

Project Name	Coastal Gaslink Pipeline Project	Inspection Status	Final
EA Certificate #	E14-03	Inspection No.	IR2021-027
Project Status	Certified	Inspection Start	2021-10-14
Sector	Energy	UTM	10U 533697 E 6071620 N
Trigger	Planned Inspection	Inspection Type	Field
Project Description	The Coastal GasLink Pipeline Project (Project) is an approximately 650 kilometer (km) long natural gas pipeline connecting facilities in northeast British Columbia (BC) to the LNG Canada facility near Kitimat.		
Location Description	The Project is near Groundbirch (40 km west of Dawson Creek) in northeast BC to the LNG Canada facility near Kitimat. This inspection covered work being carried out in Sections 1, 2 3, 4, 6, 7 and eastern 8 of the Project.		
Inspection Summary	<p>From October 14 to October 21, 2021 Environmental Assessment Office (EAO) Director of Compliance and Enforcement Chris PARKS and Senior Compliance and Enforcement Officer Clayton SMITH (collectively EAO C&E) inspected the Project against requirements of the Environmental Assessment Certificate (EAC) #E14-03 (Appendix 1).</p> <p>The Project was in Construction at the time of inspection. Project areas inspected include Sections 1, 2, 3, 4, 6, 7 and eastern 8 covering various locations from roughly Chetwynd, B.C. to Burns Lake, B.C.</p> <p>This inspection included a virtual debrief of observations with Project staff at approximately 0800 hours on October 27, 2021.</p> <p>The following final compliance determinations have been made:</p> <ol style="list-style-type: none"> 1. NOT COMPLIANT with EN2020-011 regarding controlling the risk of sediment transport to Environmentally Sensitive Receptors, watercourses. 2. NOT COMPLIANT with EN2020-011 regarding controlling the risk of sediment transport to Environmentally Sensitive Receptors, wetlands. 3. NOT COMPLIANT with EN2019-003 regarding storing waste in animal proof containers. 4. NOT COMPLIANT with Condition 26 of Schedule B regarding providing secondary containment for all chemical liquids and hazardous wastes. 5. NOT COMPLIANT with Condition 26 of Schedule B regarding ensuring that ice, snow, or rainwater have not decreased the volumetric capacity for storage of a spill to be less than 125% of the containment area. 6. NOT COMPLIANT with Condition 26 of Schedule B regarding enclosing camps with electric fencing to deter access to camps by bears. 7. NOT COMPLIANT with Condition 26 of Schedule B regarding ensuring equipment is well maintained and free of fluid leaks. <p>Additional detail 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	No Certificate Holder staff attendance during this inspection.
Certificate Holder	Coastal GasLink Pipeline Ltd.
Mailing Address	450 1 st Street S.W. Calgary, AB T2P 5H1
Contact	Dan WYMAN, Regulatory Team Lead, Coastal GasLink, TransCanada
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INSPECTION DETAILS

Requirement 1: Environmental Assessment Act, 2018, Order Under Section 53(1) (Appendix 5)

EN2020-011, December 8, 2020

- 1) Control the risk of sediment transport to Environmentally Sensitive Receptors by implementing the following:
- Stabilize exposed surface material and subsoil during and after Project works where potential for erosion exists;
 - Plan and install erosion and sediment control measures before, during and after Project works; and,
 - Maintain these measures during and after Project works to ensure they continue to function as intended.

Condition 26

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 25 and Appendix 2A of the Application. *See Appendix 3 for full Condition wording.*

Coastal GasLink Pipeline Project, Environmental Management Plan (Appendix 4)

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.

Findings:

Over the course of the inspection, EAO C&E observed various instances where sediment laden Project water had left the right of way (ROW) and transported to environmentally sensitive receptors (watercourses). The following are examples of locations where the release of sediment laden Project water into watercourses was observed:

- KP180+400 –EAO C&E observed a sump being pumped down and discharging through a filter bag into an adjacent cut block. Water flows from filter bag through the cut block and to a culvert on Shoofly (SF) 12 then to a non classified drainage (NCD). The NCD flows approximately 170 m down slope and drains into an S2 (fish-bearing stream >5 – 20 m) stream feature. Evidence of sediment deposited in the vegetation up to the banks of the S2 stream was observed. Sediment laden water reached the S2 previously, as reported by the Independent Erosion and Sediment Control Auditor (IESCA) but was not actively discharging into the stream while EAO C&E was on site. On October 18, 2021 the IESCA issued an incident notification (number 129) for this site which documented Project inputs of sediment laden water into the S2 stream feature.



Photo 1. Downslope of KP180+400, sediment laden Project water reaching S2 feature (WC194). Photo taken by the IESCA on October 16, 2021.

- KP208+518, (WC ID 230, S3) Tributary to the Crooked River. Observed a sump on low chain side which reports to an NCD then an S3 stream upstream of crossing. The sump was actively discharging sediment laden Project water into the channel. Erosion and sediment controls on low chain approach not maintained, effective, and/or improperly installed.



Photo 2. KP 208+518 as seen from the air on October 15, 2021.

- KP214+750 (Site Id 239, S3) – Sumps on high chain side of the crossing overwhelmed with sediment laden Project water. Sumps discharging into S3 stream downstream of the crossing. Visible plume of sediment laden water reaching the S3. Work was being carried out to address one of the two sumps while EAO C&E was on site. However, while the repairs to the first sump were taking place the second sump was overflowing and discharging into the S3 stream.
- KP219+720 (WC 104C) – Water from sump at crossing being pumped to filter bag. Filter bag set in location where water flows back downslope and enters the watercourse downstream of the crossing. Plume of sediment laden Project water visible in stream during EAO C&Es inspection.
- KP223+578 (S4) – Low chain side sumps were being drained using pumps and were discharging into the forest through filter bags. Water leaves the filter bags and flows through an old cut block for approximately 240 m before the sediment laden Project water enters the watercourse slightly upstream of the crossing.
- KP229+909. Tributary to Peculiar Creek. On the low chain side of the crossing the river was receiving sediment laden water generated from Davie Peculiar FSR and work area (rig mat staging/loading). Sediment laden Project water was entering an NCD which then becomes an S4 stream, before entering Peculiar Creek. On the low chain side, Project traffic on Davie Peculiar FSR causing significant inputs to S3 watercourse which then enters Peculiar Creek upstream of crossing.
- KP231+021 – Sump on ROW discharging sediment laden Project water to a small draw / channel and flowing directly into Peculiar Creek on the low chain side of this crossing. Swale from road also directs road run off into the forest – this flow also drains into Peculiar Creek.



Photo 3. Sediment laden water from ROW reaching Peculiar Creek.

- Shoofly 16a (roughly KP188+700) – Sediment laden Project water draining into a non-visible channel (NVC). NVC was receiving enough water that it was flowing while EAO C&E was on site. The NVC flows along the ditch on the 800 Road and crosses through a culvert where it then drains into an NCD outside of the ROW. Sediment laden Project water observed to reach the NCD.
- “Goat trail” Shoofly off the Davie Peculiar FSR (KP 232+900 approximate crossing of ROW). Access road has been brushed out by the Project. Project traffic only on this access road; road dead ends at the ROW. Near the head of the road a watercourse crosses beneath the road through a previously existing culvert. At the culvert crossing a large puddle of turbid water discharges sediment laden water into the creek/wetland complex when traffic passes through the puddle.
- Shoofly 23 off Davie Muskeg road (roughly KP234+500) – Sump in place on ROW with sediment laden Project water being pumped to a roadside ditch through a filter bag. Water flows down the ditch, enters a culvert and crosses the road then flows into a watercourse outside of the ROW. The stream feature was visibly turbid downstream of this crossing (approximately up to 650 m downstream) when observed from the air.
- Shoofly 25C road (roughly KP240+820, WC270, WL-11537) – When tracing pumping from ROW it was noted that water was being discharged through a filter bag. From the filter bag the water flows back to the roads ditch line, flows along the ditch for approximately 55 m and then reaches a fish bearing stream outside of the ROW along the road. There are also possible inputs from road use in this location as the traffic over the previously existing culvert crossing inputs sediment into the channel.



Photo 4. Sediment laden Project water observed approximately 650 m downstream of KP234+500 as see from the air October 15, 2021.

- From the air, sediment laden Project water was observed to leave the right of way and reach the Clore River in the following 5 locations (approximate KPs):
 - 601+200;
 - 603+400;
 - 603+800;
 - 604+600; and,
 - 604+820.
- From the air, sediment laden Project water was observed to leave the right of way and reach the lakes adjacent to the right of way in three separate locations between KP 586+600 to KP587+500.



Photo 5. Example of Project inputs into lakes between KP586+600 to 587+500 as seen from air.



Photo 6. Example of Project inputs into lakes between KP586+600 to 587+500 as seen from air.



Photo 7. Example of Project inputs into the Clore River as seen from air.

The observations by EAO C&E over the course of the inspection, and examples displayed above, provide evidence of non-compliance with EN2020-011 with regards to controlling the risk of sediment transport to Environmentally Sensitive Receptors by stabilizing exposed surface materials and subsoil during and after Project works where potential for erosion exists and maintaining erosion and sediment control measures during and after Project works to ensure they continue to function as intended.

On November 9, 2021 EAO C&E issued enforcement orders EN2021-003 and EN2021-004 (Appendix 9 & 10) to the Project for confirmed noncompliance with EN2020-011. EN2021-003 requires the Project to implement erosion and/or sediment control measures that prevent Project generated sediment laden water from watercourses and wetlands at specified locations in work package 2 of the Project. EN2021-004 requires the Project to implement erosion and/or sediment control measures that prevent Project generated sediment laden water from watercourses and wetlands at specified locations in work package 4 of the Project.

On November 19, 2021 the Certificate Holder responded to EAO C&E to provide information required under the Orders. In the responses the Certificate Holder confirmed that it has implemented erosion and/or sediment control measures required to prevent Project-generated sediment laden water from entering the watercourses and wetlands identified in the Orders. Additional attachments, including photo documentation and written confirmation of the erosion and sediment control work completed to rectify each site, were provided to confirm compliance with the Orders.

EAO C&E notes that the information provided for the site at KP232+900 states that the ESC issues identified were not resolved. The Certificate Holder informed EAO C&E that the road has been previously developed and is permitted to a different company. The Certificate Holder requires approval by the roads permit holder prior to conducting work on the road. In the response provided to EAO C&E the Certificate Holder states that *“Plans are being discussed with the road permit holder to address this location before freshet.”*

The site at KP 240+820 was mitigated by “*the implementation of a pump that was being dewatered to a location approved by our Environmental Inspector.*” Similar to the site at KP232+900, the Certificate Holder requires approval by the roads permit holder prior to conducting work on the road at KP240+820.

The information provided to EAO C&E in response to EN2021-003 and EN2021-004 confirms that further work is required to address each of the sites at KP232+900 and 240+820. Although the Certificate Holder is not the road use permit holder, the Project is the primary traffic associated with the sites at KP232+900 and 240+820. Some upgrade works, such as road brushing, has taken place at these roads by the Project to facilitate Project traffic. No other users are currently driving these roads as they end at the Project right of way. Impacts to environmental receptors, such as watercourses, from Project traffic is the responsibility of the Certificate Holder. If impacts to environmental receptors such as watercourses cannot be mitigated when travelling along these roads, and upgrades to the roads cannot be actioned by the Certificate Holder, alternative routes should be used to access the Projects work fronts to avoid the impacts to environmental receptors.

EAO C&E may inspect to determine if the above sites are compliant with the requirements of the Environmental Assessment Certificate.

Compliance Determination: Out - Order - Refer to Enforcement Summary, Referral to Administrative Penalty

Requirement 2: Environmental Assessment Act, 2018, Order Under Section 53(1) (Appendix 5)

EN2020-011, December 8, 2020

- 1) Control the risk of sediment transport to Environmentally Sensitive Receptors by implementing the following:
- Stabilize exposed surface material and subsoil during and after Project works where potential for erosion exists;
 - Plan and install erosion and sediment control measures before, during and after Project works; and,
- Maintain these measures during and after Project works to ensure they continue to function as intended.

Condition 26

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 25 and Appendix 2A of the Application. *See Appendix 3 for full Condition wording.*

Coastal GasLink Pipeline Project, Environmental Management Plan (Appendix 4)

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.

Findings:

Over the course of the inspection EAO C&E observed various instances where sediment laden Project water had left the right of way and transported to environmentally sensitive receptors (wetlands). The following are examples of locations where the release of sediment laden Project water into wetlands was observed:

- KP 187+119 (Ecologically and Socio-Economically Important Wetland (ESIW), WL-2126). Sediment laden Project water reached ESIW and rare plant site.



Photo 8. KP187+119. Sediment laden Project water reached wetland as a result of pumping activities.

- KP 229+700 (approximately). No wetland number assigned as this feature is outside of the Project boundary. Peculiar Creek, low chain side south of ROW. Trench being dewatered through a filter bag located approximately 12 m from a wetland off ROW. Sediment laden Project water observed to be entering into the wetland with a visible plume of sediment noted in the wetland.



Photo 9. KP229+700 (approximate), wetland with sediment laden Project water flowing into it from active pumping.

- KP 224+200 (ESIW, WL-11789) – Water from ESIW flowing into trench. Trench being dewatered using pumps. Pumped water through filter bag observed to be re-entering the wetland.
- KP600+050 (approximate) (WL-9116). From the air, sediment laden Project water was observed to leave the right of way and reach a wetland outside of the ROW.



Photo 10. Near KP 600+050. Sediment laden water leaving ROW and discharging to wetlands downslope.



Photo 11. Near KP 600+500. Sediment laden water leaving ROW and discharging to wetlands downslope.

The observations by EAO C&E over the course of the inspection, and examples displayed above, provide evidence of non-compliance with EN2020-011 with regards to controlling the risk of sediment transport to Environmentally Sensitive Receptors by stabilizing exposed surface materials and subsoil during and after Project works where potential for erosion exists and maintaining erosion and sediment control measures during and after Project works to ensure they continue to function as intended.

On November 9, 2021 EAO C&E issued enforcement orders EN2021-003 and EN2021-004 (Appendix 9 & 10) to the Project for confirmed noncompliance with EN2020-011. EN2021-003 requires the Project to implement erosion and/or sediment control measures that prevent Project generated sediment laden water from watercourses and wetlands at specified locations in work package 2 of the Project. EN2021-004 requires the Project to implement erosion and/or sediment control measures that prevent Project generated sediment laden water from watercourses and wetlands at specified locations in work package 4 of the Project.

On November 19, 2021 the Certificate Holder responded to EAO C&E to provide information required under the Orders. In the responses the Certificate Holder confirmed that it has implemented erosion and/or sediment control measures required to prevent Project-generated sediment laden water from entering the watercourses and wetlands identified in the Orders. Additional attachments, including photo documentation and written confirmation of the erosion and sediment control work completed to rectify each site, were provided to confirm compliance with the Orders.

Compliance Determination: Out - Order - Refer to Enforcement Summary, Referral to Administrative Penalty

Requirement 3: Environmental Assessment Act, 2002, Order Under Section 34(1) (Appendix 6)

EN2019-003, June 17, 2019

Pursuant to Section 34(1) of the Act, I order that the Certificate Holder, as of the date of this Order, and hereafter for the life of the Project, secure, dispose of, remove, or otherwise manage all wildlife attractants in a manner that

prevents the attraction of wildlife and/or access to attractants by wildlife, to the satisfaction of EAO Compliance and Enforcement.

Condition 26

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 25 and Appendix 2A of the Application. *See Appendix 3 for full Condition wording.*

Coastal GasLink Pipeline Project, Environmental Management Plan (Appendix 4)

Appendix C - Chemical and Waste Management Plan – Waste Disposal

- Each construction site will be equipped 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.

*Lists have been shortened from the original version.

Findings:

EAO C&E had the following observations at the following locations specific to non-hazardous waste management:

Sukunka Multi Use Site (MUS):

- Unsecured animal attractants with ravens accessing food waste in the back of SMJV pick-up truck and spreading throughout parking area.



Photo 12. Animal attractants stored in the back of a crew truck.

Headwall 7.5 Km laydown and warehouse (not within electric fence):

- Freezer with food stored inside.
- BBQ with signs of use on grill and grease in grease trap.
- Non wildlife proof recycle bin full with pop, juice, and beer cans.

- Open waste bins with food waste stored inside accessed by wildlife. Food waste on ground animals (possibly a fox) accessing food waste pulled out of open bin as tracks were observed in the area.



Photo 13. 7.5 km laydown. Food waste bin left open.



Photo 14. Example of the contents in the above bin.

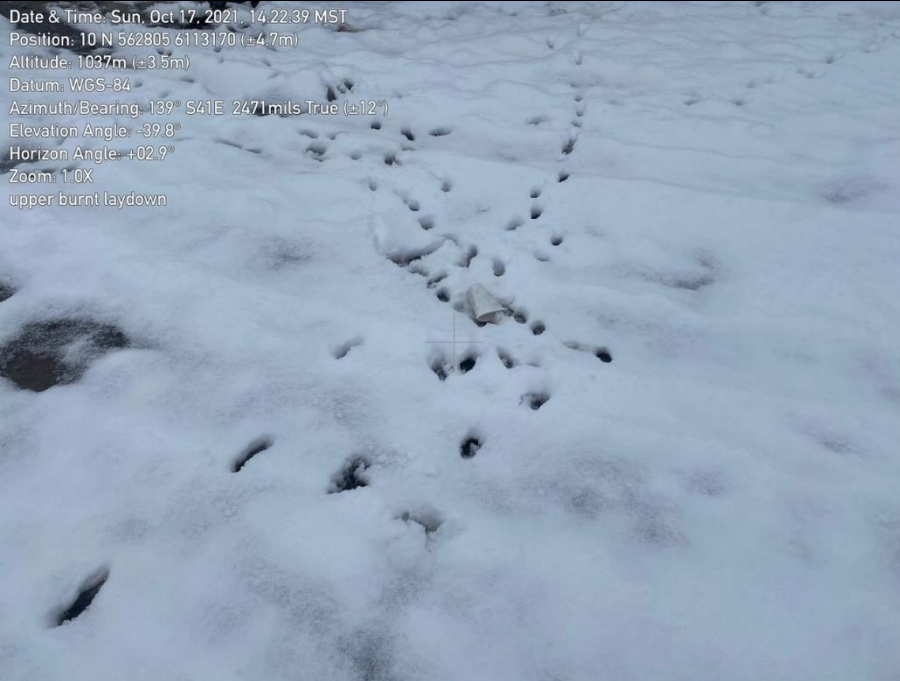


Photo 15. Wildlife tracks around food waste bins. Food waste on the ground.



Photo 16. Animal attractants stored in non wildlife proof bin.



Photo 17. BBQ stored in laydown, no electric fence around this laydown.

Parsnip MUS:

- Recycling and food waste found in the open top “wood only” bin.
- Construction waste, including food waste, stored in a pile directly on the ground. Evidence of birds picking at the food waste and birds observed in the nearby area.
- Animal attractants stored openly in the back of workers personal pick-up trucks parked at the MUS. Evidence that birds have accessed this food waste.



Photo 18. Waste, including animal attractants, stored in the back of a personal vehicle in the Parsnip parking area.



Photo 19. Mixed waste, including food waste, stored on the ground within Parsnip MUS. Signs that birds accessing this waste were observed while EAO C&E was on site.

7-Mile MUS – Maintenance / Laydown area (not within electric fence):

- Food waste stored in open top “metal only” bin.
- Food waste stored in non wildlife proof plastic garbage cans within laydown.
- Food waste stored in non wildlife proof plastic garbage cans at refuelling area of laydown.

- Large container holding general waste including food waste covered with a tarp and bungee cords – not wildlife proof. Evidence of birds accessing this waste.
- Plastic garbage can used to collect empty water bottles found to have food waste within.

7-mile MUS - parking area:

- Non wildlife proof bin labeled for bottles and cans stored in parking area. Bin also contained food waste within and is an animal attractant.

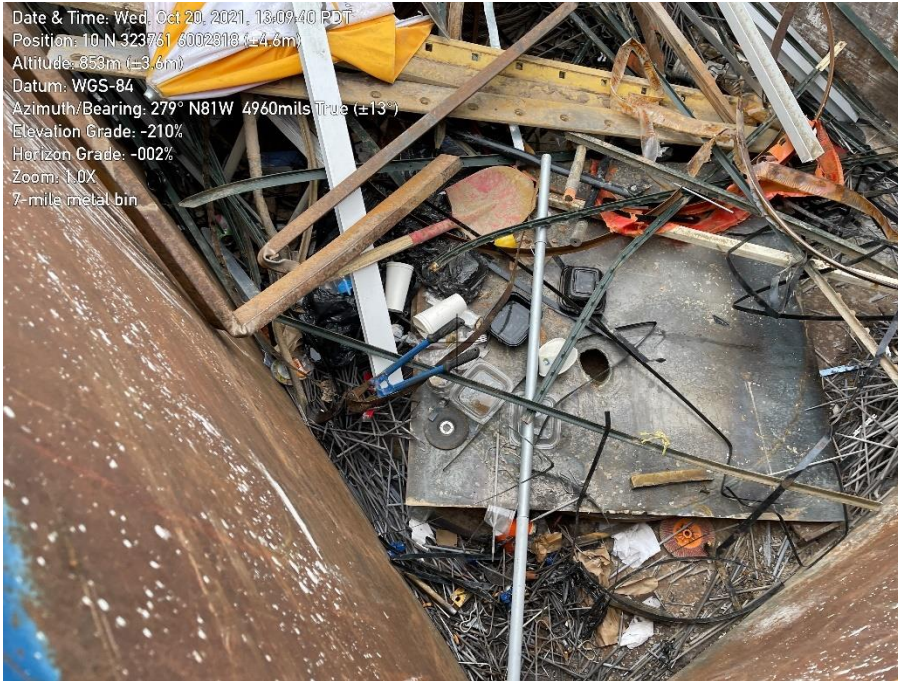


Photo 20. Bin labelled “Metal Only” found to have food waste stored within.



Photo 21. Non-wildlife proof bin at refueling area.



Photo 22. Non wildlife proof bin containing anthropogenic food waste.

MUS 9A:

- Food waste stored openly in the back of a crew truck, appeared to have been accessed by birds.
- One open top wooden box used to store waste, including food waste.

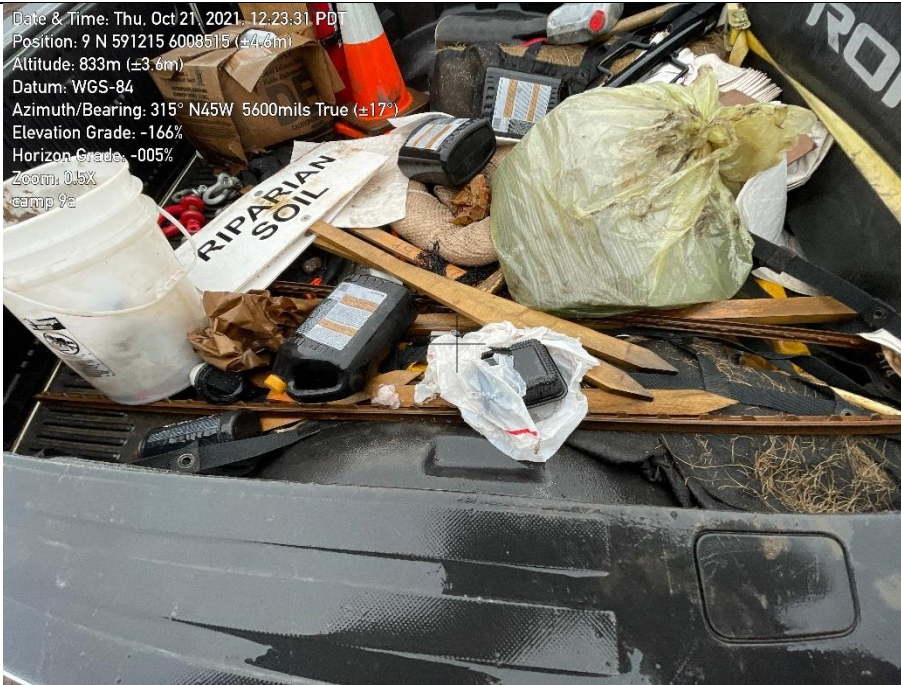


Photo 23. Food waste stored in the back of a crew truck. Signs that birds have been accessing this waste.



Photo 24. Non wildlife proof bin with food waste stored within.

The above observations provide evidence of non-compliance with the Environmental Management Plan and EAO C&E's June 17, 2019 Order, EN2019-003.

On November 9, 2021 EAO C&E issued enforcement order EN2021-002 (Appendix 8) to the Project for confirmed noncompliance with EN2019-003. EN2021-002 requires in part the following:

1. By November 19, 2021 provide the undersigned evidence that all Project staff and contractors have been advised that wildlife attractants must not be placed or stored in Project vehicles in a manner that is accessible to wildlife.
2. Remove all anthropogenic wildlife attractants at the laydown and warehouse facility located at approximately 7.5 km on the Upper Burnt FSR (approximate UTM 10N 562803m E 6113158m N) and do not store, stage, or otherwise locate any anthropogenic wildlife attractants at this location in a manner accessible to wildlife.
3. Remove all anthropogenic wildlife attractants at the project facility operated Pacific Atlantic Pipeline Construction Ltd (approximately UTM 10N 323751m E 6002802m N) and the private vehicle parking lot at the Seven Mile Camp (approximately UTM 10N 323982m E 6002955m N) and do not store, stage, or otherwise locate any anthropogenic wildlife attractants at these locations in a manner accessible to wildlife.
4. Submit to the undersigned by November 19, 2021 evidence that the wildlife attractants have been removed from the locations referenced as required by this Order.

On November 19, 2021 the Certificate Holder responded to EAO C&E to provide information required under the first three clauses of EN2021-002. In that response the Certificate Holder stated, in part:

In response to requirement 1, Coastal GasLink confirms that it has advised all Project personnel and contractors that wildlife attractants must not be placed or stored in Project vehicles in a manner that is accessible to wildlife. Further, Coastal GasLink confirms that it has issued a Project wide bulletin to all Project personnel and Prime Contractors outlining the Project requirements related to wildlife attractants. This bulletin is provided as Attachment 1: Coastal GasLink November 2021 Wildlife Bulletin. The Prime Contractors have all confirmed, through a request for information (RFI), that this bulletin has been shared with all personnel and wildlife attractants has been discussed in a morning safety meeting with all personnel. Confirmation of compliance from each Prime Contractor is provided in Table 1: Wildlife Attractant Confirmation of Compliance.

It appears that the Project has satisfied clauses 1 through 4 of EN2021-002.

Compliance Determination: Out - Order - Refer to Enforcement Summary

Requirement 4: Condition 26

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

Environmental Management Plan, Appendix D – Management Plans (Appendix 7)

Chemical and Waste Management Plan

D.1.4 Mitigation

All employees, contractors and consultants of Coastal GasLink will be required to comply with applicable regulations for the containment, handling, storage, use and disposal of wastes and chemicals.

General Measures

- Construction yards and staging areas that are designated as an industrial waste or chemical storage area will be selected and designed to:
 - provide safe storage areas, including secondary containment, for all chemical liquids and hazardous wastes in accordance with applicable regulatory requirements.

Findings:

EAO C&E observed practices regarding secondary containment over the course of the inspection. The observations included:

Sukunka MUS:

- Hydrocarbon containers (bulk containers) and other liquid chemical containers not stored in secondary containment.
- Jerry cans stored both without secondary containment and in secondary containment but on their sides.



Photo 25. Bulk containers, label indicates they contain diesel engine oil, without secondary containment at Sukunka MUS.



Photo 26. Jerry cans without secondary containment.

Parsnip MUS:

- No secondary containment for bulk chemical liquid products such as hydraulic oil, antifreeze and motor oil.



Photo 27. Bulk chemical liquids stored without secondary containment- Parsnip MUS.



Photo 28. Bulk chemical liquids stored without secondary containment – Parsnip MUS.

7-Mile MUS (Maintenance/ Laydown area):

- No secondary containment for bulk chemical liquid products such as hydraulic oil and motor oil.



Photo 29. Bulk chemical liquids stored without secondary containment- 7-mile laydown.

MUS 9A:

- No secondary containment beneath bulk chemical liquids.



Photo 30. Unlabelled bulk containers without secondary containment beneath.



Photo 31. Batteries stored directly on ground.

The above examples provide evidence of on compliance with the above reference requirement at the Sukunka MUS, Parsnip MUS, 7-Mile maintenance/laydown area, and MUS 9A.

On November 26, 2021 the Certificate Holder provided EAO C&E with a response to this inspection record (Appendix 11). In the response the Certificate Holder confirms that actions have been taken to resolve the findings identified above. Photo documentation and updates on specific locations were provided.

Compliance Determination: Out - Warning - Refer to Enforcement Summary

Requirement 5: Condition 26 of Schedule B

Environmental Management Plan – Appendix D

Chemical and Waste Management Plan – Waste and Chemical Storage

Secondary containment areas not protected from the elements will be monitored regularly to ensure that ice, snow, or rainwater have not decreased the volumetric capacity for storage of a spill to be less than 125% of the aggregate storage volume of the containment area. Water accumulated within a secondary containment structure may be removed if authorized by the Environmental Inspector. If there is visible hydrocarbon sheen, the water will be collected for proper storage and disposal.

Findings:

Throughout the inspection, EAO C&E inspected against the requirement to ensure that ice, snow, or rainwater have not decreased the volumetric capacity for storage of a spill to be less than 125% of the aggregate storage volume of the containment area. The following observations were made.

Right of Way:

- KP205+700. Pump in sump submerged in water. Containment not functional.
- KP224+500, WL-11789. Secondary containment beneath pump at capacity with water.
- KP223+578. Secondary containment for jerry cans, staged near an S4 feature, near capacity with water. Visible sheen on water.



Photo 32. KP205+700. Pump and containment submerged in water.



Photo 33. KP224+500. Secondary containment beneath pump at capacity with water.



Photo 34. KP223+578. Diesel jerry cans within secondary containment.

Parsnip MUS:

- Secondary containment beneath barrel containing methyl hydrate near capacity with rainwater.



Photo 35. Overview of storage area, near site offices. Note barrels without secondary containment in place (Requirement 4, above).



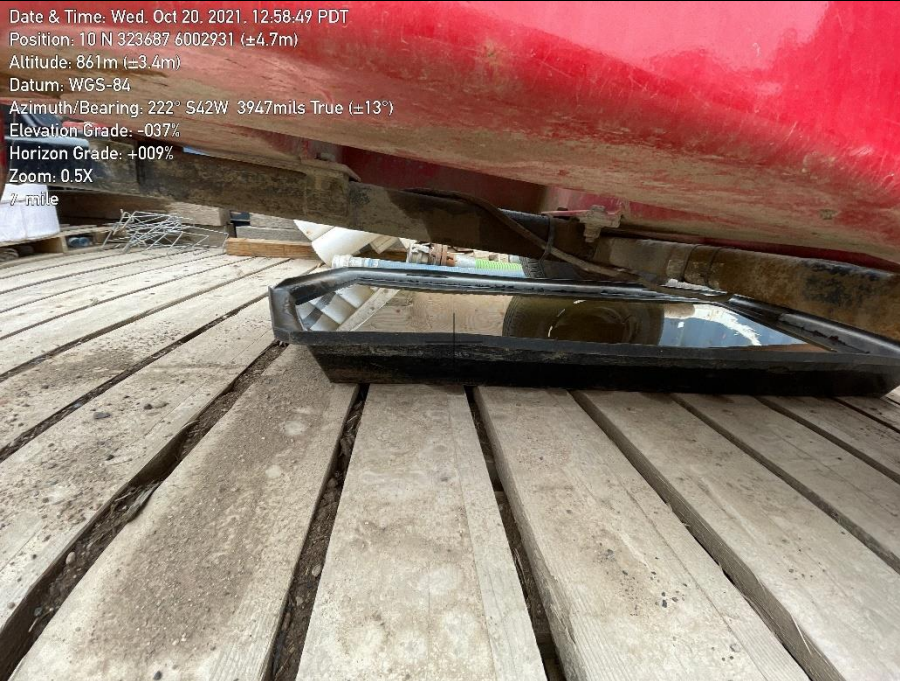
Photo 36. Close up of spill tray seen in photo above. Spill tray near capacity with rainwater.

7-Mile MUS (Maintenance/ Laydown area):

- Secondary containment beneath light plants and pumps at or near capacity with water.



Photo 37. Secondary containment on angle and at capacity with water.

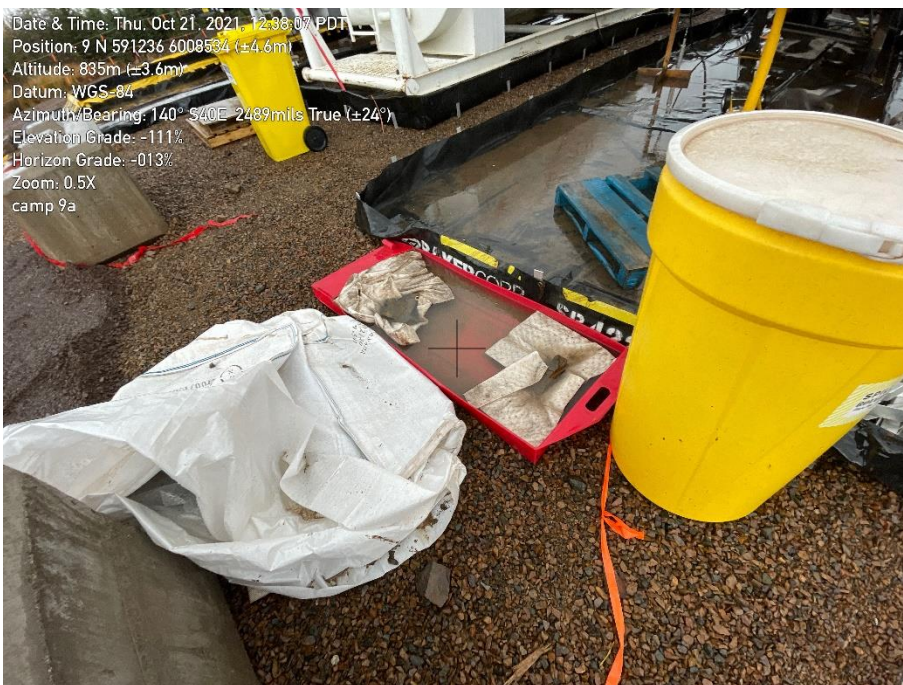


Date & Time: Wed, Oct 20, 2021, 12:58:49 PDT
Position: 10 N 323687 6002931 ($\pm 4.7m$)
Altitude: 861m ($\pm 3.4m$)
Datum: WGS-84
Azimuth/Bearing: 222° S42W 3947mils True ($\pm 13^\circ$)
Elevation Grade: -037%
Horizon Grade: +009%
Zoom: 0.5X
7-mile

Photo 38. Secondary containment beneath pump at capacity with water.

MUS 9A

- Containment beneath vehicle parking area at fuel island at or near capacity with water.



Date & Time: Thu, Oct 21, 2021, 12:36:09 PDT
Position: 9 N 591236 6008534 ($\pm 4.6m$)
Altitude: 835m ($\pm 3.6m$)
Datum: WGS-84
Azimuth/Bearing: 140° S40E 2489mils True ($\pm 24^\circ$)
Elevation Grade: -111%
Horizon Grade: -013%
Zoom: 0.5X
camp 9a

Photo 39. Secondary containment with used spill pads inside at capacity -MUS 9A.



Photo 40. Containment beneath vehicle parking area at fuel island near capacity – MUS 9A.

Sukunka Laydown 12:

- Wash station at laydown 12 has grating for vehicles to park on and catch/contain the wash water. Catchment beneath wash station is full of hydrocarbon laden water. Water was observed leaving the catchment area and discharging to the ground outside the wash station.

Date & Time: Sun, Oct 17, 2021, 12:28:33 MST
Position: 10 N 578999 6136099 (±6.7m)
Altitude: 699m (±11.7m)
Datum: WGS-84
Azimuth/Bearing: 237° S57W 4213mils True (±13°)
Elevation Angle: +04.7°
Horizon Angle: -00.2°
Zoom: 1.0X
laydown off burnt



Photo 41. Overview of wash station. Red circle indicates location where wash station is discharging hydrocarbon laden water to the environment.

Date & Time: Sun, Oct 17, 2021, 12:18:48 MST
Position: 10 N 578989 6136091 (±4.7m)
Altitude: 700m (±3.4m)
Datum: WGS-84
Azimuth/Bearing: 221° S41W 3929mils True (±13°)
Elevation Angle: -51.8°
Horizon Angle: +06.0°
Zoom: 1.0X
laydown off burnt



Photo 42. Close up of location in red circle in above photo where containment overtops.



Photo 43. Visible hydrocarbon sheen from the wash station in the surrounding environment.

The above examples provide evidence of on compliance with the above reference requirement.

On November 26, 2021 the Certificate Holder provided EAO C&E with a response to this inspection record (Appendix 11). In the response the Certificate Holder confirms that actions have been taken to resolve the findings identified above. Photo documentation and updates on specific locations were provided.

Compliance Determination: Out - Warning - Refer to Enforcement Summary

Requirement 6: Condition 26 of Schedule B

Environmental Management Plan – Appendix D

Human-Wildlife Conflict Management Plan – Table 4-1: Human-Wildlife Conflict Mitigation

Enclose camps with electric fencing to deter access to camps by bears.

Findings:

During the inspection, EAO C&E checked the functionality of the electric fencing around each of the following multi-use site locations and determined that the sites were compliant with the requirement to enclose the camps with electric fencing to deter access to the camps by bears:

- Sukunka MUS;
- Parsnip MUS;
- 7-Mile MUS; and,
- MUS 9A.

When inspecting the electric fence at the Headwall MUS the electric fence was found to be on and functional. However, EAO C&E noted that three out of the four man-gates around the MUS were secured closed using bungy

ords (see below photo for example). The man-gates are not protected by the electric fence and are not secured closed in a way to deter access by wildlife, such as bears, using bungy cords.

EAO C&E notes that a wildlife monitor is staged at the main vehicle gate of the Headwall MUS. The location of where this individual is staged is such that they cannot see two of the three man-gates that are being secured closed with bungy cords. Wildlife entering, or attempting to enter, the MUS through two of the man-gates may not be seen by the wildlife monitor.



Photo 44. Example of man-gate secured closed using bungy cord – Headwall MUS.

The Project is not compliant with the requirement to enclose camps with electric fencing to deter access to camps by bears at the Headwall MUS.

On November 26, 2021 the Certificate Holder provided EAO C&E with a response to this inspection record (Appendix 11). In the response the Certificate Holder confirms that the bungy cords have been removed from the man-gates and replaced with latches to properly secure the gates.

Compliance Determination: Out - Warning - Refer to Enforcement Summary

Requirement 7: Condition 26 of Schedule B

Environmental Management Plan

Section 8.1 General Environmental Protection Measures

Section 8.1.3 Specific Measures

Equipment Refuelling and Servicing

The contractor will ensure equipment is well-maintained and free of fluid leaks.

Findings:

During inspection of the Parsnip MUS, EAO C&E observed a spill to ground beneath a generator located near the employee parking area. See below photos.



Photo 45. Leak to ground beneath active generator at Parsnip MUS.



Photo 46. Close-up of an active leak to ground beneath an active generator at the Parsnip MUS.

The observations above provide evidence of non-compliance with the above referenced requirement.

On November 26, 2021 the Certificate Holder provided EAO C&E with a response to this inspection record (Appendix 11). In the response the Certificate Holder confirms that the spill to ground at the Parsnip MUS has been cleaned up and repairs made to the generator to prevent further leaks.

Compliance Determination: Out - Notice of Non-Compliance

Actions Required by Certificate Holder & Additional Comments

None at this time.

Enforcement Summary

Coastal GasLink Pipeline Ltd. has been issued a Notice of Non-Compliance with Condition 26 of Schedule B regarding Requirement 7 above; ensuring equipment is well-maintained and free of fluid leaks.

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

- Requirement 4 above, providing secondary containment for all chemical liquids and hazardous wastes.
- Requirement 5 above, ensuring that ice, snow, or rainwater have not decreased the volumetric capacity for storage of a spill to be less than 125% of the containment area.
- Requirement 6 above, enclosing camps with electric fencing to deter access to camps by bears.

COASTAL GASLINK PIPELINE LTD. IS NOT COMPLIANT WITH ORDER NUMBER EN2020-011 REGARDING:

- Requirement 1 above, controlling the risk of sediment transport to Environmentally Sensitive Receptors (watercourses).
- Requirement 2 above, controlling the risk of sediment transport to Environmentally Sensitive Receptors (wetlands).

COASTAL GASLINK PIPELINE LTD. IS NOT COMPLIANT WITH ORDER NUMBER EN2019-003 REGARDING:

- Requirement 3 above, securing, disposing, removing, or otherwise managing all wildlife attractants.


SEE APPENDIX 8, 9 AND 10 FOR ORDERS ISSUED UNDER SECTION 53 OF THE ENVIRONMENTAL ASSESSMENT ACT.

COASTAL GASLINK PIPELINE LTD. IS NOTIFIED THAT IN RESPONSE TO ONGOING NONCOMPLIANCE WITH EN2020-011 EAO C&E WILL BE RECOMMENDING AN ADMINISTRATIVE PENALTY TO A DECISION MAKER PURSUANT TO SECTION 60 OF THE ENVIRONMENTAL ASSESSMENT ACT. COASTAL GASLINK PIPELINE LTD. WILL BE CONTACTED WITH ADDITIONAL INFORMATION REGARDING THE ADMINISTRATIVE PENALTY PROCESS.

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	
 Clayton Smith Senior Compliance & Enforcement Officer	Date Sent to Certificate Holder for Opportunity to Respond 2021-11-09
	Date Finalized 2021-12-06
Appendices	
Appendix 1: Environmental Assessment Certificate # E14-03 Appendix 2: Schedule A Appendix 3: Schedule B Appendix 4: CGL_EMP_2018 Appendix 5: EN2020-011_Coastal GasLink_2020-12-08) Section_53_Order_ESC Appendix 6: EN2019-003 Coastal GasLink Section 34 Order – Attractants Appendix 7: CGL_EMP Appendix D_Management Plans_2018 Appendix 8: EN2021-002_Coastal_GasLink_2021-11-09_Section_53_Order_Attractants Appendix 9: EN2021-003_Coastal_GasLink_2021-11-09_Section_53_Order_ESC Appendix 10: EN2021-004_Coastal_GasLink_2021-11-09_Section_53_Order_ESC Appendix 11: CGL4703-CGP-BCEAO-REG-LTR-4953_IR2021-027 OTR_26-Nov-21	
Environmental Assessment Office - Compliance & Enforcement Branch	
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