



October 17, 2024

Tracking Number: 405539
Authorization Number: 106060

REGISTERED MAIL

SUNSHINE COAST REGIONAL DISTRICT

1975 Field Road
Sechelt, BC V7Z 0A8

Dear Operational Certificate Holder:

Enclosed is Amended Operational Certificate 106060 issued under the provisions of the *Environmental Management Act*. Your attention is respectfully directed to the terms and conditions outlined in the Operational Certificate. An annual fee will be determined according to the Permit and Approval Fees and Charges Regulation.

This Operational Certificate does not authorize entry upon, crossing over, or use for any purpose of private or Crown lands or works, unless and except as authorized by the owner of such lands or works. The responsibility for obtaining such authority rests with the Operational Certificate holder. It is also the responsibility of the Operational Certificate holder to ensure that all activities conducted under this authorization are carried out with regard to the rights of third parties and comply with other applicable legislation that may be in force.

Information and guidance related to the Operational Certificate including regarding the *Environmental Management Act*, regulations, waste discharge authorizations, landfills, Landfill Criteria, environmental monitoring, sampling procedures, analytical procedures, compliance with a waste discharge authorization, routine reporting, non-compliance notification, and non-compliance reporting, etc., is available on the Ministry web page.

When a spill or the risk of a spill occurs, the responsible person (spiller) must report it immediately by calling 1-800-663-3456 in accordance with the Spill Reporting Regulation.

Pursuant to Section 16 of the *Environmental Management Act*, the Director has amended authorization 106060. This decision may be appealed to the Environmental Appeal Board in accordance with Part 8 of the *Environmental Management Act*. An appeal must be delivered within 30 days from the date that notice of this decision is given. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

Administration of this authorization will be carried out by staff from the Environmental Protection Division's Authorizations and Remediation Branch. Plans, data and reports pertinent to the Operational Certificate are to be submitted by email or electronic transfer to the Director, designated Officer, or as further instructed.

Please be reminded that the Director may, for the protection of the environment in accordance with Section 16 of the *Environmental Management Act*, require the Operational Certificate holder to do one or more of the following at any time:

- repair, alter, remove, improve or add to existing works, or construct new works, and submit plans and specifications for works specified in this authorization.
- conduct monitoring, and may specify procedures for monitoring and analysis, and procedures or requirements respecting the handling, treatment, transportation, discharge or storage of waste.
- provide security in the amount and form, and subject to the conditions, specified by the Director.
- conduct studies and report information in accordance with the specifications of the Director.
- recycle certain wastes and recover certain reusable resources, including energy potential from wastes, in accordance with the specifications of the Director.

- submit copies of reports and notifications to specified Indigenous Groups, within specified timelines, in accordance with the specifications of the Director.

Yours truly,

A handwritten signature in cursive script, appearing to read "Devan Oldfield".

Devan Oldfield, P.Ag.
for Director, *Environmental Management Act*
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**MINISTRY OF
ENVIRONMENT AND
CLIMATE CHANGE STRATEGY**

OPERATIONAL CERTIFICATE

106060

Under the Provisions of the Environmental Management Act

Pursuant to the Approved Sunshine Coast Regional District

Solid Waste Management Plan

SUNSHINE COAST REGIONAL DISTRICT

**1975 Field Road
Sechelt, BC V7Z 0A8**

Is Authorized to manage waste and recyclable material from the Sunshine Coast Regional District and environs at the Sechelt Landfill located at 4901 Dusty Road, Sechelt, British Columbia, provided that the Operational Certificate holder complies with all provisions of this Operational Certificate.

Unless a contrary intention appears, the provisions of this Operational Certificate are requirements that must be complied with regardless of whether the Operational Certificate holder introduces waste to the environment. Contravention of any of these requirements, and any discharge of waste while out of compliance with any provisions of this Operational Certificate, is a violation of the *Environmental Management Act*, and may lead to prosecution.

This Operational Certificate supersedes and replaces all previous versions of Operational Certificate 106060 issued under Section 28 of the *Environmental Management Act*.

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for Director, *Environmental Management Act*
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GLOSSARY

Capitalized terms referred to in this Authorization are defined in the Glossary below. Other terms used in this Authorization have the same meaning as those defined in the *Environmental Management Act*, applicable regulations, and the Landfill Criteria.

“Attractant” means food or food waste, compost, carcass or part of an animal, fish, or other meat, or other waste or garbage, that could attract bears, birds, rodents, insects, vectors or wildlife, but does not include grass, leaves, weeds, branches and wood waste;

“Electric Enclosure” means a bear-proof electric fence and electric gate(s), that surround the enclosed area;

“Facility” means the Sechelt landfill including all facilities and works on the Facility Site including the Landfill, Stormwater Management Works, Contact Water Pond, Contact Water Infiltration Pond and Facility Entrance;

“Facility Entrance” means the authorized works in section 1.5.1 of this Operational Certificate;

“Facility Site” means the location of the Facility in section 1.6.1 of this Operational Certificate;

“Facility Site Boundary” means the perimeter boundary of the Facility Site;

“Fugitive Emissions” means the release of air contaminants from sources other than the authorized point of discharge that occur during normal operations at the Facility, such as leakage from

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works or the release of particulates such as dust, but does not include spills to the environment as defined in the Spill Reporting Regulation or the release of air contaminants as a result of the failure of any works at the Facility;

“Landfill” means the authorized works in section 1.1.4 of this Operational Certificate;

“Leachate” means any liquid and suspended materials which it contains, that has percolated through or drained from waste;

“Landfill Criteria” means the LANDFILL CRITERIA FOR MUNICIPAL SOLID WASTE Second Edition June 2016.

“Province” means His Majesty the King in right of British Columbia;

“Qualified Professional” means an applied scientist or technologist specializing in an applied science or technology applicable to the duty or function, including, if applicable and without limiting this, agrology, biology, chemistry, engineering, geology or hydrogeology and who:

- a) is registered with the appropriate professional organization, is acting under that organization's code of ethics and is subject to disciplinary action by that organization, and,
- b) through suitable education, experience, accreditation and/or knowledge, may be reasonably relied on to provide advice within their area of expertise.

“Regulatory Document” means any document that the Operational Certificate holder is required to cause to be prepared, prepare or submit to the Director or the Province, pursuant to: (i) this authorization; (ii) any regulation made under the *Environmental Management Act* that regulates the Facility described in this authorization or the discharge of waste from that Facility; or (iii)

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any order issued under the *Environmental Management Act* directed against the Operational Certificate holder that is related to the Facility described in this authorization or the discharge of waste from that Facility;

“Soil” means soil in which the concentration of all substances is less than the lowest applicable industrial land use standard referred to in section 41(1)(a) of the Contaminated Sites Regulation;

“Stormwater” means runoff from rainfall and snow melt but does not include leachate.

“Stormwater Management Works” means the authorized works in section 1.5.3 of this Operational Certificate.

1. **AUTHORIZED DISCHARGES**

1.1 **Landfill**

This section applies to the discharge of waste to the landfill footprint. The site reference number for this discharge is E208123.

1.1.1 The maximum rate of waste discharge to the active landfill footprint is

- a) 16500 tonnes per calendar year of the waste in section 1.1.2(a) and 1.1.2 (b) of this Operational Certificate,
- b) not determined for Soil
- c) as specified by the Director for waste pursuant to section 1.1.2(d) of this Operational Certificate.

1.1.2 The characteristics of the waste discharge to the active landfill footprint must be:

- a) Municipal Solid Waste,

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- b) Dead animals including roadkill, domestic pets, wildlife, and mortalities that cannot be disposed of in accordance with the Code of Practice for Agricultural Environmental Management,
- c) Soil,
- d) Waste as authorized by the Director,
- e) Waste asbestos as per Section 40 of the Hazardous Waste Regulation under the *Environmental Management Act*.

but does not include:

- f) hazardous waste except to the extent expressly authorized pursuant to the *Environmental Management Act* section 7(2), as authorized pursuant to the Hazardous Waste Regulation, and,
- g) waste and recyclable material prohibited by the Director.

1.1.3 The waste discharge is authorized to the landfill footprint of the Landfill approximately located as shown on Site Plans A and B.

1.1.4 The authorized works associated with this discharge are a landfill footprint with a maximum area of 7.6 hectares, final cover and related appurtenances approximately located as shown on Site Plans A and B.

1.1.5 The Operational Certificate holder must ensure that the authorized works are complete and fully operational in accordance with the most recent Design, Operations and Closure Plan (DOCP).

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1.2 Leachate

This section applies to the discharge of leachate to the ground.
The site reference number for this discharge is E237091.

1.2.1 The maximum rate of leachate discharge is not determined.

1.2.2 The characteristics of the leachate discharge are typical of leachate from a municipal solid waste landfill.

1.2.3 Leachate from the Landfill is authorized to be discharged to the ground.

1.2.4 The authorized works associated with this discharge are, leachate pipes, Contact Water Retention Pond, Contact Water Infiltration Pond and related appurtenances approximately located as shown on Site Plans A and B.

1.2.5 The Operational Certificate holder must ensure that the authorized works are complete and fully operational in accordance with the most recent DOCP.

1.3 Landfill Gas

This section applies to the discharge of landfill gas to the air. The site reference number for this discharge is E335486.

1.3.1 The maximum discharge rate of landfill gas to the air from the landfill footprint is not determined.

1.3.2 The characteristics of the discharge are typical of landfill gas from a municipal solid waste landfill.

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- 1.3.3 Landfill gas is authorized to be discharged to the air through passive venting, landfill gas vents and as Fugitive Emissions.
- 1.3.4 The authorized works associated with this discharge are a sand collection layer that collects and directs the LFG towards the top of the landfill for natural venting, landfill gas vents, and related appurtenances approximately located as shown on Site Plans A and B.
- 1.3.5 The Operational Certificate holder must ensure that the authorized works are complete and fully operational in accordance with the most recent DOCP.

1.4 **Stormwater Management**

This section applies to the discharge of stormwater from the Facility. The site reference number for the discharge is E335487.

- 1.4.1 The maximum rate of Stormwater discharge is not determined.
- 1.4.2 The characteristics of the stormwater discharge from the facility are typical of stormwater from a municipal solid waste landfill. The stormwater must not include leachate.
- 1.4.3 The Stormwater is authorized to be discharged directly to the Dusty Road roadside ditch.
- 1.4.4 The authorized works are ditches, pipes, culverts and related appurtenances approximately located as shown on Site Plans A and B.

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1.4.5 The Operational Certificate holder must ensure that the authorized works are complete and fully operational in accordance with the most recent DOCP.

1.5 **Facility Entrance**

This section applies to the Facility Entrance.

1.5.1 The authorized works are sign(s), gates, perimeter fencing, weigh scale, scale office, waste drop off, diversion and storage facilities, and related appurtenances approximately located as shown on Site Plans A and B.

1.5.2 The Operational Certificate holder must ensure that the authorized works are complete and fully operational in accordance with the most recent Design Operations and Closure Plan (DOCP).

1.6 **Location of the Facility**

This section applies to the location of the Facility and the authorized discharges.

1.6.1 The location of the Facility and the authorized discharges is Block C, District Lot 7613, Group 1, New Westminster District.

2. **GENERAL REQUIREMENTS**

2.1 **Facility Maintenance**

The Operational Certificate holder must regularly inspect the Facility and maintain the Facility in good working order.

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2.2 General Provisions

Where this Authorization provides that the Director may require an action to be carried out, the Operational Certificate holder must carry out the action in accordance with the requirements of the Director.

2.3 Wildlife Nuisance

The Operational Certificate holder must prevent wildlife from accessing Attractants at the Facility. The Director may require the Operational Certificate holder to construct or modify works, including the electric enclosure, or follow specific operating instructions, if the Director is of the opinion that there is a possibility of a nuisance or hazard being caused by wildlife that is attracted to the Facility.

2.4 Additional Requirements

Subject to the provisions of the *Environmental Management Act* for amendments, the Director may require the Operational Certificate holder to:

- 2.4.1 Conduct studies and report information including additional, amended or improved plans, specifications, reports, studies and information, specified by the Director in the manner specified by the Director.
- 2.4.2 Implement actions in accordance with the Regulatory Documents and additional actions as specified.
- 2.4.3 Repair, alter, remove, improve or add to existing facilities and works, or construct new facilities and works, at the Facility, as specified.

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2.5 Waste Asbestos

Waste Asbestos is authorized for disposal subject to compliance with the requirements of section 40 of the Hazardous Waste Regulation and the following conditions:

- 2.5.1 The asbestos waste must not be mixed with any other waste.
- 2.5.2 All other applicable requirements of the Hazardous Waste Regulation, including but not limited to manifesting and waste record keeping must also be complied with.
- 2.5.3 The waste asbestos must be disposed of at the landfill by being immediately buried with a minimum of 0.5m of cover material as required under the Hazardous Waste Regulation.
- 2.5.4 A procedure for disposal of Asbestos must be included in the Design Operations and Closure Plan (DOCP).

3. OPERATING AND PERFORMANCE REQUIREMENTS

3.1 Design, Operations and Closure Plan (DOCP)

- 3.1.1 The current DOCP is the Design, Operations and Closure Plan, Sechelt Landfill, Sechelt BC dated July 4, 2023 (XCG File No. 4-2111-01-89), prepared by XCG Consulting Limited.
- 3.1.2 The Operational Certificate holder must implement the most recent DOCP and design, construct, operate, inspect, maintain, monitor, and close the Facility, in accordance with the most recent DOCP and this Operational Certificate.

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3.1.3 The Operational Certificate holder must cause a Qualified Professional to seal and submit an updated DOCP to the Director, as necessary to keep the DOCP up to date and at least once every five years thereafter.

3.1.4 The updated DOCP must include the information listed in the Landfill Criteria Section 10.3 DESIGN, OPERATIONS AND CLOSURE PLAN.

3.2 **Construction Report(s)**

3.2.1 The Operational Certificate holder must cause a Qualified Professional to seal construction report(s) on or before 90 days after the completion of construction of the Contact Water Retention Pond, Contact Water Infiltration Pond and Final Cover.

3.2.2 The construction report(s) must demonstrate that the works have been constructed in accordance with this Operational Certificate and the most recent DOCP, include record drawings of the constructed works, and the relevant inspection and testing reports and results, generally in accordance with the Landfill Criteria Section 10.2 CONSTRUCTION REPORT(S).

3.3 **Water Quality**

3.3.1 The Operational Certificate holder must cause a Qualified Professional to include the following information in the Annual Operations and Monitoring Report required by section 5.3 of this Operational Certificate:

- a) Rationale and determination of the applicable water use(s), and the corresponding water quality criteria, for

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stormwater, surface water and groundwater, at and beyond the Facility Site Boundary, considering relevant Ministry guidance, the water quality criteria listed in the Landfill Criteria Section 4.1 GROUNDWATER AND SURFACE WATER QUALITY.

- b) Comparison of the monitoring data with the water quality criteria, assessment, and determination as to whether the water quality criteria, at and beyond the Facility Site Boundary, determined under (a), were satisfied.
- c) If under (b), it was determined the water quality criteria, at and beyond the Facility Site Boundary, were not satisfied, a plan that includes rationale and implementation schedule to include:
 - (i) monitoring, reports, studies and/or information to determine the water quality effects from the Facility on the environment at and beyond the Facility Site Boundary, including whether pollution has occurred or is likely to occur,
 - (ii) actions to mitigate water quality effects from the Facility on the environment, and/or to satisfy the water quality criteria, at and beyond the Facility Site Boundary, and,
 - (iii) notification of affected neighbouring site owners.
- d) Implementation progress for the plan under (c) that was included in the preceding calendar year's Annual Operations and Monitoring Report.

3.3.2 If a plan is required by section 3.3.1(c), the Operational Certificate holder must implement the most recent plan.

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3.4 Landfill Gas Management

3.4.1 The Operational Certificate holder must cause a Qualified Professional to include the following information in the Annual Operations and Monitoring Report required by section 5.3 of this Operational Certificate:

- a) Rationale and determination of the applicable landfill gas management requirements considering relevant guidance in the Landfill Criteria Section 4.2 LANDFILL GAS MANAGEMENT.
- b) Comparison of the landfill gas management and monitoring data with the applicable landfill gas management requirements determined in (a), and determination as to whether such requirements were satisfied.
- c) If under (b), it was determined the landfill gas management requirements were not satisfied, a plan that includes rationale and implementation schedule to include:
 - (i) monitoring, reports, studies and/or information to determine the landfill gas effects from the Facility,
 - (ii) actions to mitigate landfill gas effects from the Facility and/or to satisfy the landfill gas management requirements, and,
 - (iii) notification of affected neighbouring site owners.

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d) Implementation progress for the plan under (c) that was included in the preceding calendar year's Annual Operations and Monitoring Report.

3.4.2 If a plan is required by section 3.4.1(c), the Operational Certificate holder must implement the most recent plan.

3.5 **Electric Enclosure**

3.5.1 The Operational Certificate holder must prevent bears from accessing Attractants at the Facility and from entering the Electric Enclosure.


3.5.2 The Operational Certificate holder must surround all Attractants that arrive at the Facility within an Electric Enclosure, immediately upon arrival of such Attractants at the Facility.

3.5.3 The Operational Certificate holder must ensure that the active landfill footprint is surrounded by an Electric Enclosure.

3.5.4 The Operational Certificate holder must ensure that the Electric Enclosure is fully operational at all times except during temporary short-term periods during daylight, for maintenance, safety or operational reasons, during which time the Facility must be continuously attended and other bear-proof measures must be carried out. If snow is present during the required operational period, any electrified strands above snow line must be isolated from the remainder of the system and energised.

3.5.5 The Operational Certificate holder must operate the Electric Enclosure with a minimum voltage of 6,000 volts. The Operational Certificate holder must inspect the entire

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perimeter of the Electric Enclosure once per month including for evidence of bear activity (e.g. diggings, scat, etc.) and damage, and measure the voltage of the Electric Enclosure at a minimum of one point along the Electric Enclosure each day the Facility is open. If any measurements show a voltage of less than 6,000 volts, the Operational Certificate holder must immediately investigate the cause of the low voltage (e.g. low battery, litter, vegetation, loose or crossed wires, broken insulators, breaks in the grounding system, etc.). The Operational Certificate holder must immediately correct any issues that affect operation of the Electric Enclosure in accordance with the requirements of this authorization.

- 3.5.6 The Operational Certificate holder must ensure that all electric gates are closed when the Facility is un-attended. The Operational Certificate holder may leave an electric gate open while the Facility is continuously attended provided the electric gate is checked periodically for bear activity.
- 3.5.7 The Operational Certificate holder must immediately report the presence of a bear within the Electric Enclosure, or any bear access to Attractants at the Facility, to the Conservation Officer Service, and immediately correct same.
- 3.5.8 The Operational Certificate holder must prepare documents that demonstrate compliance with the preceding sub-sections including inspection logs, bear activity at and/or near the Facility (e.g. sightings, diggings, scat, etc.), damage, voltage measurements, issues, causes, corrective actions, the presence of a bear within the Electric Enclosure, bear access to Attractants at the Facility, and reports to the Conservation Officer Service.

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4. **MONITORING AND SAMPLING REQUIREMENTS**

4.1 **Monitoring and Sampling Facilities**

The Operational Certificate holder must install and maintain, measurement, monitoring and sampling facilities for waste, leachate, stormwater, surface water, groundwater, and landfill gas, at specified locations, in accordance with the most recent DOCP.

4.2 **Monitoring and Sampling**

The Operational Certificate holder must carry out measurement, monitoring and sampling of waste, leachate, stormwater, surface water, groundwater, and landfill gas, for specified substances and at specified frequencies, in accordance with the most recent DOCP.

4.3 **Sampling Procedures**

The Operational Certificate holder must carry out sampling in accordance with the procedures described in the most recent edition of the "British Columbia Field Sampling Manual for Continuous Monitoring and the Collection of Air, Air-Emission, Water, Wastewater, Soil, Sediment, and Biological Samples, 2013 Edition (Permittee)" or by alternative procedures as authorized by the Director.

A copy of the above manual is available on the Ministry webpage.

4.4 **Analytical Procedures**

The Operational Certificate holder must carry out analyses in accordance with procedures described in the most recent edition

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of the "British Columbia Environmental Laboratory Manual" or by alternative procedures as authorized by the Director.

A copy of the above manual is available on the Ministry webpage.

4.5 **Quality Assurance**

The Operational Certificate holder must implement a Quality Assurance and Quality Control program in accordance with the Environmental Data Quality Assurance Regulation and guidance provided in the most recent edition of the "British Columbia Field Sampling Manual for Continuous Monitoring and the Collection of Air, Air-Emissions, Water, Wastewater, Soil, Sediment, and Biological Samples"

4.6 **Electronic Upload of Data to Ministry Database**

Without limiting any requirement under this Operational Certificate to report information to the Director, the Operational Certificate holder must upload the laboratory results and field measurements of all waste, leachate, surface water, groundwater and landfill gas monitoring programs required by this Operational Certificate to the ministry's environmental monitoring results database using the appropriate site identification numbers. The Operational Certificate holder must upload data to the database within 60 calendar days of the end of the month during which the samples were collected.

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5. **REPORTING REQUIREMENTS**

5.1 **Regulatory Documents**

- 5.1.1 The Operational Certificate holder must retain all Regulatory Documents for a period of at least 10 years after they are made.
- 5.1.2 If requested by a Director or an officer, the Operational Certificate holder must submit the requested Regulatory Documents to the Director or officer within 14 days of the request.

5.2 **Routine Reporting**

The Operational Certificate holder must submit all information required to be submitted under this Operational Certificate by email to EnvAuthorizationsReporting@gov.bc.ca or as otherwise instructed by the Director. For guidelines on how to properly name the files and email subject lines or for more information visit the Ministry website:

5.3 **Annual Operations and Monitoring Report**

- 5.3.1 The Operational Certificate holder must cause a Qualified Professional to seal and submit an Annual Operations and Monitoring Report, for the preceding calendar year, to the Director on or before March 31 of each year.
- 5.3.2 The Annual Operations and Monitoring Report must include the following information:
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- a) Tonnage discharged to the active landfill footprint of each of the categories of waste listed under section 1.1.1 of this Operational Certificate,
- b) Remaining volume and life of the landfill footprint.
- c) Summary of DOCP implementation,
- d) Summary of significant nuisances and complaints, relevant to this Operational Certificate, and actions implemented,
- e) Summary of information required by section 3.5.8 of this Operational Certificate,
- f) Summary of information submitted pursuant to section 5.4 Non-compliance Notification, and section 5.5 Non-compliance Reporting, of this Operational Certificate,
- g) For the next calendar year, summary of planned DOCP implementation,

Environmental Monitoring Report:

- h) Site plan(s), sampling locations, leachate, stormwater and surface water flow paths, groundwater elevations, gradients and flow directions,
- i) Measurement, monitoring and sampling facilities, locations, frequencies, substances, sampling and analytical procedures, quality assurance and quality control,
- j) Data interpretation including information such as trend analysis, graphs and diagrams, for measurement, monitoring and sampling results,
- k) Information required by section 3.3 Water Quality, of this Operational Certificate,
- l) Information required by section 3.4 Landfill Gas Management, of this Operational Certificate, and,
- m) Results, conclusions, recommendations and changes to the environmental monitoring plan.

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5.4 **Non-compliance Notification**

The Operational Certificate holder must immediately notify the Director by email at EnvironmentalCompliance@gov.bc.ca, or as otherwise instructed by the Director, of any non-compliance with the requirements of this Authorization and must immediately take remedial action to remedy any effects of such non-compliance.

5.5 **Non-compliance Reporting**

The Operational Certificate holder must, within 30 days of any non-compliance event, submit to the Director a written report that includes, but is not necessarily limited to, the following:

- a) all relevant test results obtained by the Operational Certificate holder related to the non-compliance,
- b) an explanation of the most probable cause(s) of the non-compliance, and,
- c) a description of remedial action planned and/or taken by the Operational Certificate holder to prevent similar non-compliance(s) in the future.

The Operational Certificate holder must submit all non-compliance reporting required to be submitted under this section by email to EnvironmentalCompliance@gov.bc.ca or as otherwise instructed by the Director. For guidelines on how to report a non-compliance or for more information visit the Ministry web page.

5.6 **Publication of Documents**

The Ministry of Environment and Climate Change Strategy publishes Regulatory Documents on its website for the purpose of research, public education and to provide transparency in the administration of environmental laws. The Operational Certificate

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holder acknowledges that the Province may publish any Regulatory Documents submitted by the Operational Certificate holder, excluding information that would be exempted from disclosure if the document was disclosed pursuant to a request under section 5 of the Freedom of Information and Protection of Privacy Act, and the Operational Certificate holder consents to such publication by the Province.

5.7 **Indigenous Nations Report Submission**

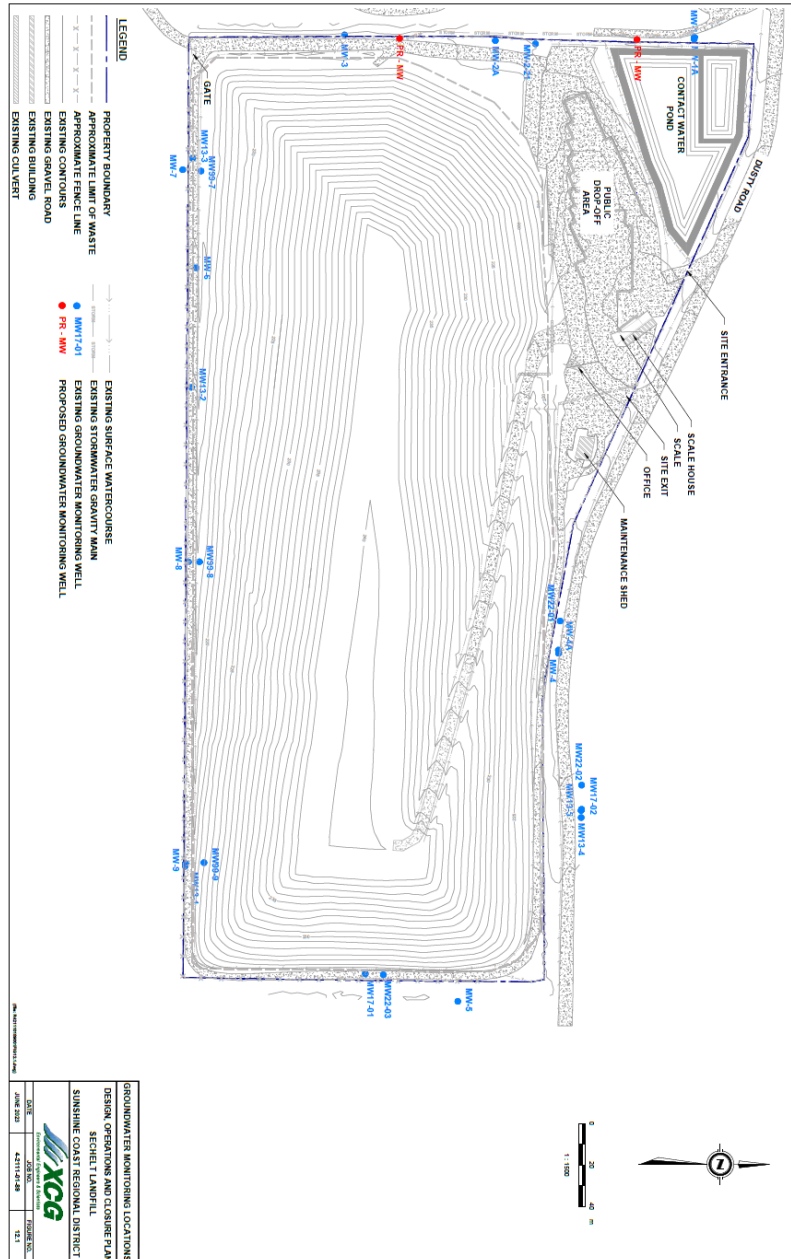
The Operational Certificate holder must submit copies of the Annual Report to the shíshálh Nation as per the deadlines for submission of the report to the Director.

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Site Plan A

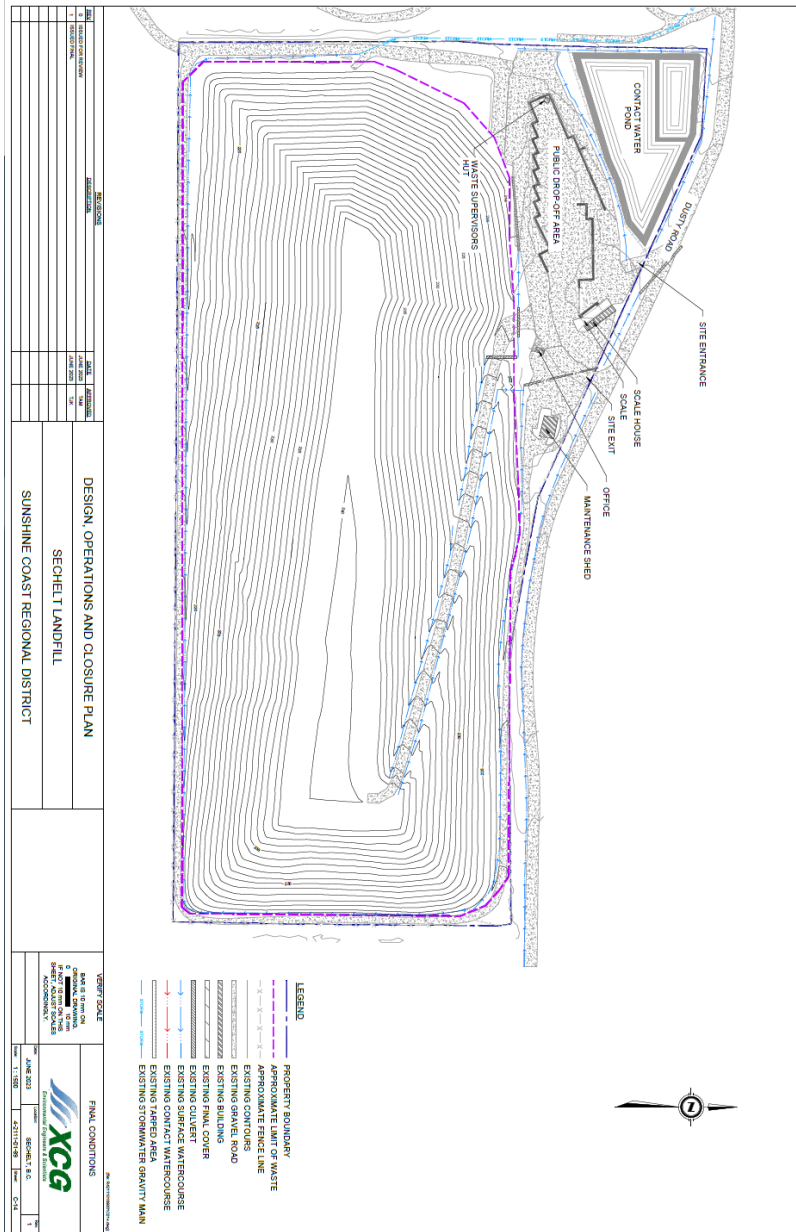


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Site Plan B



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