



Report Date: March 27th, 2024

File: 104962

Report Number: 219132

Spa Hills Farm Inc.  
2223 Yankee Flats Road,  
Salmon Arm, BC

Dear Spa Hills Farm Inc.,

### **Re: Non-compliance Advisory Letter**

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On January 3rd, 2024, Ministry of Environment and Climate Change Strategy (Ministry) Environmental Protection Officer Rebecca Benham (Ministry Staff) conducted an on-site inspection of the composting facility operated by Spa Hills Farm Inc. (Spa Hills), located at 2223 Yankee Flats Road Southwest, Salmon Arm, BC (Facility). The purpose of the inspection was to follow-up with complaints regarding the processing and storage of compost, as well as to verify compliance with the Organic Matter Recycling Regulation (OMRR), under which Spa Hills is registered with authorization 104962 (Authorization). The Authorization was first issued on June 29th, 2010, and last amended on February 2nd, 2016.

Present during the inspection were Josh Mitchell (Co-Owner, Spa Hills Farm Inc.) and Caleb Mitchell (Operator, Spa Hills Farm Inc.). Further supplementary information was provided via phone and email after the inspection from Josh Mitchell and De-Anna Mitchell (Co-Owner, Spa Hills Farm Inc.).

This Advisory, the alleged violations and the circumstances to which it refers will form part of the compliance history of Spa Hills Farm Inc., and will be taken into account in the event of future non-compliance.

Please note that this authorization is considered to be out of compliance until such a time as it can be confirmed to meet the authorization requirements.

### **Inspection Details:**

The inspection assessed compliance for the period from January 3rd, 2023 to February 5th, 2024 (Inspection Period) and included a review of the following documents:

- Email provided by Spa Hills Farm Inc. prepared by Josh Mitchell on January 29th, 2024 (Jan Information Response Email);
- Email provided by Spa Hills Farm Inc., prepared by Josh Mitchell on February 5th, 2024 (Feb Information Response Email);
- Temperature and Retention data from January 4th, 2022 to November 21st, 2023, prepared and provided by De-Anna Mitchell on January 29th, 2024 (2022-2023 Temperature Data);
- Spa Hills Farm Inc. 2022 Analytical Analysis, prepared by CARO Analytical Services on January 24th, 2023 (2022 Sample Results);
- Spa Hills Farm Inc. 2023 Analytical Analysis, prepared by CARO Analytical Services on December 19th, 2023 (2023 Sample Results) and;
- Spa Hills Composting Facility Operating Plan, prepared by J. Paul, Professional Agrologist on February 3rd, 2023 updated on January 22nd, 2024, provided by Josh Mitchell on January 24th, 2024 (2024 Operational Plan).

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**Ministry of Environment  
and Climate Change  
Strategy**

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# Compliance Assessment

Below are the requirements that were assessed for compliance during this inspection, as well as the associated details/findings and any actions required.

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

12 (3)(a): Compost that is not solely produced from yard waste or from untreated and unprocessed wood residuals and that meets the requirements of all of the following is Class A compost: (a) the requirements of subsection (2) (a) to (c);

## Details/Findings:

The feedstock for the Class A Compost produced at the Facility includes but is not limited to biosolids, red meat, food waste, brewery/winery waste and hatchery waste. Ministry Staff reviewed the 2022-2023 Temperature Data and determined that the Class A compost produced by the Facility met the requirements identified in Section 2 (a)(b)(c) for the inspection period.

During the on-site inspection, Ministry Staff observed six enclosed and confined vessels, involving mechanical aeration, of organic matter in which is considered Phase I. The Co-Owner informed Ministry Staff Phase I follows the Pathogen Reduction Processes as described in Schedule 1 of OMRR. As part of Phase I, the incoming organic waste is composted for a minimum of 10 days in one of the six aerated bunkers. Ministry Staff reviewed temperature data for all batches within the Inspection Period and determined all batches maintained temperature above 55 Celsius for more than 3 days.

Ministry Staff observed another six enclosed and confined vessels, involving mechanical aeration, of organic matter which is considered Phase 2. The Co-Owner informed Ministry Staff Phase II follows the Vector Attraction Reduction Processes as described in Schedule 2 of OMRR. As part of Phase II, the organic material is removed from the aerated bunker from Phase I and further composted for a minimum of 20 days in an aerated windrow. Ministry Staff reviewed the 2022-2023 Temperature Data and confirmed that the temperature of the compost was higher than 45 Celsius during Phase II during the Inspection Period.

A review of the 2022 and 2023 Sample Results determined that the finished compost met the requirements within Column 1 in Schedule 4 of OMRR during the Inspection Period.

## Compliance:

In

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

12 (3)(b): Compost that is not solely produced from yard waste or from untreated and unprocessed wood residuals and that meets the requirements of all of the following is Class A compost: (b) Schedule 3, Pathogen Reduction Limits;

## Details/Findings:

Ministry Staff reviewed the 2022 Sample Results and determined the compost produced by the Facility did not meet the testing and fecal requirements identified in Schedule 3, Pathogen Reduction limits for Class A compost, CARO sample number six had a total coliform reading of 31 000 MPN/g, which is an exceedance of 30 000 MPN/g of the allowable limit identified in Schedule 3 of OMRR.

Ministry Staff reviewed the 2023 Sample Results and determined the compost produced by the Facility in 2023 did meet the testing fecal requirements set out in Schedule 3, Pathogen Reduction limits for Class A compost.

## Compliance:

Out

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## Actions to be taken:

Compostable materials and recyclable materials continue to be a waste until dealt with in accordance with OMRR. Any compost that fails to meet Class A compost must be managed as a waste until it meets the requirements of OMRR Schedule 3, Pathogen Reduction Limits.

Ensure that any waste which fails to meet the requirements of the OMRR is either reprocessed or disposed of in accordance with the Environmental Management Act.

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

12 (3)(c): Compost that is not solely produced from yard waste or from untreated and unprocessed wood residuals and that meets the requirements of all of the following is Class A compost: (c) Schedule 5, Sampling and Analyses - Protocols and Frequency;

## Details/Findings:

Ministry Staff reviewed the Jan and Feb Information Response Email and determined that the Facility met the requirements of OMRR Schedule 5, Sampling and Analysis - Protocol and Frequency. Spa Hills carried out sampling and analyses at least once a year, meets the frequency requirement for this Inspection Period.

## Compliance:

In

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

12 (3)(d): Compost that is not solely produced from yard waste or from untreated and unprocessed wood residuals and that meets the requirements of all of the following is Class A compost: (d) Schedule 6, Record-keeping.

## Details/Findings:

A review of the Temperature and Retention Records, Sampling and Analysis Records confirms that Spa Hills is keeping the necessary records.

## Compliance:

In

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

12 (4): Class A compost must be derived only from organic matter.

## Details/Findings:

Spa Hills informed Ministry Staff that all the Class A compost is derived only from organic matter including but is not limited to biosolids, red meat, food waste, brewery/winery waste and hatchery waste.

## Compliance:

In

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

12 (5): Biosolids used as feedstock for the production of Class A compost must not exceed the standards for Class B biosolids set out in Column 3 of Schedule 4.

**Details/Findings:**

Spa Hills did not provide biosolids records for the biosolids that were used as feedstock throughout the Inspection Period, therefore compliance for this requirement was not able to be determined.

**Compliance:**

Not Determined

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

24 (1)(a): A discharger must have a qualified professional prepare plans and specifications for (a) the construction and operation of a new composting facility, or

**Details/Findings:**

Ministry Staff reviewed the 2024 Operational Plan and determined that a qualified professional prepared plans for the Facility. It should be noted that the construction of the Facility occurred outside of the Inspection Period, therefore, compliance with this requirement is not applicable for this Inspection Period.

**Compliance:**

Not Applicable

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

24 (1)(b): A discharger must have a qualified professional prepare plans and specifications for (b) any modification of an existing composting facility that results in an increase in the annual production capacity of more than 10 percent or more than 20 000 cubic metres.

**Details/Findings:**

As the Facility has not made any modification of the existing composting facility that resulted in an annual production capacity of more than 10 percent or more than 20 000 cubic metres, subsection 24 (1) (b) does not apply.

**Compliance:**

Not Applicable

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

24 (2)(a): The plans and specifications required by subsection (1) must include, but are not limited to, all of the following:  
(a) all works to be constructed on the site;

**Details/Findings:**

It should be noted that the construction of the Facility occurred outside the Inspection Period, therefore, compliance with this requirement is not applicable for this Inspection Period.

**Compliance:**

Not Applicable

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

24 (2)(b): The plans and specifications required by subsection (1) must include, but are not limited to, all of the following:  
(b) design capacity of the composting facility;

**Details/Findings:**

Ministry Staff reviewed the 2024 Operational Plan which lists, in Section 2, the design capacity of the Facility. The Facility is designed to process 12 000 tonnes of feedstock annually in an aerated composting process.

**Compliance:**

In

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

24 (2)(c): The plans and specifications required by subsection (1) must include, but are not limited to, all of the following: (c) a leachate management plan which stipulates how leachate generated from any and all stages of the composting process will be minimized, managed, treated or disposed;

**Details/Findings:**

Ministry Staff reviewed the 2024 Operational Plan and determined that a leachate management plan was included under Section 4.2. Within the 2024 Operational Plan it stipulated how leachate generated from the composting process will be minimized, managed and treated. It should be noted that the 2024 Operational Plan explains that "no leachate is anticipated during material storage as a result of considerable moisture loss during the active composting process." However, during the on-site inspection, Ministry Staff observed leachate surrounding these piles (Photo 2), with no management processes in place.

**Compliance:**

In

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

24 (2)(e): The plans and specifications required by subsection (1) must include, but are not limited to, all of the following:  
(e) an operating and closure plan for the composting facility.

## Details/Findings:

Ministry Staff reviewed the 2024 Operational Plan which describes in detail an operating plan for the Facility. A closure plan for the Facility is included in Section 4.10.

## Compliance:

In

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

24 (2)(d): The plans and specifications required by subsection (1) must include, but are not limited to, all of the following:  
(d) an odour management plan which stipulates how air contaminants from the composting facility will be discharged in a manner that does not cause pollution;

## Details/Findings:

In the 2024 Operational Plan, under Section 4.1, an odour management plan is included. This includes four main procedures carried out to mitigate odour;

- "Incoming material is mixed with bulking agent as soon as possible after delivery and placed in the aerated bins, hence odour in the receiving area will be minimal.
- The composting blend is be aerated immediately to maintain aerobic conditions in the composting material.
- The composting blend is covered with finished compost as an odour control layer.
- The composting material remains aerated inside the composting buildings at least 6 weeks, reducing the potential for anaerobic conditions resulting from excess moisture."

Spa Hills also ensures that the aerated composting process is carried out for at least six weeks to maintain a minimal odour nuisance, this was observed in the 2022-2023 Temperature Data.

## Compliance:

In

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

24 (3)(a)(i): The discharger must ensure that (a) the qualified professional (i) affixes his or her professional seal or signature, or both, to the plans and specifications for the composting facility, and

## Details/Findings:

Ministry Staff reviewed the 2024 Operational Plan and determined that the qualified professional J.Paul, PhD, Professional Agrologist affixed their name to the plans and specifications for the composting facility. However, this did not include a professional seal or signature.

## Compliance:

Out

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**Actions to be taken:**

Ensure a qualified professional includes their professional seal or signature to the plans and specifications.

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

24 (3)(a)(ii): The discharger must ensure that (a) the qualified professional (ii) makes a signed statement certifying that the composting facility has been constructed in accordance with the plans and specifications,

**Details/Findings:**

A review of all supplementary information provided did not include a signed statement from a qualified professional. Therefore, compliance with this Section could not be determined.

**Compliance:**

Out

**Actions to be taken:**

Ensure a qualified professional includes a signed statement certifying that the composting facility has been constructed in accordance with the plans and specifications.

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

24 (3)(b): The discharger must ensure that (b) a copy of the plans and specifications for the composting facility are kept at the composting facility at all times, and are available for inspection at any time,

**Details/Findings:**

Spa Hills provided a copy of the plans and specifications when requested and this is available at the facility at all times.

**Compliance:**

In

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

24 (3)(c): The discharger must ensure that (c) the plans and specifications are submitted to a director upon request, and

**Details/Findings:**

The Co-Owner provided the plans and specifications when requested.

**Compliance:**

In

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

24 (3)(d): The discharger must ensure that (d) the composting facility is operated in compliance with the plans and specifications required by subsection (1).

## Details/Findings:

During the on-site inspection, Ministry Staff did not observe any leachate control at the Facility's storage site. Spa Hills does not operate the composting facility in compliance with the leachate control plan as described in the 2024 Operational Plan and, therefore, is out of compliance for the requirement.

## Compliance:

Out

## Actions to be taken:

Ensure Spa Hills operates the composting facility in compliance with the plans and specifications required by subsection (1).

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

26 (2)(a): The receiving, storage, processing and curing areas of a composting facility must comply with all of the following: (a) be located on asphalt, concrete or another similar impermeable surface that is capable of withstanding wear and tear from normal operations and that will prevent the release of leachate into the environment;

## Details/Findings:

During the on-site inspection, Ministry Staff observed that the receiving, processing and curing areas of the composting facility were located on concrete to prevent the release of leachate into the environment (Photo 2). However, Ministry Staff observed that the storage area at the Facility was not located on an impermeable surface that is capable of withstanding wear and tear from normal operations and did not prevent the release of leachate into the environment.

## Compliance:

Out

## Actions to be taken:

Ensure that the receiving, storage, processing and curing areas are located on an impermeable surface that is capable of withstanding wear and tear from normal operations and that will prevent the release of leachate into the environment.

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## Requirement Description:

### Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)

26 (2)(b)(i): The receiving, storage, processing and curing areas of a composting facility must comply with all of the following: (b) have a roof or cover, or a prepared surface, designed to prevent (i) the surface collection of water around the base of organic matter and compost, and

## Details/Findings:

Ministry Staff observed that the receiving, processing and curing areas of the composting facility were covered and sloped to prevent water from collecting around the organic matter and compost. However, the storage area at the Facility was not covered or on a prepared surface. During the on-site inspection, Ministry Staff observed water collecting around the finished compost with no leachate control measures in place (Photo 1).

## Compliance:

Out

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## **Actions to be taken:**

Ensure Spa Hills has a roof, cover or a prepared surface designed to prevent the surface collection of water around the base of organic matter and compost within the storage area.

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## **Requirement Description:**

### **Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

26 (2)(b)(ii): The receiving, storage, processing and curing areas of a composting facility must comply with all of the following: (b) have a roof or cover, or a prepared surface, designed to prevent (ii) run-off water from entering the receiving, storage, processing and curing areas;

## **Details/Findings:**

Ministry Staff observed that the receiving, processing and curing areas of the composting facility were covered and on a prepared surface to prevent run-off from entering the areas. However, the storage area at the Facility was not covered or on a prepared surface. During the on-site inspection, Ministry Staff observed run-off entering the finished compost storage area (Photo 1).

## **Compliance:**

Out

## **Actions to be taken:**

Ensure Spa Hills has a roof, cover or a prepared surface designed to prevent run-off water from entering the storage area.

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## **Requirement Description:**

### **Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

26 (2)(c): The receiving, storage, processing and curing areas of a composting facility must comply with all of the following: (c) have a leachate collection system designed, constructed, maintained and operated to reuse leachate, or to remove leachate, from the receiving, storage, processing and curing areas.

## **Details/Findings:**

Spa Hills informed Ministry Staff that all composting and storage areas had a sloped surface. The receiving, processing and curing areas have a sloped area where drainage into a 4500L leachate collection system recycles the leachate back into the composting process (Photo 3). The Co-Owner showed Ministry Staff the operation of the leachate collection system.

During the on-site inspection, Ministry Staff did not observe any leachate collection system for the Facility's storage area.

## **Compliance:**

Out

## **Actions to be taken:**

Ensure Spa Hills has a leachate collection system designed to reuse or remove leachate from the storage area.

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

26 (3): Leachate that is not collected and reused in the composting process must not be discharged into the environment unless authorized under the Act.

**Details/Findings:**

The Facility has an impermeable surface, cover and a prepared leachate collection system for the Facility's processing, receiving and curing areas. However, in the storage area at the Facility, leachate that is not collected and reused is directly discharged to the ground (Photo 4).

**Compliance:**

Out

**Actions to be taken:**

Immediately cease the discharge of leachate into the environment and ensure that the storage area is managed in a way which prevents the discharge of leachate into the environment.

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

26 (4): Despite subsections (2) and (3), an impermeable surface, roof, cover, prepared surface or leachate collection system is not necessary if a qualified professional can demonstrate through an environmental impact assessment that the environment will be protected and appropriate water quality criteria satisfied through the use of alternative leachate management processes.

**Details/Findings:**

The qualified professional has not completed an environmental impact assessment for this site, therefore, compliance with this requirement is not applicable.

**Compliance:**

Not Applicable

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

27: The amount of organic matter in a composting facility must not at any time exceed the total design capacity of the facility.

**Details/Findings:**

The Co-Owner informed Ministry Staff that in 2022 Spa Hills produced 3325 tonnes of compost, and in 2023 Spa Hills produced 3500 tonnes of compost. The Facility's total design capacity is 12 000 tonnes of feedstock, however, Spa Hills did not provide incoming weights for the Inspection Period, therefore compliance for this requirement cannot be determined.

**Compliance:**

Not Determined

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

28: At least half of the compost stored at a composting facility must be removed annually from the facility beginning in the third year after facility start-up.

**Details/Findings:**

The Co-Owner informed Ministry Staff in the Information Response Email that at least 50% of the compost stored at the Facility is used annually in the agricultural operation that takes place at this site..

**Compliance:**

In

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

29 (1)(a): Residuals from the composting process must (a) be stored so as to prevent vector attraction, and

**Details/Findings:**

During the on-site inspection, Ministry Staff observed residuals from the composting operation out in the open and the Facility does not carry out any actions or measure to prevent vector attraction.

**Compliance:**

Out

**Actions to be taken:**

Ensure residuals from the composting process are stored in a manner that prevents vector attraction.

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

29 (1)(b): Residuals from the composting process must (b) be disposed of on a regular basis in accordance with the Act.

**Details/Findings:**

Ministry Staff were informed by the Co-Owner that any residual waste is sorted and is regularly taken offsite by a third party disposal service.

**Compliance:**

In

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**Requirement Description:****Environmental Management Act, Organic Matter Recycling Regulation (18/2002) (EMA)**

29 (2): Residuals that are stored at a composting facility must not at any time exceed 15 cubic metres in total.

**Details/Findings:**

During the on-site inspection, Ministry Staff observed residuals from the composting operation exceeding 15 cubic metres. This was also confirmed by the Co-Owner via phone call on February 28th, 2024.

**Compliance:**

Out

**Actions to be taken:**

Spa Hills must not exceed 15 cubic metres of residuals being stored on site.

Compliance History:  
**2021-02-16 IR 164695 Notice:**  
**2020-07-16 IR 145833 Notice:**  
**2019-06-26 IR 123745 Notice:**

The Ministry of Environment Compliance and Enforcement Policy and Procedure (C&E Policy) prescribes common requirements and procedures for all Ministry staff to ensure consistent and risk-based assessment and response to non-compliance. Using the Non-Compliance Decision Matrix, the compliance determination for this inspection has been assessed as **Level 2, Category A, Advisory**.

More information about Environmental Compliance, the Non-Compliance Decision Matrix, and reporting and data submission requirements can be found at the links below:

General compliance information:

[www.gov.bc.ca/environmentalcompliance](http://www.gov.bc.ca/environmentalcompliance)

Non-Compliance Decision Matrix information:

[www.gov.bc.ca/environment/how-compliance-is-assessed](http://www.gov.bc.ca/environment/how-compliance-is-assessed)

Reporting and data submission requirements (to be sent to [EnvAuthorizationsReporting@gov.bc.ca](mailto:EnvAuthorizationsReporting@gov.bc.ca)):

<https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/comply>

Please be advised that this inspection report may be published on the provincial government website within 7 days.

Below are attachments related to this inspection.

If you have any questions about this letter, please contact the undersigned.

Yours truly,

Rebecca Benham  
Environmental Protection Officer

**Attachments:**

- 1) Photo 1. Run-off water collecting around the compost pile at the storage site with no leachate control.
- 2) Photo 2. Composting facility located on concrete to prevent the release of leachate into the environment.
- 3) Photo 3. 4500L leachate collection system.
- 4) Photo 4. Leachate directly discharged to ground.

**Deliver via:**

Email:  Fax:  Mail:   
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**Ministry of Environment  
and Climate Change  
Strategy**

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**DISCLAIMER:**

Please note that sections of the permit, regulation or code of practice referenced in this inspection record are for guidance and are not the official version. Please refer to the original permit, regulation or code of practice.

To see the most up to date version of the regulations and codes of practices please visit  
<http://www.bclaws.ca>

If you require a copy of the original permit, please contact the inspector noted on this inspection record.

It is also important to note that this inspection record does not necessarily reflect each requirement or condition of the authorization therefore compliance is noted only for the requirements or conditions listed in the inspection record.



Photo 1. Run-off water collecting around the compost pile at the storage site with no leachate control.



Photo 2. Composting facility located on concrete to prevent the release of leachate into the environment.



Photo 3. 4500L leachate collection system.



Photo 4. Leachate directly discharged to ground.