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May 9, 2016

Project: 130904

Corporation of the City of New Westminster
511 Royal Avenue
New Westminster, BC
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ATTENTION: Roger Emanuels

REFERENCE: Performance Verification Plan,
Canada Pacific Limited Management Area Associated with
Poplar Landing (Former Doman Industries Ltd. Sawmill),
1400 Quayside Drive, New Westminster, BC
SITE ID: 18377, PIDs: 006-639-488 and 006-639-542

On behalf of the **Corporation of the City of New Westminster (the City)**, SNC-Lavalin Inc. (SNC-Lavalin) has completed this Performance Verification Plan (PVP) in support of an application for a Certificate of Compliance (CofC) for the management area (MA) associated with Poplar Landing (Former Doman Industries Ltd. Sawmill), 1400 Quayside Drive, New Westminster, BC, BC Ministry of Environment (MoE) site ID # 18377 (herein referred to as the “MA” or more specifically as “CP MA-2”). The MA is owned and managed by Canadian Pacific Ltd. The PVP presents the principal risk controls that apply at CP MA-2 to ensure the CofC for the MA remains valid (i.e., the key risk controls of Schedule B). The PVP was prepared in accordance with MoE Procedure 12: Procedures for preparing and issuing contaminated sites legal instruments (2015a) and Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans (2015b).

Principal Risk Controls

A Human Health and Ecological Risk Assessment (HHERA) was conducted for the MA (including, CP MA-2), and the results presented in the SNC-Lavalin report, *Human Health and Ecological Risk Assessment, Areas of Environmental Concern and Management Areas Associated with Poplar Landing (Former Doman Industries Ltd. Sawmill), 1400 Quayside Drive, New Westminster, BC*, prepared by SNC-Lavalin, dated 2016, (SNC-Lavalin, 2016a). The HHERA was prepared based on the findings and conclusions presented in the SNC-Lavalin reports, *2007 to 2015 Post Remediation and Supplemental Site Assessments, Poplar Landing (Former Doman Industries Ltd. Sawmill), 1400 Quayside Drive, New Westminster, BC*, dated 2016 and *Updated Evaluation of Polychlorinated Dioxins and Furans Concentrations in Soil, 1400 Quayside Drive, New Westminster, BC (BC MoE Site No. 8071)*, dated 2016 (SNC-Lavalin, 2016b;c).





The principal risk controls for the MA, at CP MA-2, on which the SNC-Lavalin (2016a) risk assessment was based, as presented in Schedule B of the CofC, are as follows:

- › The MAs must continue to have < 1000 m² of contiguous vegetation (between the MA and adjacent lands).

Determination of Procedure 12 Remediation Type

Based on the principal risk controls for the MA (i.e., the use of institutional controls to mitigate/eliminate risks at CP MA-2 and lack of imminent risks in the event that controls were either not implanted or were rendered ineffective), the Remediation Type applicable at the MA is considered to be Type 2.

Under a Remediation Type 2 scenario, MoE (2015a; 2015b) indicates that a PVP is required, while an operations and maintenance plan may be required.

Performance Verification Plan

A PVP is required to ensure that the principal risk controls upon which the HHERA is based are being met at the MA.

This includes the maintenance of up-to-date records of performance verification actions and results for the MA being maintained by the responsible person (or their agents). If requested by the Director, the responsible person (or their agents) will provide these records to the MoE. As well, if requested by the Director, responsible person(s) will provide a signed statement on whether conditions set out in this Schedule B are being met.

Performance verification actions for CP MA-2 include the following:

- › Communication with the owner/operator that the MAs must continue to have < 1000 m² of contiguous vegetation (between the MA and adjacent lands). The MA is currently zoned for industrial purposes and is used as a transportation corridor. Surrounding land use consists of industrial, commercial and residential properties. Currently, the MA does not constitute significant terrestrial habitat, nor is it likely to in the future given the presence of transportation corridors (roadway and railway) on and adjacent to the MA. Consequently, the establishment of significant terrestrial habitat at the MA is considered unlikely.

Based on the above, an advisory for CP MA-2 that the MAs must continue to have < 1000 m² of contiguous vegetation (between the MA and adjacent lands) is considered appropriate to meet this risk control. The listing of this risk control in Schedule B of the CofC meets this requirement.

In summary, it is our opinion that the advisories in Schedule B of the CofC are sufficient for addressing the principal risk controls at the MA.





References

- MoE. 2015a. Procedure 12. Procedures for preparing and issuing contaminated sites legal instruments. BC Ministry of Environment, Victoria, BC, December, 2015.
- MoE. 2015b. Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans. BC Ministry of Environment, Victoria, BC, December, 2015.
- SNC-Lavalin. 2016a. Human Health and Ecological Risk Assessment, Areas of Environmental Concern and Management Areas Associated with Poplar Landing (Former Doman Industries Ltd. Sawmill), 1400 Quayside Drive, New Westminster, BC, prepared by SNC-Lavalin Inc., dated 2016.
- SNC-Lavalin. 2016b. 2007 to 2015 Post Remediation and Supplemental Site Assessments, Poplar Landing (Former Doman Industries Ltd. Sawmill), 1400 Quayside Drive, New Westminster, BC, prepared by SNC-Lavalin Inc., dated 2016.
- SNC-Lavalin. 2016c. Updated Evaluation of Polychlorinated Dioxins and Furans Concentrations in Soil, 1400 Quayside Drive, New Westminster, BC (BC MoE Site No. 8071), prepared by SNC-Lavalin Inc., dated 2016.

Notice to Reader

This report has been prepared and the work referred to in this report have been undertaken by SNC-Lavalin Inc. (SNC-Lavalin) for the exclusive use of **Corporation of the City of New Westminster (the City)**, who has been party to the development of the scope of work and understands its limitations. The methodology, findings, conclusions and recommendations in this report are based solely upon the scope of work and subject to the time and budgetary considerations described in the proposal and/or contract pursuant to which this report was issued. Any use, reliance on, or decision made by a third party based on this report is the sole responsibility of such third party. SNC-Lavalin accepts no liability or responsibility for any damages that may be suffered or incurred by any third party as a result of the use of, reliance on, or any decision made based on this report. Should this report be submitted to the BC Ministry of Environment (MoE) by the City, the MoE is authorized to rely on the results in the report, subject to the limitations set out herein, for the sole purpose of determining whether the City has fulfilled its obligations with respect to meeting the regulatory requirements of the MoE.

The findings, conclusions and recommendations in this report (i) have been developed in a manner consistent with the level of skill normally exercised by professionals currently practicing under similar conditions in the area, and (ii) reflect SNC-Lavalin's best judgment based on information available at the time of preparation of this report. No other warranties, either expressed or implied, are made as to the professional services provided under the terms of our original contract and included in this report. The findings and conclusions contained in this report are valid only as of the date of this report and





may be based, in part, upon information provided by others. If any of the information is inaccurate, new information is discovered, site conditions change or applicable standards are amended, modifications to this report may be necessary. The results of this assessment should in no way be construed as a warranty that the subject site is free from any and all contamination.

Any soil and rock descriptions in this report and associated logs have been made with the intent of providing general information on the subsurface conditions of the site. This information should not be used as geotechnical data for any purpose unless specifically addressed in the text of this report. Groundwater conditions described in this report refer only to those observed at the location and time of observation noted in the report.

This report must be read as a whole, as sections taken out of context may be misleading. If discrepancies occur between the preliminary (draft) and final version of this report, it is the final version that takes precedence. Nothing in this report is intended to constitute or provide a legal opinion.

The contents of this report are confidential and proprietary. Other than by the City, copying or distribution of this report or use of or reliance on the information contained herein, in whole or in part, is not permitted without the express written permission of the City and SNC-Lavalin.

We trust this provides you with the information you currently require. If you have any questions, please contact this office at your earliest convenience.

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