



City of Richmond

Report to Committee

To: Public Works and Transportation Committee **Date:** October 25, 2018
From: John Irving
Director, Engineering **File:** 10-6160-08/2018-Vol
01
Re: **Non-Stormwater Discharge Process Improvements**

Staff Recommendation

1. That the Pollution Prevention and Cleanup Bylaw No. 8475, Amendment Bylaw No. 9950, which introduces the new Non-Stormwater Discharge Permit, standards, and application fee, be introduced and given first, second, and third readings; and
2. That the Consolidated Fees Bylaw No. 8636, Amendment Bylaw No. 9951, which quantifies the Non-stormwater Discharge application fee, be introduced and given first, second, and third readings.

John Irving
Director, Engineering
(604-276-4140)

REPORT CONCURRENCE		
ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER
Law	<input checked="" type="checkbox"/>	
Building Approvals	<input checked="" type="checkbox"/>	
REVIEWED BY STAFF REPORT / AGENDA REVIEW SUBCOMMITTEE	INITIALS: 	APPROVED BY CAO

Staff Report

Origin

Staff assessed the City's system of managing Non-Stormwater Discharge Agreements, regulated by the *Pollution Prevention and Clean-up Bylaw No. 8475*, and identified customer service and cost saving opportunities compared to the current system. This report summarizes the steps staff have taken to evaluate the current system and outlines proposed changes for Council consideration.

This report supports Council's 2014-2018 Term Goal #6 Quality Infrastructure Networks

Continue diligence towards the development of infrastructure networks that are safe, sustainable, and address the challenges associated with aging systems, population growth, and environmental impact.

6.1 Safe and sustainable infrastructure.

6.2. Infrastructure is reflective of and keeping pace with community need.

This report supports Council's 2014-2018 Term Goal #8 Support Economic Development

Review, develop and implement plans, policies, programs and practices to increase business and visitor appeal and promote local economic growth and resiliency

8.2 Opportunities for economic growth and development are enhanced.

Background

The City's stormwater system consists of open and closed drainage infrastructure that is designed to collect untreated surface water from impervious surfaces such as roads and parking lots, and direct it to the Fraser River to prevent local flooding. The City's open watercourses are an integral part of this storm drainage system. Open watercourses are less expensive to maintain than closed pipes, can store higher volumes of water and provide valuable riparian habitat for plants and animals to support a healthy ecosystem.

The topography of Lulu Island is generally flat with a shallow groundwater table that moves very slowly compared to other areas in the Lower Mainland. The island was once covered with extensive peat bogs that left an abundance of organic material in the soil. This combination has resulted in high organic activity that naturally consumes the dissolved oxygen in rainwater soon after it percolates into the ground. This oxygen-poor groundwater allows anaerobic bacteria to leach metals (specifically iron and manganese) from the mineral soil, which makes the water slightly acidic. Background conditions have naturally elevated metals concentrations throughout Richmond surface and groundwater systems as the groundwater naturally enters and interacts with the open drainage system.

The City protects its open drainage ecosystems pursuant to the *Pollution Prevention and Clean-up Bylaw No. 8475*, which prohibits any polluting substances from entering the City's storm drainage system, open drainages, or soil. The City accommodates the need to accept water originating from construction dewatering through Part 6.1.2.1 of the *Pollution Prevention and Clean-up Bylaw No. 8475* and requires:

- Written confirmation from a Qualified Environmental Professional that groundwater concentrations will comply with the *BC Approved Water Quality Guidelines* (for the Protection of Aquatic Life) when discharged;
- A water quality monitoring and response plan;
- A drainage system capacity analysis by a Professional Engineer; and
- Proof that the project has been denied a permit to discharge into the Metrovan sanitary waste disposal system.

The Owner then enters into a legal agreement with the City, that defines the proposed discharge terms, following Staff's review.

Analysis

Staff assessed the current application and agreement process in consultation with various internal and external stakeholders. Key findings and proposed changes intended to improve the City's administrative efforts and reduce costs for development projects are summarized below.

Legal Agreements

The Owner of the source parcel must currently enter into a legal agreement with the City confirming the terms of the proposed groundwater discharge. Final agreements are executed by the General Manager of Engineering and Public Works and the Owner as per the *Pollution Prevention and Clean-up Bylaw No. 8475* and, and provide indemnity for the City as it relates to dewatering activities. Agreements are typically tenured for two-years however, amendments are often required during this term to accommodate variables such as construction delays.

Feedback collected during the assessment suggests that a legal agreement may not be the most effective instrument to facilitate construction dewatering and staff propose replacing the legal agreement with a permit and new fee. A permit would still function to limit the City's liability and hold the Owner responsible to comply with all applicable environmental laws but could limit the administrative burden of legal agreements. Amendments can also be more easily facilitated by staff with a permit revision process. The Owner would still be required to prepare and to submit the same supporting information for staff review as in the current agreement process.

Water Quality Standards

For City capital construction projects and other construction, builders must currently ensure that the discharge water quality concentrations meet the *BC Approved Water Quality Guidelines*. Feedback has identified that meeting these guidelines requires the use of complex filtration systems to reduce concentrations including the naturally occurring background metals. These

complex filtration systems are often required most of the construction phase and can cost up to \$500,000 for larger developments. Treatment systems also require the use of chemicals referred to as flocculants that can be introduced into the City’s open and closed drainage system.

Staff retained a Qualified Environmental Professional to assess suitable alternatives to the *BC Approved Water Quality Guidelines* that maintain environmental protection standards and consider the natural background metals concentrations. Staff recommend updating the discharge criteria requirements from all of the standards in the *BC Approved Water Quality Guidelines*, to the select parameters listed below. Monitoring for these parameters in the field will maintain environmental protection standards.

Minimum Discharge Criteria

pH	6.5 - 9.0
Temperature	< or = to 19°C
Dissolved Oxygen	< or = to 5.0 mg/L
Turbidity	< or = to 8 NTU and < or = to 50 NTU during storm events

Staff also recommend new environmental objectives to compliment these four parameters that considers the possible presence of additional contaminants of concern from historical site uses such as gas dispensers. If the Owner cannot provide evidence, pursuant to the *BC Contaminated Sites Regulations* that contamination is unlikely at a site, the Owner must meet the applicable *BC Contaminated Sites Regulation* and/or the *BC Water Quality Guidelines* for all potential contaminants of concern at the source parcel.

Users of the current non-stormwater discharge management system anticipate the proposed changes to reduce the water treatment costs for City capital projects and the development of uncontaminated properties by as much as 75%, while still protecting the local watercourses and infrastructure.

Field Monitoring & Cost Recovery

Staff currently manage non-compliance discharge concerns on a complaint basis due to the complex treatments systems and testing requirements involved but propose increasing compliance monitoring capabilities. Each of the proposed Minimum Discharge Criteria parameters can be easily measured in the field with environmental field monitoring equipment.

The current system does not impose a fee for the Owner. Staff recommends implementing a \$3,000 application fee to cover the costs of site inspections and field sampling equipment for the duration of a two year permit.

Staff also propose updates to the *Pollution Prevention and Clean-up Bylaw No. 8475* that will improve cost recovery initiatives in the event releases require immediate City resources to mitigate such as cleaning out closed drainage pipes.

The table below outlines all of the proposed bylaw amendments to the *Pollution Prevention and Clean-up Bylaw No. 8475 and the Consolidated Fees Bylaw No. 8636*.

Summary of Proposed Bylaw Amendments

Update the Pollution Prevention and Clean-up Bylaw No. 8475 to include the new Non-Stormwater Discharge process

- Elimination of the current Non-Stormwater Discharge Agreements, and replacement with a new Non-Stormwater Discharge Permit.
 - Replacement of the current discharge standards with new Richmond-specific Minimum Discharge Criteria for turbidity, temperature, pH, and dissolved oxygen that would have to be met for all discharges.
 - Addition of a signed statement from the project Qualified Environmental Professional certifying the quality of the proposed non-stormwater discharge and additionally confirming that the proposed non-stormwater discharge meets the Minimum Discharge Criteria.
 - Introduction of the Non-Stormwater Discharge Permit application fee and City-lead remediation cost recovery mechanisms.
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Update the Consolidated Fees Bylaw No. 8636 to include a Non-Stormwater Discharge Permit Application fee

- Quantification of a new Non-Stormwater Discharge Permit Application fee established in the Pollution Prevention and Clean-up Bylaw No. 8475 amendment.

Stakeholder Consultation

Consultation efforts in 2018 included presentations to internal and external stakeholders, Senior Government, the Development Community and technical professionals. Staff received positive support from each collaborative session and secured formal endorsement from the Urban Development Institute Liaison Committee regarding the proposed changes.

Technical information was also forwarded via email to the City’s Advisory Committee on the Environment, the provincial Ministry of Environment and Climate Change Strategy and the Federal Department of Fisheries.

Implementation

Pending Council’s approval of the proposed amendments in this report, staff will finalize updated application forms and publish a new Info Bulletin for applicants.

Staff will also prepare letters for all current Non-Stormwater Discharge Agreement holders, informing them of the updates, and inviting them to apply for the new discharge criteria, should they wish.

Financial Impact

None. The proposed changes will reduce costs for City capital projects and development without compromising environmental standards.

Conclusion

Richmond's open watercourses are an integral part of the City's Ecological Network and convey non-stormwater discharges from development. The proposed changes to the the City's non-stormwater discharge system will improve customer service, reduce dewatering costs, provide a cost recovery mechanism and protect the City's open drainage network from harmful pollutants.



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Warren Mills
Environmental Coordinator
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Pollution Prevention and Clean-Up Bylaw No. 8475, Amendment Bylaw No. 9950

The Council of the City of Richmond enacts as follows:

- 1. Pollution Prevention and Clean-Up Bylaw No. 8475, as amended, is further amended at section 1.1.1 by deleting the definitions of "agreement", "application", "general manager", "qualified environmental professional" and "responsible person", and inserting the following in alphabetical order:

APPLICANT means the person who has applied for a Permit.

ENVIRONMENTAL LAWS means all applicable federal, provincial, and City laws, statutes, regulations, ordinances, bylaws, and codes, all applicable policies, standards, protocols, orders, directives, and decisions issued, rendered or promulgated by any ministry, federal or provincial department, or judicial, administrative, or regulatory agency or body, whatsoever relating to fisheries, public health and safety, occupational health and safety, the protection or preservation of the environment, or the manufacture, operation, processing, distribution, use, treatment, storage, disposal, release, transport, handling, or remediation of contaminants, all as may be amended or replaced from time to time, including, but not limited to, the Environmental Management Act, S.B.C. 2003 c. 53, the Canadian Environmental Protection Act, 1999 S.C. 1999, c. 33, and the Fisheries Act, R.S.C. 1985, c. F-14 (as may be amended or replaced from time to time), and all applicable principles of common law and equity.

GENERAL MANAGER means the General Manager, Engineering and Public Works, and his or her respective designates and authorized agents.

MINIMUM DISCHARGE CRITERIA means the following minimum criteria that any permitted non-stormwater discharge must meet:

Table with 2 columns: Parameter and Value. Parameters include pH, Temperature, Dissolved Oxygen, and Turbidity with their respective ranges.

Notes: NTU- Nephelometric Turbidity Units, C- Celsius, mg/L- milligrams per Litre

NON-STORMWATER DISCHARGE QUALITY DECLARATION means a statutory declaration or letter, in the form provided by the **City** from time to time or in form otherwise satisfactory to the **City**, signed and sealed by a **Qualified Environmental Professional**, certifying the findings of site investigation work as to the quality of the proposed **non-stormwater discharge** and confirmation that the proposed **non-stormwater discharge** meets the **minimum discharge criteria**.

QUALIFIED ENVIRONMENTAL PROFESSIONAL means an applied scientist or technologist registered and in good standing in British Columbia with an appropriate professional organization constituted by provincial statute, insured against professional liability arising from errors and omissions occurring in the performance of professional services, acting under that association’s code of ethics, and subject to disciplinary action by that association, including but not limited to agrologists, biologists, engineers, foresters, geoscientists and technologists.

PERMIT means an authorization by the **City** to allow **non-stormwater discharge** to enter a **drainage system** or **watercourse**.

PERMITTEE means the holder of a **Permit**.

RESPONSIBLE PERSON means the person who has possession, charge, or control of a **polluting substance** when a **spill** of such **polluting substance** occurs, or is at imminent risk of occurring.”

- 2. Pollution Prevention and Clean-Up Bylaw No. 8475, as amended, is further amended by deleting Part Six: Non-Stormwater Discharge Management and replacing it with the following:

“PART SIX: NON-STORMWATER DISCHARGE MANAGEMENT

6.1 Provisions for Non-Stormwater Discharge

6.1.1 Non-Stormwater Discharge Permit

No person shall allow any **non-stormwater discharge** to enter any **drainage system** or any **watercourse** without first making an application for and obtaining a **Permit**, and every such **discharge** shall be undertaken in accordance with all requirements and regulations of this bylaw, the terms and conditions of the **Permit**, and all applicable **environmental laws**.

6.1.2 Application Requirements

6.1.2.1 Unless exempted by the **General Manager**, an application for a **Permit** must:

- (a) be made in the form provided from time to time by the **City**;

- (b) be made by the **owner** of the source **parcel**, or by an agent of the **owner**, provided that such agent has been granted written authority to act on behalf of the **owner**;
 - (c) include the applicable fees as specified in the *Consolidated Fees Bylaw No. 8636*;
 - (d) include written confirmation from the **owner** that the **owner** will waive, release, remise, indemnify, and save harmless the **City** and its elected officials, agents, employees, officers, and servants from and against all claims, demands, losses, costs (including legal costs), damages, actions, suits, or proceedings whatsoever brought by reason of, or arising from, the issuance of the **Permit** by the **City**, or the breach of any of the terms and conditions of the **Permit** by the **owner** or by those for which the **owner** is responsible at law, or the proposed **discharge** of **non-stormwater discharge** by or on behalf of the **owner**;
 - (e) be accompanied by one of the following:
 - (i) a **non-stormwater discharge quality declaration** satisfactory to the **City**; or
 - (ii) a copy of the written approval of the proposed **discharge** from the applicable federal or provincial regulatory authority as required by the applicable **environmental laws**;
 - (f) be accompanied by proof of insurance in an amount and on the terms satisfactory to the **City**;
 - (g) be accompanied by a **water quality monitoring and response plan** satisfactory to the **City**;
 - (h) be accompanied by a capacity analysis of the **drainage system** and, based on the capacity analysis, a letter signed and sealed by an appropriate **Qualified Environmental Professional** (being a professional engineer) confirming that the **drainage system** has capacity to accommodate the flow rate of the proposed **discharge**;
 - (i) if required by the **City**, be accompanied by evidence satisfactory to the **City** that the **owner** has been denied a permit to **discharge** the **non-stormwater discharge** into the sanitary waste disposal system servicing the **parcel**, if any; and
 - (j) be accompanied by any supporting documentation requested by the **City** relevant to the matters referred to in subsections (e), (g), (h) and/or (i) above.
- 6.1.2.2 An application will be deemed to have been abandoned if the **Applicant** fails to fully and completely respond to a request by the **General Manager** for documentation or information under this bylaw within 6 months of the date the request is made. Once abandoned, all application fee(s) collected will be forfeited to the **City**. If the **Applicant** wishes to proceed with a **discharge** after any such abandonment, the **Applicant** must, unless exempted in writing by the **General Manager**, submit a new

application for a **Permit** and must pay an additional non-refundable application fee as specified in the *Consolidated Fees Bylaw No. 8636*.

- 6.1.2.3 If it is determined by the **General Manager** that any **discharge of non-stormwater discharge** has occurred without a valid **Permit**, all work must cease and the appropriate **Permit** application must be immediately submitted with a non-refundable application fee of twice the amount as specified in the *Consolidated Fees Bylaw No. 8636*.

6.1.3 Permit Issuance

- 6.1.3.1 Subject to section 6.1.3.2, the **General Manager** may issue a **Permit** upon being satisfied that:

- (a) the proposed **discharge of non-stormwater discharge** complies with this bylaw and all applicable **environmental laws**;
- (b) the proposed **discharge of non-stormwater discharge** can be carried out safely, without undue nuisance or interference to adjacent **parcels** or the public, or damage or injury to persons or property;
- (c) the **Applicant** has complied with the applicable requirements of section 6.1.2; and
- (d) the **Applicant** has paid to the **City** all applicable fees required under the *Consolidated Fees Bylaw No. 8636*.

- 6.1.3.2 The **General Manager** may refuse to issue a **Permit** if the requirements of section 6.1.3.1 have not been met or the **General Manager** is of the opinion that the proposed **discharge of non-stormwater discharge** will or is reasonably likely to:

- (a) endanger, damage, or otherwise adversely affect any adjacent **parcel**, structure, highway, easement, utility works and services or right-of-way, whether privately or publicly owned;
- (b) foul, obstruct, destroy, impede, divert, or otherwise adversely affect any **watercourse** or **drainage system**, whether privately or publicly owned;
- (c) contravene any applicable **environmental laws**;
- (d) threaten the health, safety, or welfare of the public or be otherwise contrary to the public interest;
- (e) cause a federal, provincial or municipal authority to incur excessive costs to provide public utilities, works, or services to the subject **parcel**, or an adjoining or reasonably adjacent **parcels**.

6.2 Non-Stormwater Discharge Regulations

6.2.1 In addition to any terms and conditions contained in a **Permit**, no person shall cause or permit the **discharge** of **non-stormwater discharge** except in accordance with the following requirements, unless exempted in writing by the **General Manager**:

- 6.2.1.1 the **Permittee** shall engage a **Qualified Environmental Professional** to supervise and monitor the **discharge**;
- 6.2.1.2 the **Permittee** conducts water quantity monitoring to confirm and ensure that the **discharge** does not exceed the allowable flow rate set out in the capacity analysis referred to in subsection 6.1.2.1(h) of this **Bylaw**, and, if requested by the **City**, provides a copy of the monitoring results signed and sealed by a **Qualified Environmental Professional** to the **City**;
- 6.2.1.3 the **Permittee** conducts continuous monitoring of water levels in the pipe, box culvert or ditch receiving the **discharge** and if water levels overload the pipe or box culvert or exceed the maximum hydraulic gradeline of the ditch, as specified in the capacity analysis of the **drainage system** referred to in subsection 6.1.2.1(h) of this **Bylaw**, the **Permittee** shall:
 - (a) immediately discontinue the **discharge**;
 - (b) report to the **City** that the **drainage system** is over capacity;
 - (c) retain the water from the **discharge** on the subject **parcel** until the **drainage system** is no longer over capacity; and
 - (d) only resume the **discharge** once the **drainage system** is no longer over capacity and the **discharge** will not cause it to become over capacity.
- 6.2.1.4 the **Permittee** complies with the **water quality monitoring and response plan** and, if requested by the **City** provide a copy of the monitoring results to the **City**;
- 6.2.1.5 the **discharge** complies with the **minimum discharge criteria**;
- 6.2.1.6 the **Permittee** complies with all applicable **environmental laws**;
- 6.2.1.7 the **Permittee** shall obtain any and all approvals and authorizations required, in addition to the **Permit**, by any applicable governmental authority, public utility or other governmental agency; and
- 6.2.1.8 the **Permittee** shall immediately report to the **City** any emergency or the existence of any condition which prevents the operation of any treatment system required in relation to the water being **discharged**.

6.3 Permit Expiry

6.3.1 Every **Permit** issued under this bylaw shall expire and cease to authorize any **discharge** of **non-stormwater discharge** twenty-four (24) months following the date of issue or upon such earlier date as may be specified in the **Permit** unless an expiry date for a different term is specified in the **Permit** or a renewal has been issued in accordance with section 6.3.2..”

3. Pollution Prevention and Clean-Up Bylaw No. 8475, as amended, is further amended by deleting the word ‘**agreement**’ from where it appears in sections 7.1.1 and 9.1.1 and replacing it with the word “**Permit**”.
4. Pollution Prevention and Clean-Up Bylaw No. 8475, as amended, is further amended by deleting section 8.1.1 and replacing it with the following:

“8.1.1 Where the **City** has determined that there has been a possible contravention of this bylaw which poses a possible threat to the environment or the health or safety of individuals, and immediate action is required to remedy the situation, the **City** may immediately take whatever action the **City** considers necessary to remedy the situation without the necessity of full compliance with the provisions of this bylaw at the time it is undertaken, and the expense of doing so, plus a reasonable sum as determined by the **General Manager** as a charge for the **City's** overhead, shall be paid by the **owner**. If not paid within 90 days, the expense, with interest at the prescribed rate and costs, shall be recovered in the same manner and with the same remedies as municipal taxes.”

5. Pollution Prevention and Clean-Up Bylaw No. 8475, as amended, is further amended by inserting the following as a new “PART NINE: ENFORCEMENT” and renumbering the remaining Parts and sections:

“PART NINE: ENFORCEMENT

9.1 Suspension of a Permit

9.1.1 The **General Manager** may suspend any **Permit** where, in the opinion of the **General Manager** there is a contravention of or non-compliance with the terms and conditions of the **Permit**, this bylaw, or any other relevant **City** bylaw. The **Permit** shall remain suspended and will cease to authorize the **discharge** of **non-stormwater discharge** until, in the opinion of the **General Manager**, compliance is obtained.

9.1.2 Where a **Permit** is suspended, the **General Manager** will cause written notice of suspension to be delivered to the **Permittee** and to the **owner** of the subject **parcel** by registered mail and to be posted on the subject **parcel** where possible.

9.1.3 Sections 9.1.1 and 9.1.2 are without prejudice to any other remedies available to the **City** under this bylaw, any other law, or in equity.

9.2 Non-compliance

9.2.1 If a **Permittee** or the **owner** of the subject **parcel** contravenes a provision of this bylaw or a term of a **Permit**:

9.2.1.1 such person shall immediately cease any and all contravening actions;

9.2.1.2 the **General Manager** may notify the **Permittee** or the **owner** in writing of such contravention; and

9.2.1.3 the **General Manager** may instruct the **Permittee** or the **owner** to correct the contravention by a date specified in the notice. If the correction of the contravention will not be completed by the date specified in the notice, the **Permittee** or the **owner** as instructed by the **General Manager** must inform the **General Manager** of such and immediately take all reasonable steps to begin to correct the contravention.

9.2.2 If a **Permittee** or the **owner** of the subject **parcel** fails to cease any and all contravening actions and/or correct a contravention referenced in section 9.2.1 by the date specified in the notice, or otherwise instructed by the **General Manager**:

9.2.2.1 the **City** may carry out such works and undertake such actions as the **City** deems necessary to correct the contravention;

9.2.2.2 the **General Manager** may revoke or suspend the relevant **Permit**, if any; and

9.2.2.3 in the event that any person having received notice fails to correct a contravention within the time specified in the notice, the **City** or its appointed agents may enter upon the subject **parcel** or any part thereof and carry out the works required to remedy the contravention, and the expense of doing so, plus a reasonable sum as determined by the **General Manager** as a charge for the **City's** overhead, shall be paid by the **owner**. If not paid within 90 days, the expense, with interest at the prescribed rate and costs, shall be recovered in the same manner and with the same remedies as municipal taxes.

9.2.3 Other than in case of emergency (in the opinion of the **General Manager**), in which case no notice is required, the **City** will give ten days' written notice to the **Permittee** of the **City's** intention to carry out works pursuant to section 9.2.2.

9.2.4 If the **City** carries out works pursuant to section 8.1.1 or 9.2.2, the **Permittee** or the **owner** of the subject **parcel** will reimburse the **City** for the **City's** cost of carrying out such works, within ten days of receiving a written request by the **City** for such reimbursement.

9.2.5 The **City** will not be liable for any damage, loss or expense of any nature or kind whatsoever, arising out of or in connection with the issuance of a **Permit**, or the **discharge** of **non-stormwater discharge**, or any other action by the **City** under this bylaw or a **Permit**.

9.2.6 In the event of damage to **City** or privately-owned **drainage system, watercourses**, highways, lands, or other **City** property or privately-owned property or facilities, resulting from a

discharge of non-stormwater discharge operation, the **Permittee**, or an agent of the **Permittee**, will promptly and properly repair the damage to the satisfaction of the **General Manager.**”

- 6. This Bylaw is cited as “**Pollution Prevention and Clean-Up Bylaw No. 8475, Amendment Bylaw No. 9950**”.

FIRST READING

SECOND READING

THIRD READING

ADOPTED

CITY OF RICHMOND
APPROVED for content by originating dept.
<i>EP</i>
APPROVED for legality by Solicitor
<i>JL</i>

MAYOR

CORPORATE OFFICER



CONSOLIDATED FEES BYLAW NO. 8636, AMENDMENT BYLAW NO. 9951

The Council of the City of Richmond enacts as follows:

- 1. The Consolidated Fees Bylaw No. 8636, as amended, is further amended by adding Schedule A attached to and forming part of this bylaw to "SCHEDULE - POLLUTION PREVENTION AND CLEAN-UP" to Consolidated Fees Bylaw No. 8636.
2. This Bylaw is cited as "Consolidated Fees Bylaw No. 8636, Amendment Bylaw No. 9951".

FIRST READING

SECOND READING

THIRD READING

ADOPTED

Four horizontal lines for signatures or dates.

CITY OF RICHMOND
APPROVED for content by originating dept. (with signature)
APPROVED for legality by Solicitor (with signature)

MAYOR

CORPORATE OFFICER

POLLUTION PREVENTION AND CLEAN-UP BYLAW NO. 8475

Permit Application Fees

Section 6.1.2

Description	Fee
<u>Application Fee</u>	\$3000.00