

Petition Letter – Spa Hills Compost Facility Contamination

July 30, 2025

To: Carol Danyluk, P. Eng. - Director, Environmental Management Act (EMA) Ministry of Environment and Climate Change Strategy
Email: EnvironmentalCompliance@gov.bc.ca; carol.danyluk@gov.bc.ca

CC:

Karlee Hall – Enforcement Officer, ECCC

Email: karlee.hall@gov.bc.ca

Peter Hicks (Enforcement Officer, ECCC

Email: peter.hicks@gov.bc.ca

Carrie Nugent - Director, Site Remediation Section (Contaminated Sites Regulation)

Email: carrie.nugent@gov.bc.ca

Kevin Haines – Senior Risk Assessment Officer (Kamloops)

Email: Kevin.Haines@gov.bc.ca

David Williams – MLA for Salmon Arm-Shuswap

Email: David.Williams.MLA@leg.bc.ca

Dean Trumbley – Director CSRD Area D

Email: dtrumbley@csrd.bc.ca

Subject: Request for Site Investigation, Groundwater Monitoring, and Contaminated Site Classification – Spa Hills Farm Inc. (OMRR Authorization 104962)

Dear Director,

We are writing to formally request regulatory intervention at Spa Hills Farm Inc. in accordance with the Environmental Management Act and Contaminated Sites Regulation. A recent inspection confirms unmitigated effluent discharges that pose risks to drinking water and the environment. We request immediate investigation, groundwater monitoring, and site classification actions.

We, the undersigned residents and concerned citizens of the Salmon Arm area, are writing in response to the July 16, 2025, Warning Letter (IR237307) issued to Spa Hills Farm Inc., located at 2223 Yankee Flats Road, Salmon Arm, BC. The inspection report documents serious and repeated contraventions of the Organic Matter Recycling Regulation (OMRR) and the Environmental Management Act (EMA), most notably the unauthorized discharge of effluent containing dangerously elevated nutrient levels to ground via an unlined ditch.

Water samples collected by Ministry staff on May 7, 2025, showed effluent concentrations of:

- **Ammonia:** 10,400 mg/L
- **Total Nitrogen:** 20,200 mg/L
- **BOD:** >13,000 mg/L
- **Phosphorus:** 319 mg/L

These values exceed BC Water Quality Guidelines for the protection of aquatic life by hundreds of times and clearly demonstrate that the effluent constitutes a waste capable of damaging the environment.

Critically, these concentrations also exceed both the Canadian Drinking Water Quality Guidelines and the BC Contaminated Sites Regulation (CSR) standards. The reported total nitrogen level of 20,200 mg/L is more than 2,000 times higher than Health Canada's drinking water guideline for nitrate-nitrogen (10 mg/L), and also far exceeds the CSR Schedule 3.2 potable groundwater standards for ammonia and nitrate. These values are indicative of a serious threat to groundwater quality. Given that the effluent was discharged directly to ground, these conditions very likely meet the definition of a contaminated site under the CSR, which includes any site where the concentration of a substance in groundwater exceeds the applicable Schedule 3.2 standards. These comparisons underscore the severity of the discharge and the risk posed to human and environmental health.

This is not the first time the facility has been cited. Non-compliance with section 26(2)(a) of OMRR—requiring impermeable surfacing to prevent leachate release—was also documented in March and September 2024. Despite prior warnings, the same violations were found again in 2025, strongly suggesting an ongoing and unmitigated release of contaminants to ground.

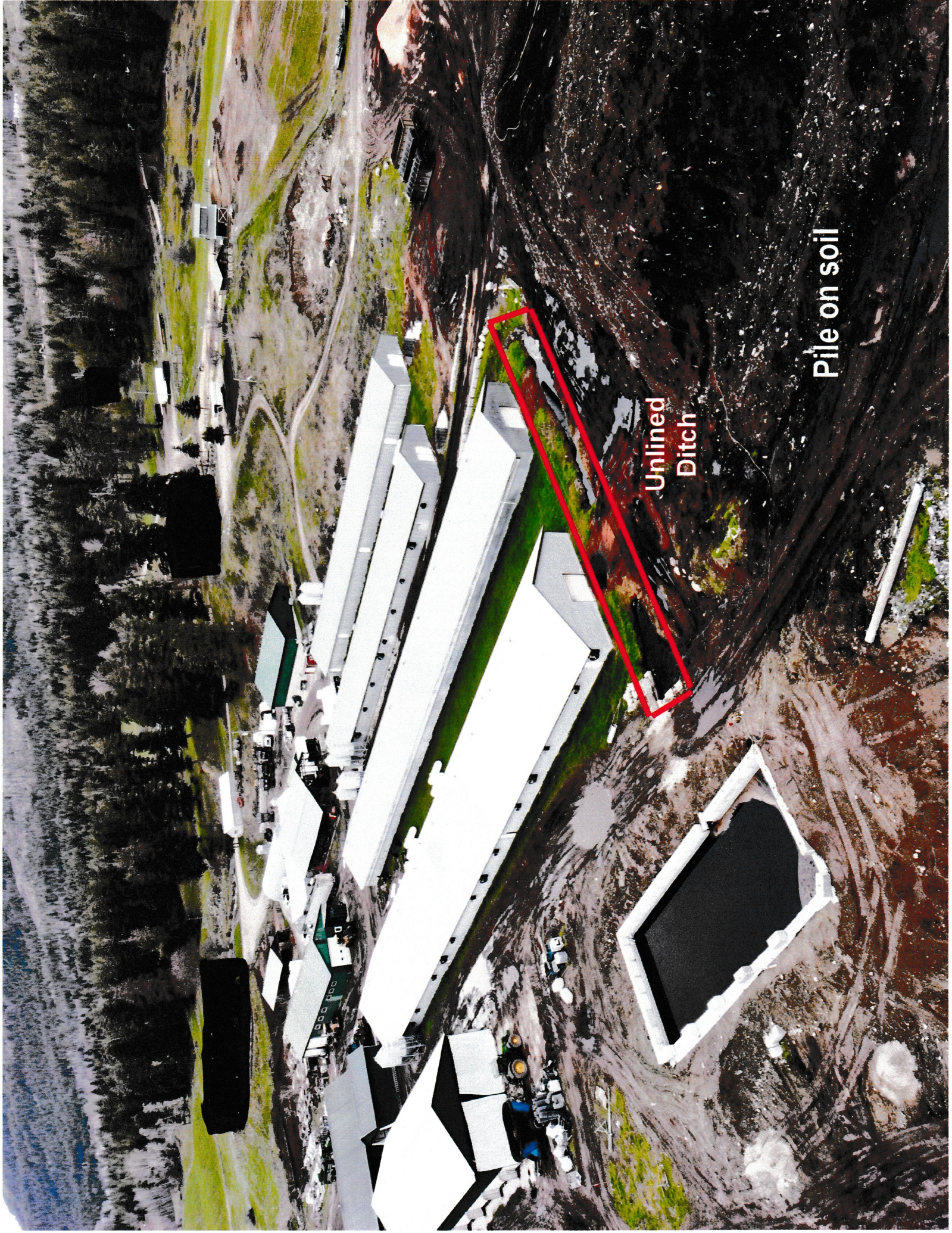
We are particularly concerned due to the presence of numerous domestic drinking water wells in the vicinity of the facility, as well as a known underground stream flowing along the property boundary. These sensitive receptors may already be impacted or are at significant risk of contamination if a subsurface plume of nitrogenous or organic contaminants is migrating downgradient—which, based on the uncontained discharge, is a likely scenario.

Given the evidence on file and the clear environmental risk, we respectfully request that the Ministry exercise its authority under the Environmental Management Act (EMA) and Contaminated Sites Regulation (CSR) to take the following actions:

1. Initiate a Preliminary Site Investigation (Stage 1 PSI) under **EMA s.81** to determine the extent and severity of the discharge.
2. Require the installation of groundwater monitoring wells, located downgradient of the compost storage and unlined ditch.
3. Direct the operator to engage a Qualified Professional to characterize any contaminant plume and assess the risk to drinking water and surface or subsurface flowpaths.
4. If contamination is confirmed, issue a Remediation Order under **EMA s.92** and classify the property as a contaminated site under the CSR.
5. Ensure the facility's Leachate Management Plan is amended and enforced to prevent future discharges.

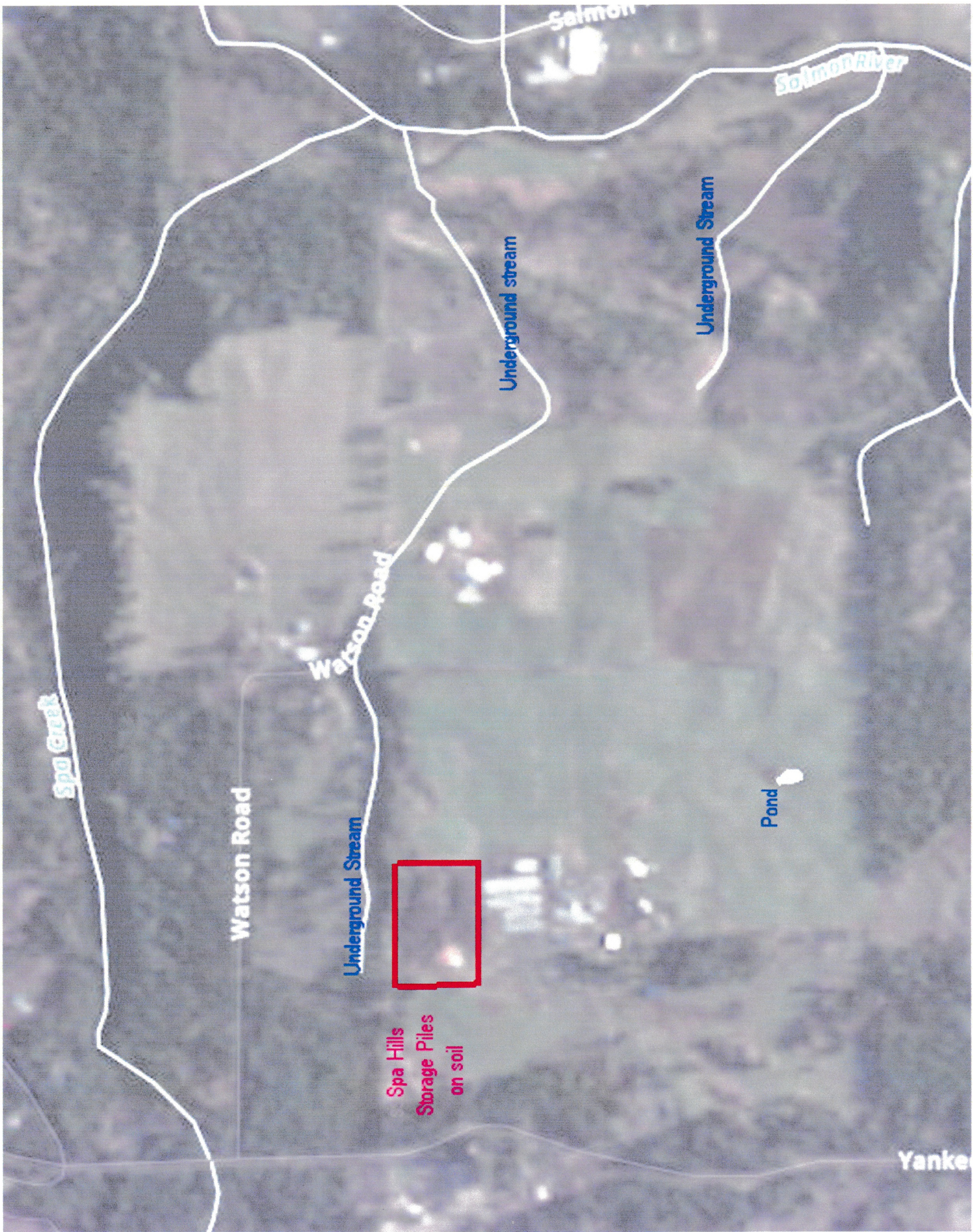
We are submitting this letter jointly to the Director of Compliance and Enforcement as well as the Director responsible for contaminated site identification. It is our position that the conditions documented at Spa Hills Farm Inc. strongly indicate the presence of a contaminated site as defined under the CSR.

We thank you for your attention to this urgent matter of public and environmental interest, and are available to provide additional information if needed.



Unlined
Ditch

Pile on soil



Spa Creek

Watson Road

Watson Road

Underground Stream

Underground stream

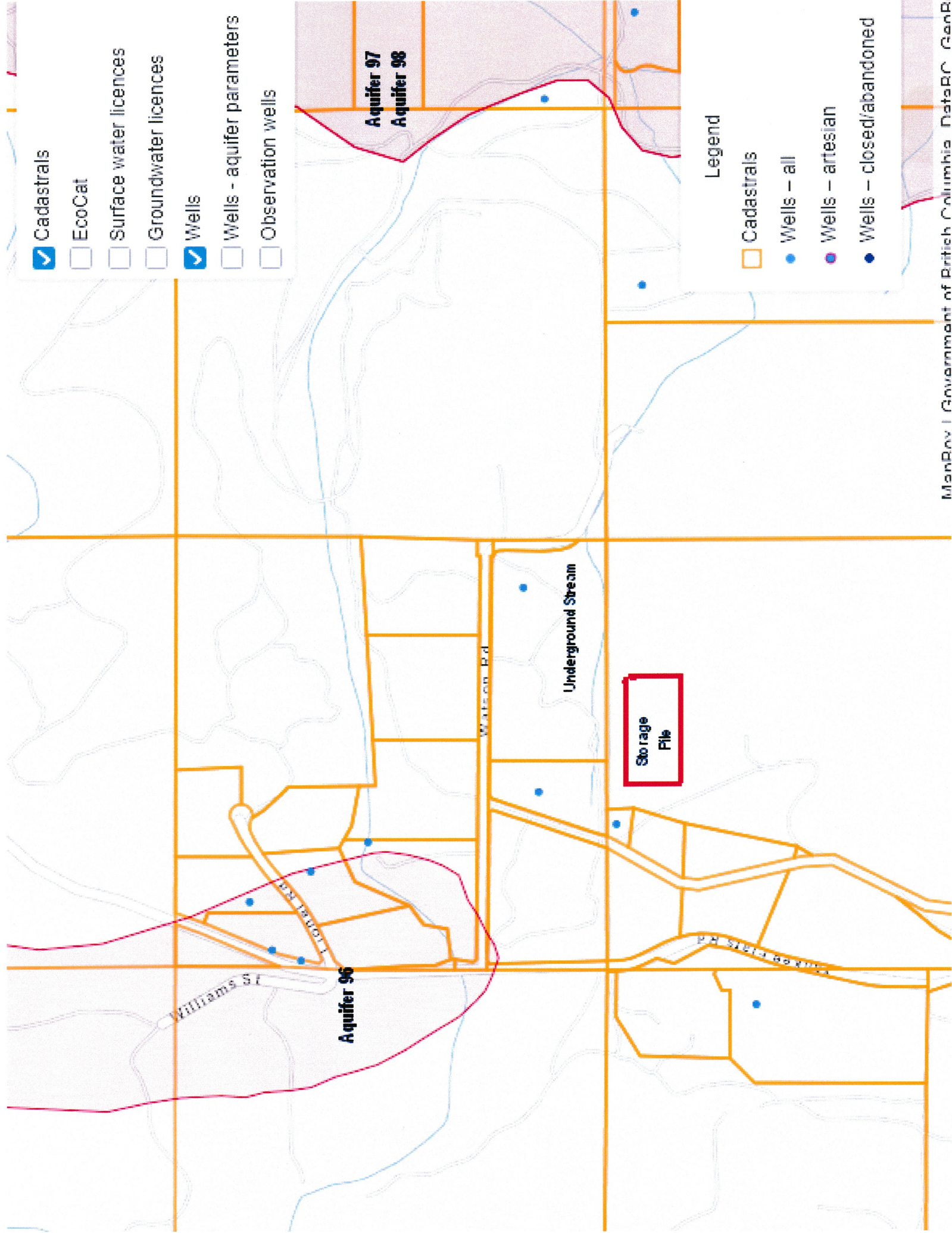
Underground Stream

Pond

Salmon River

Spa Hills
Storage Piles
on soil

Yankee



☒ Cadastrals

☐ EcoCat

☐ Surface water licences

☐ Groundwater licences

☒ Wells

☐ Wells - aquifer parameters

☐ Observation wells

Legend

Cadastrals

Wells - all

Wells - artesian

Wells - closed/abandoned

Aquifer 96

Aquifer 97
Aquifer 98

Underground Stream

Storage
File

Williams St

PR 10001

Watson Rd

Church Creek Rd