appropriate recycling depots.

Findings:

EAO C&E inspected the Lejac MUS for potential wildlife attractants and waste management practices. Waste storage bins were inspected to ensure appropriate segregation was taking place and general waste disposal practices were also inspected. EAO C&E observed food waste and cooking oil were being stored in animal proof (bear-proof) containers. Waste bins were labelled and secured. For reference, refer to Photos 13 to 17 for EAO C&E depiction of waste management containment. EAO C&E inspected hazardous waste container for waste oil, oil filters, contaminated soils, etc., located throughout MUS.



Photo 13: Secure container of cooking oil and kitchen grease.



Photo 14: Area A, Plastic and tin containers for recycling.

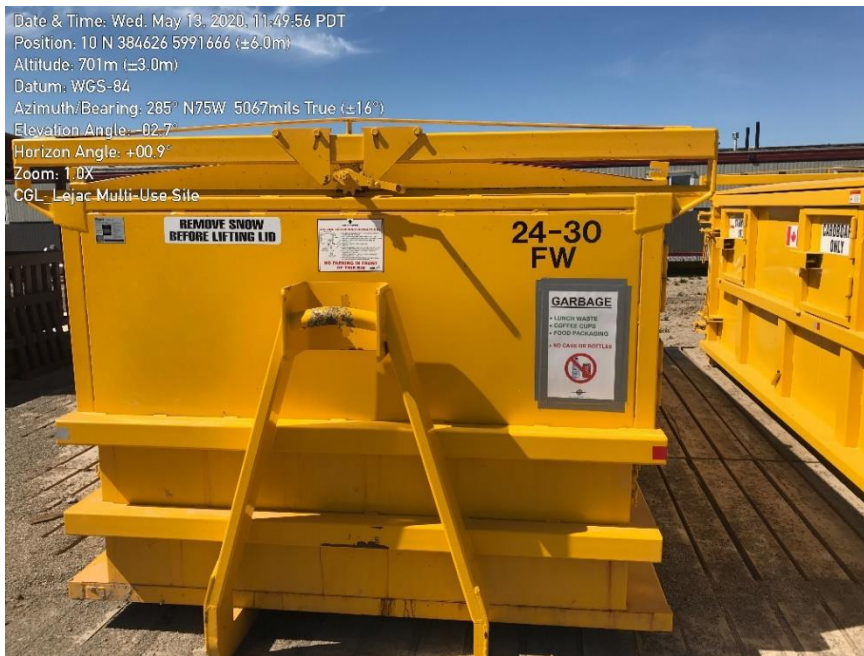


Photo 15: Area A, Bear proof container for general waste.



Photo 16: Area A, Hazardous waste containers for contaminated soils.



Photo 17: Area A, Hazardous waste containers for hydrocarbon products.

In general, appropriate disposal bins are available throughout the site to segregate waste (general and industrial) and to limit animal attractants. A recycling program and waste management plan is established at Lejac MUS. However, EAO C&E identified waste management at the workforce accommodation site in Area A did not have receptacles for the recycling of various products (none merchantable) such as mixed plastics, glass bottles/jars and tin. Due to Covid-19 safety policies, EAO C&E did not enter camp facilities to inspect indoor recycling practice.

According to the Regional District of Bulkley Nechako (RDBN) Recycling website, Fraser Lake/Vanderhoof Transfer Station and Recycling Depots do accept a variety of items, including mixed plastics and tin.

For reference, see RDBN recycling website: <https://www.rdbn.bc.ca/departments/environmental-services/recycling/recycling-in-the-rdbn/recycling-facilities>.

During the Opportunity to Respond to this Inspection Record the Certificate Holder provided the following response to this item:

Since time of this inspection, Coastal GasLink has engaged the subcontractor responsible for waste management services to ensure bins are available for recyclable materials applicable in this area.

Compliance Determination: Out - Notice of Non-Compliance

Requirement 5: EAC Condition 26 of Schedule B

Environmental Management Plan – Appendix D

D.10 Invasive Plant Management Plan

Table 5-1: Mitigation to Prevent Weed Establishment

- Post signs at areas identified as having noxious weed infestations before starting construction.

Table 5-2: Mitigation to Control Weed Establishment – Weeds

- Monitor topsoil and surface material piles for weed growth during construction and implement corrective measures (e.g., spraying, mowing, hand pulling) to avoid infestation, when warranted.
- Record locations of equipment weed cleaning sites and monitor during the following growing season. Longer term monitoring may be required for slow germinating species.
- Additional mitigation to reduce weed growth and spread may be warranted if grade/surface material replacement is delayed because of construction scheduling.

Findings:

Lejac MUS is identified as being a “noxious weed site” and requires management in accordance with the Invasive Plant Management Plan (refer to photo 18). EAO C&E inspected two topsoil piles where invasive weeds were segregated and isolated from main soil stockpiles. Most noxious weed sites were delineated by use of silt fencing and made identifiable by use of signage. According to CGL representatives, common tansy (*Tanacetum vulgare*) was identified as being the invasive plant species being controlled. One topsoil stockpile was not tarped and showed weed growth (refer to photos 19 and 20). The other topsoil pile known to contain invasive plants was tarped to prevent further germination of topsoil piles (refer to photo 22). One soil stockpile located adjacent to a noxious weed site was observed to have weed growth, which is not identified with a sign, as per the requirement (refer to photo 21).



Photo 18: Access into Lejac MUS identifies the laydown as being a “noxious weed site.”



Photo 19: Area A, Topsoil stockpile depicting noxious weed growth.

Date & Time: Wed, May 13, 2020, 14:28:20 PDT
Position: 10 N 384164 5991494 (± 4.9 m)
Altitude: 691m (± 3.1 m)
Datum: WGS-84
Azimuth/Bearing: 090° S90E 1600mils Magnetic ($\pm 12^\circ$)
Elevation Grade: -011%
Horizon Grade: -002%
Zoom: 1.0X
A pile with invasive



Photo 20: Area A, Topsoil stockpile depicting noxious weed growth.



Photo 21: Area A, Noxious weed growth depicted on adjacent soil stockpile, no signage or mitigation measures implemented.



Photo 22: Area B, Covered topsoil stockpile to control noxious weeds.

Based on observations made by EAO C&E, some mitigation measures are being implemented to manage noxious weeds, however, management practices are not being applied consistently across the MUS. CGL representatives indicated the management of noxious weeds at this MUS is by mechanical clearing. EAO C&E was not provided a definitive weed clearing schedule nor a rationale for why one soil stockpile was covered and the soil stockpile exhibiting weed growth was not covered. EAO C&E did not observe or inspect an established location designated for equipment weed cleaning.

To support this inspection record, EAO C&E requested additional information from CGL with respect to noxious weed management. During the Opportunity to Respond to this Inspection Record the Certificate Holder provided the following response:

Weed management was undertaken at Little Rock Lake Lodge every two to three weeks through the summer of 2020. Coastal GasLink confirms that either mechanical weed removal or handpicking (or both) occurred on the following dates:

- May 15, 16, 19, 20, 22
- June 12, 13, 24, 25, 29
- July 6-10, 13-17, 20-23
- August 10-13
- September 2-4, 8-10, and
- October 1-7

As noted during the inspection on May 13, 2020, weed management of the soil stockpiles on the MUS varied depending on the type of material and length of storage.

- *Stockpile in Area A (south side of site), as noted in Photo 20 of the Inspection Record, contained topsoil however it was not tarped at time of inspection as this pile was expected to have additional disturbance in the near future.*

- *Stockpile in Area B (Photo 22 from Inspection Record) was tarped as it contained topsoil and will not be disturbed until reclamation of the site.*
- *Two subsoil stockpiles at the east and west sides of the MUS were hydroseeded shortly after the inspection occurred and are included in the weed control program.*
- *Small topsoil stockpile just inside North fence was either to be hydroseeded and added to the control program or tarped. After the inspection, this stockpile was hydroseeded and added to the weed control program.*

Based on this information, Coastal GasLink submits that the MUS is compliant with the Invasive Plant Management Plan.

The information provided by the Certificate Holder to EAO C&E appears to provide evidence that the Invasive Plant Management Plan has been actioned at the Lejac MUS in the Spring and Summer of 2020. However, the requirement to post signs at areas identified as having noxious weed infestations before starting construction was not met during the time of the inspection. EAO C&E will follow up on these requirements during future inspections.

Compliance Determination: Out - Notice of Non-Compliance

Actions Required by Certificate Holder & Additional Comments

None at this time.

Enforcement Summary

COASTAL GASLINK PIPELINE LTD. IS WARNED THAT THE PROJECT IS NOT COMPLIANT WITH CONDITION #26 OF EAC# E14-03 REGARDING:

- **Water Quality Monitoring – Requirement 1 above.**
- **Functionality and Effectiveness of Electric Fence – Requirement 3 above.**

IN ADDITION, COASTAL GASLINK PIPELINE LTD. IS NOT COMPLIANT WITH CONDITION #26 OF EAC #E14-03 AND IS ISSUED NOTICES OF NON-COMPLIANCE REGARDING:

- **The Soil Erosion Contingency Plan – Requirement 2 above.**
- **Waste Management – Requirement 4 above.**
- **Mitigation to Control Weed Establishment – Requirement 5 above.**

EAO C&E MAY INSPECT TO DETERMINE IF THE COASTAL GASLINK PIPELINE PROJECT HAS BEEN BROUGHT BACK INTO COMPLIANCE WITH THESE REQUIREMENTS. CONTINUED NON-COMPLIANCE WITH THESE REQUIREMENTS MAY RESULT IN ADDITIONAL ENFORCEMENT UNDER THE ENVIRONMENTAL ASSESSMENT ACT. SEE REGULATORY CONSIDERATIONS SECTION FOR ADDITIONAL INFORMATION.

Regulatory Considerations

None at this time.

Inspection Conducted by

Mike Bartos
Compliance & Enforcement Officer

Date Sent to Certificate Holder for Opportunity to Respond
2020-10-13

 Clayton Smith Senior Compliance & Enforcement Officer	Date Sent to Certificate Holder for Second Opportunity to Respond 2020-11-10
	Date Finalized 2020-12-22
Appendices	
Appendix 1: E14-03 Appendix 2: Environmental Assessment Certificate (EAC) #E14-03_Amendment 1 Appendix 3: EAC Schedule A Appendix 4: EAC Schedule B Appendix 5: CGL, Environmental Management Plan_2018 Appendix 6: CGL, Environmental Management Plan_Appendix C Contingency Plans Appendix 7: CGL, Environmental Management Plan_Appendix D Management Plans Appendix 8: EAO C&E Inspection Record_IR2019-064 Appendix 9: CGL4701-CGP-BCEAO-REG-LTR_4245 OTR IR2020-024 Appendix 10: CGL4703-CGP-BCEAO-REG-LTR-4280_OTR 2_IR2020-024 Appendix 11: CGL4703-CGP-BCEAO-REG-LTR-4280_OTR 2_IR2020-024_rev1	
Environmental Assessment Office - Compliance & Enforcement Branch	
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