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Detailed Screening Update

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- CSSAF Form
- Draft Instruments
- Summary of Site Condition
- Administrative Guidance 11
- Performance Verification Plans
- Other Submission Issues
- Effects of Omnibus Updates
- Questions

Making a Submission

Tools For AP's Making Submissions on the CSAP Make a Submission Webpage

- CSAP Submission transmittal letter
- CSAP Annotated SoSC
- CSAP AG 11 Communications Template (doc)
- Arms Length Review of Submission Template [doc 38kb]
- Detailed and Preliminary Screening Checklists

Detailed Screening Overview

From the BC CSAP Society website (csapsociety.bc.ca):

“The detailed screening is undertaken by an approved professional (the detailed screener, DS) who has been pre-qualified to act as members on performance assessment panels. The detailed screening involves checking the summary of site conditions (SoSC), the draft instrument and other required forms and documents for **completeness** and **consistency**.”

Detailed Screening Overview (cont.)

Some things Detailed Screeners look at:

- CSSAF Application form
- Draft instrument and Cover Letter
- Summary of Site Condition
- Communications (AG11)
- Site Registry
- Notifications (NOMs, NOIRs)
- Land Title and Legal Survey
- Site Risk Classification reports
- Performance Verification Plans
- Report checklists (TG10 & TG11)

Full list:

[csapsociety.bc.ca/members/
guidelines/submission-
screening/](https://csapsociety.bc.ca/members/guidelines/submission-screening/)

Detailed Screening Overview (cont.)

Some things Detailed Screeners usually DON'T look at:

Reports

(PSIs, DSI, CORs ...)

- Reports are only accessed by a Delegated Member of the PAC should the submission be referred to the PAC for issues which could not be resolved.

Application Forms

www2.gov.bc.ca/gov/content/environment/air-land-water/site-remediation/guidance-resources/forms

Common CSSAF error:

Part C - Application Information		Select one or more of the listed services	
<i>Services Requested as listed in Contaminated Sites Regulation Schedule 3 Table 2 and Table 3</i>			
Report Reviews		Other services	
<input checked="" type="checkbox"/> Preliminary site investigation		<input checked="" type="checkbox"/> Summary of Site Condition	<input type="checkbox"/> Monitoring report
<input checked="" type="checkbox"/> Detailed site investigation		<input type="checkbox"/> Determination of Contaminated Site	<input type="checkbox"/> Transfer agreement
<input type="checkbox"/> Remediation plan without risk assessment		<input type="checkbox"/> Approval in Principle	<input type="checkbox"/> Indemnification
<input type="checkbox"/> Remediation plan with risk assessment		<input checked="" type="checkbox"/> Certificate of Compliance	<input type="checkbox"/> Covenant
<input checked="" type="checkbox"/> Risk assessment not in a remediation plan		<input type="checkbox"/> Voluntary Remediation Agreement	<input type="checkbox"/> Additional services / functions
<input checked="" type="checkbox"/> Confirmation of remediation		<input type="checkbox"/> Wide area site designation	<input type="checkbox"/> Allocation panel
<input type="checkbox"/> Background substance concentrations		<input type="checkbox"/> Minor contributor determination	
<input type="checkbox"/> Site-specific numerical standards		<input type="checkbox"/> Contaminated Soil Relocation Agreement	
Process	<input type="checkbox"/> Ministry review	<input type="checkbox"/> External review	<input checked="" type="checkbox"/> Roster submission
		Resubmission? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Optional Transmittal Letter

Dear Sir/Madam

Re: Transmittal Letter – Recommendation under Protocol 6 for a (Instrument)

Site Owner: XXXXXXXXXXXXXXXXXXXX

Responsible Person: XXXXXXXXXXXXXXXXXXXX

Civic Address of Site: XXXXXXXXXXXXXXXXXXXX, British Columbia

BC MOE File No: 26250-20/XXXXX

SITE No.: XXXXX

(AP Name) of (Company name) has reviewed the reports submitted in support of this application as per the attached Summary of Site Condition for a:
(Instrument)

Optional Transmittal Letter

STAND ALONE DOCUMENTATION (electronic [pdf or word as specified] file) on a CD or memory stick:

- ☐ Completed Contaminated Site Service Application Form
- ☐ Draft Instrument Cover Letter – word version
- ☐ Draft Instrument – word version
- ☐ Completed Summary of Site Condition (CSAP annotated version used)
- ☐ Completed Site Risk Classification Form (not required for negative Determinations)
- ☐ Completed Technical Guidance 10 (PSI checklist)
- ☐ Completed Technical Guidance 11 (DSI Checklist)
- ☐ Copy of Land Title Office legal plan(s) or other land survey results (current within last 6 months)
- ☐ Area Based Site Registry Search, 0.5 km radius (current search within the last 6 months)
- ☐ Detailed Site Registry Search (current report within the last 6 months)

Draft Instruments

- Templates are on CSAP website's Submission Manager
- Draft of a **legal** document
- Contaminant names must be correct for each medium (soil, groundwater, etc.) and each standard (aquatic, drinking water, etc.)
 - Examples:
 - ~~EPHs~~ → LEPHs and/or HEPHs
 - ~~EPH~~₁₀₋₁₉ → EPHw₁₀₋₁₉ or EPHw10-19 (Omnibus)
 - ~~VHw~~ → VHw₆₋₁₀ or VHw6-10 (Omnibus)
 - ~~HEPHw~~
 - ~~EPH~~₁₉₋₃₂
 - No standard for LEPHw in drinking water – did you mean EPHw₁₀₋₁₉?
 - No standard for VPHw in drinking water – did you mean VHw₆₋₁₀?

It looks like you are writing a
Contaminated Sites legal instrument.
Do you need help with that?

☒ Yes ☐ No



Draft Instruments (cont.)

- Must correspond with the Summary of Site Condition

Schedule C

Substances and Uses

Substances remediated in soil for commercial land soil use:

To meet numerical remediation standards:

- Toluene.

To meet risk-based remediation standards:

- VPHs,
- Benzene, ethylbenzene, xylene.

7.2 Substances Remediated and Standards or Criteria

(If the site required remediation and has been remediated.)

	Substances Remediated for Each Type of Standard / Criteria	
	Numerical Standards (Criteria for Sediments, Vapour)	Risk based Standards (Criteria for Sediments, Vapour)
Soil	Toluene	Benzene
		Xylenes
		Ethylbenzene
		VPHs

Summary of Site Condition

www2.gov.bc.ca/gov/content/environment/air-land-water/site-remediation/guidance-resources/forms

- Annotated Summary of Site Condition
 - Updated June 2017
 - csapsociety.bc.ca/wp/wp-content/uploads/170627_SummarySiteCondition_Annotated_REV5.pdf
 - Very thorough

Part 2: Executive Summary

(To be completed by the Approved Professional(s) reviewing site investigation, risk assessment, remediation or confirmation of remediation reports)

Ensure that all the information requested in Part 2 is provided, if available.

Site Location:
(The site and location plans are to be provided as Schedule A of the draft instrument.)
Hard copies of figures and plans do not have to be submitted with SoSC if they are:

- included in submitted reports and referenced in the SoSC, or
- included in Schedule A of a draft contaminated sites legal instrument submitted with the SoSC.

Subject Site: **If you are preparing a SoSC for a site and affected off-site property / management areas with separate instruments, you must prepare an individual SoSC for each instrument.** (Note that you should only be charged for one review fee)

For clarity provide comments in this section to describe the site relationship here. For example:
This summary of site condition has been prepared for an off-site management area located in the roadway adjacent to the [redacted] Service Station [redacted] [redacted] (ICS Site ID: [redacted]). The [redacted] is impacted by contaminants [redacted]

- APs should identify their role in the review of the submission
 - This normally involves identifying the report they were responsible for reviewing

Summary of Site Condition (cont.)

- Water use information
 - SoSC Section 4.2: Site Conditions > Hydrogeology
 - Follows Protocol 21 Water Use Determination process
 - Aquatic use
 - Irrigation and Livestock use
 - Natural confining barriers
 - Current drinking water use
 - Future drinking water use
 - Unconsolidated and bedrock aquifers
 - Director's determination of water use
 - Background groundwater decision

Summary of Site Condition (cont.)

Arm's Length Review

- Screeners have noted submissions where the SAAP wrote 'N/A' in section 7.3 even though the RAAP wrote '4'.

7.3 Arm's Length Review

There may have been an arm's length review of one or more of the following recommendations to the Director of Waste Management:

1. Making a recommendation to a Director in support of an application for an Approval in Principle based on remediation to numerical standards or a screening level risk assessment where there is offsite migration at the site.
2. Making a recommendation to a director in support of an application for an Approval in Principle based on a risk assessment (other than a screening level risk assessment) and remediation to risk-based standards
3. Making a recommendation to a Director in support of an application for a Certificate of Compliance based on remediation to numerical standards or a screening level risk assessment where there is offsite migration at the site.
4. Making a recommendation to a Director in support of an application for a Certificate of Compliance based on a risk assessment (other than a screening level risk assessment) and remediation to risk-based standards
5. Making a recommendation to a Director in support of an application for a Contaminated Soil Relocation Agreement based on a screening level risk assessment for the parcel at which the soil is to be deposited where there is offsite migration at the source site
6. Making a recommendation to a Director in support of an application for a Contaminated Soil Relocation Agreement based on a risk assessment (other than a screening level risk assessment) for the parcel at which the soil is to be deposited
7. Making a recommendation to a Director in support of any other application based on risk assessment or risk management (other than a screening level risk assessment) not otherwise described in any other row in this list, as required under a protocol signed by a Director.

If this is the case please have the Approved Professional who carried out the arm's length review to sign below, specifying the type of arm's length review done for the site.

Type of Arm's Length Review (Insert number from list)	Name(s) of Approved Professional(s):	Signature(s) of Approved Professional(s):	Date:
N/A			
4			

Summary of Site Condition (cont.)

Arm's Length Review (cont.)

- It is not acceptable for a numerical standards AP to self-review the numerical standards portion of a Protocol 6 submission (other than a screening level risk assessment) for a risk-based standards Approval in Principle or Certificate of Compliance.

Summary of Site Condition (cont.)

- Vapour attenuation factors
 - SoSC Section 4.4: Applicable Numerical Concentration Standards and Criteria
 - Include rationale/justification for the choice of attenuation factors (e.g., slab on grade, no contact with groundwater)

Soil (standards):							
Property	CSR Land Use						
		AL	PL	RL	CL	IL	Other
Subject site	Current	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Proposed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Receiving site <i>(if completed in support of a Contaminated Soil Relocation Agreement)</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Offsite impacted property / management area		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If Other is specified above, please explain: *(applicable or excluded guidance, protocols or policies specific to the site)*

If vapour attenuation factors have been used, please include a description of the assumptions regarding current/future development of the Site that the selected vapour attenuation factors are based on, such as the following examples:

- Current site grade will be maintained, or
- Attenuation factors were applied using the assumptions that future building will be slab on grade and no groundwater contact with the slab will occur, or
- Attenuation factors were based on a two story underground parkade where the slab will not be in contact with the groundwater

Administrative Guidance 11

www2.gov.bc.ca/assets/gov/environment/air-land-water/site-remediation/docs/administrative-guidance/ag11_2013.pdf

Communications

- Government of BC website > Contaminated Sites > Guidance and Resources > Administrative Guidance > AG11
- Summary of things we check for:
 - Notifications of Offsite Migration sent to ENV and the affected parcel owners
 - Letters sent to the affected parcel owners:
 - Declaring that you will seek an instrument
 - Requesting comments
 - Providing all relevant information about contaminating substances, standards, risk, restrictions, remediation type, reports, and boundaries
 - Including a copy of the draft instrument



Performance Verification Plans (PVPs)

- A PVP is no longer required in some cases
 - Applies to submissions where a PVP **does not add any further clarity** beyond the risk controls that must be listed in the instrument
 - Must provide **rationale** for PVP exclusion where previously required
- Example 1: **PVP is no longer required for the risk control “groundwater from the site must not be used for drinking water purposes”** for all sites.
 - Example rationale: unlikelihood of drinking water use due to being in an urban center with a municipal water supply
- Example 2: **PVP is no longer required for inspection/monitoring of pavement or asphalt as an “engineered control”**
 - Example rationale: Likelihood that pavement will be maintained due to being on a City of Vancouver sidewalk or roadway

Other Submission Issues

- Submitting APs are asked to **include copies of correspondence from ENV** where issues have been discussed with MOE and variances from regulation/protocol/guidance have been agreed upon.
- The ministry requires site-specific in-situ hydraulic and stratigraphic data **specific to each site** when exempting sites directly through the Protocol 6 process
 - Section 4.2 in the Summary of Site Condition (**Topography, Stratigraphy, Hydrogeology**) should be **specific for Source and Affected Parcels**

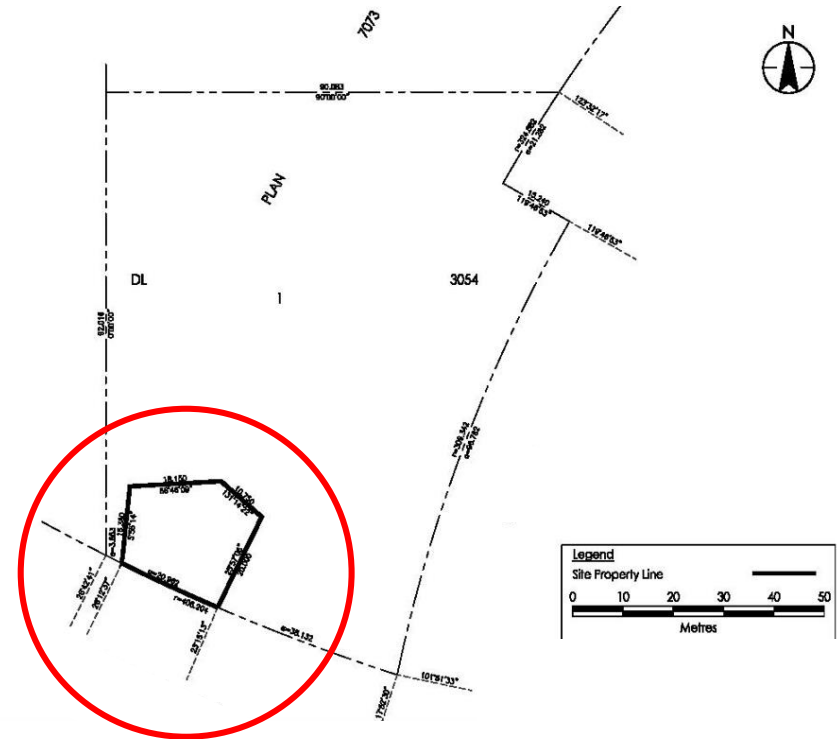
Other Submission Issues (cont.)

Approvals may be required as per Table 2 of Protocol 6:

- Involving the **extent of the area of contamination delineated and remediated** (not addressing entire extent of contamination – AG15)
- Involving **background substance** concentrations (Protocol 4 and Protocol 9)
- Involving **orders** (SWISS, COORS)
- Involving **risk assessments**

Other Submission Issues (cont.)

- Where **vapour attenuation factors apply to a portion of a site**, a **supplemental plan** should be provided and labelled to show where they apply
- If both the numerical and risk-based standards are used as remediation standards in a legal instrument, **the boundaries of the areas to which each type of standard applies must be shown in a supplemental site plan.**



Effects of Omnibus Updates

Increased volume of submissions



Increased workloads for screeners

Questions

