

July 11, 2017

Ref. No.: 10-1581T07

Imperial Oil Limited  
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Attention: Environmental Services

Re: Performance Verification Plan for  
Affected Ministry of Transportation and Infrastructure Lands to the East  
of 222 Collis Street  
Creston, British Columbia  
Location No.: 88002172/JW.00221

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Further to your request, Parsons Inc. (Parsons) is pleased to provide this Performance Verification Plan (PVP) in support of an application for a risk-based Certificate of Compliance (CofC) for the affected Ministry of Transportation and Infrastructure (MOTI) property located to the east of 222 Collis Street in Creston, British Columbia (the MOTI Property). The PVP presents the principal risk management measures that apply within the Management Area on the MOTI Property for the CofC to remain valid (i.e. the key risk management controls of Schedule B of the CofC which must remain in place within the Management Area on the MOTI Property). The PVP was prepared in accordance with British Columbia Ministry of Environment (BCMOE) Procedure 12: Procedures for preparing and issuing contaminated sites legal instruments (Procedure 12).

A plan indicating the areal extent of the Management Area on the MOTI Property, relevant to this PVP, is indicated in Schedule A of the CofC.

## **PRINCIPAL RISK MANAGEMENT CONTROLS**

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A screening level risk assessment (SLRA) was conducted for the MOTI Property, and the results presented in the Parsons reports, "Supplemental Preliminary Site Investigation/Detailed Site Investigation/Confirmation of Remediation, 222 Collis Street, Creston, British Columbia (to be finalized)" and "Screening Level Risk Assessment, 222 Collis Street and Portions of Highway 3A Adjacent 222 Collis Street, Creston, British Columbia (to be finalized)". The principal risk



management measures on which the risk assessment were based, as presented in Schedule B of the CofC, are as follows:

- (a) Soil contamination within the Management Area on the MOTI property must remain at a depth of at least 1 m below future grade and not be redistributed as surface soil, nor is a change permitted in future grade elevation from the current elevation that would cause current soil contamination to be within 1 m of grade.

## **DETERMINATION OF PROCEDURE 12 REMEDIATION TYPE**

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Based on the risk management measures within the Management Area on the MOTI Property, (i.e. the use of institutional controls to mitigate/eliminate risks within the Management Area on the MOTI Property and lack of imminent risks in the event that controls were not implemented) the Remediation Type applicable within the Management Area on the MOTI Property is considered to be Type 2.

Under a Remediation Type 2 scenario, Procedure 12 indicates that a PVP is required, while an operations and maintenance plan may be required.

## **PERFORMANCE VERIFICATION PLAN**

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A PVP is required to document that the principal risk management measures upon which the screening level risk assessment is based are met within the Management Area on the MOTI Property.

If requested by the Director, the responsible person(s) must provide a signed statement on whether the principle risk management control outlined in (a) above is being met.

Performance verification actions for the MOTI Property include the following:

- (a) Communication with the MOTI Property owner that soil contamination within the Management Area must remain at a depth of at least 1 m below future grade and not be redistributed as surface soil, nor is a change permitted in future grade elevation from the current elevation that would cause current soil contamination to be within 1 m of grade.

The assumptions in the SLRA regarding no direct exposure pathway to the residual contamination in soil was based on the depth of the remaining soil, and consistent with the elevation of the MOTI Property and surrounding properties which are at approximately the same elevations.

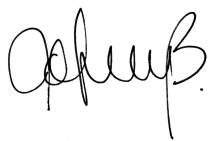
As such, an advisory for the Management Area on the MOTI Property that: "soil contamination within the Management Area must remain at a depth of at least 1 m below future grade and not be redistributed as surface soil, nor is a change permitted in future grade elevation from the current elevation that would cause current soil contamination to be within 1 m of grade" is considered appropriate to meet this risk management measure. The listing of this risk management measure in Schedule B of the CofC meets this requirement.

In summary, it is our opinion that the advisory listed in Schedule B of the CofC is sufficient for the risk management measures required for the MOTI Property.

We trust that the foregoing information is satisfactory for your present requirements. Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

PARSONS INC.



J.A. Bright, P.Eng.

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## **LIMITATION OF LIABILITY, SCOPE OF REPORT AND THIRD PARTY RELIANCE**

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The investigations undertaken by Parsons with respect to this report and any conclusions or recommendations made in this report reflect Parsons' judgment based on the site conditions observed at the time of the site inspection on the date(s) set out in this report and on information examined at the time of preparation of this report. This report has been prepared for specific application to this site and it is based, in part, upon visual observation of the site, subsurface investigation at discrete locations and depths, and specific analysis of specific chemical parameters and materials during a specific time interval, all as described in this report. Unless otherwise stated, the findings cannot be extended to previous or future site conditions, portions of the site which were unavailable for direct investigation, subsurface locations which were not investigated directly, or chemical parameters, materials or analysis which were not addressed. Substances other than those addressed by the investigation described in this report may exist within the site, substances addressed by this investigation may exist in areas of the site not investigated and concentrations of substances addressed which are different than those reported may exist in areas other than the locations from which samples were taken.

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### **BRITISH COLUMBIA MINISTRY OF ENVIRONMENT'S RELIANCE**

Notwithstanding the above, the British Columbia Ministry of Environment is permitted to rely on this report and the information contained herein to the extent necessary to confirm that Imperial Oil has met their statutory obligations with respect to the Performance Verification Plan.