



April 29, 2021

Mr. Darcy Espenhain
President
Northern Electric Ltd.
4150 Versatile Place
Prince George, BC V2N 4K9
Via email: darcy@northernelectricltd.com

Dear Mr. Espenhain:

**Re: Performance Verification Plan for Certificate of Compliance
2597 Vance Road, Prince George, BC
Project No. 16078**

Keystone Environmental Ltd. (Keystone Environmental) has prepared this Performance Verification Plan (PVP) in support of an application for a risk-based Certificate of Compliance (CofC) for the property located at 2597 Vance Road, Prince George, BC (the "Site").

The PVP presents the principal risk management measures (i.e., the Schedule B key risk management controls) that apply and must remain in place at the Site to ensure that the Site CofC remains valid. The PVP was prepared in accordance with BC Ministry of Environment and Climate Change Strategy (ENV) guidance (BC ENV, 2021). The PVP was based on the findings of the Keystone Environmental (2021) report titled *Report of Findings – Human Health and Ecological Risk Assessment, 2597 Vance Road, Prince George, BC*.

DETERMINATION OF SITE TYPE

A principal risk control which must be maintained at the Site includes the following:

- Soil contamination must remain at depths greater than 1.0 metre below ground surface

This risk control was put in place to prevent exposure to soil contamination by human and terrestrial ecological receptors at the Site. The metres and bounds of the soil contamination is presented in **Figure 1**.

Based on this risk control measure for the Site, the Site is considered to be a Type 2 site. A Type 2 site is one that meets risk-based standards under current and future uses through use of institutional or engineered risk controls, apart from the risk controls included for Type 1 sites¹.

REQUIRED ACTIONS TO IMPLEMENT THE REQUIRED RISK CONTROL

The following actions are required to implement the risk control:

- Mandatory notification provided to the Site owner/operator and workers involved in site redevelopment that soil contamination must remain at depths greater than 1.0 metre below ground surface within the area of concern shown in the attached metes and bounds **Figure 1**.
- Mandatory notification provided to the Site owner/operator and workers involved in site redevelopment that if the soil contamination identified in **Figure 1** is to be removed through excavation, a qualified environmental professional should be retained to characterize the material and advise on proper soil management and disposal.
- Mandatory notification provided to the Site owner/operator to keep and maintain records of risk control maintenance as these records may be submitted to BC ENV upon request in the future.
- Mandatory notification provided to the Site owner/operator that the Director must be notified if performance verification actions indicate that there is a failure of the risk control.

Records of risk control maintenance by the Site owner/operator should include the following:

- Scheduled construction activities that have occurred within the metes and bounds.
- Description and schedule of inspection and maintenance works conducted within the metes and bounds.
- Detailed specifications on any engineering work to be implemented within the metes and bounds.
- Quantity and quality of soil or waste managed or disposed of as part of the engineered works.
- Any identified failures in risk control performance along with the measures taken to restore the risk control.

Suitable forms of record documentation include inspection records, site photo documentation, engineering details, communication documents, and related information. This documentation should be recorded at least annually until site redevelopment is complete.

¹ Type 1 sites include those that have an institutional control for limiting the presence of future drinking water wells where the site is serviced by a treated municipal water supply and/or have an engineered control of a maintained and a paved cap covering soil contamination in a municipal roadway or sidewalk.

If periodic maintenance of sub-surface works at depths greater than 8 m below grade would not occur within the metes and bounds area or those soils have been removed through excavation, then photos of the final development at the metes and bounds area and records indicating documentation that future maintenance of sub-surface works would not be required at that depth would be sufficient for performance verification.

If periodic maintenance of subsurface works (pipes, utilities etc) at depths greater than 8 m below grade within the metes and bounds area and the soil contamination remains within the metes and bounds area, then inspection/maintenance records will be needed until maintenance is not required.

SUMMARY RATIONALE

Soil contamination exceeding the CSR Schedule 3.1 commercial land use (CL) soil standards relevant to human and terrestrial ecological health are present in soils from depths ranging from 8.0 to 16.0 mbgs. The risk assessment assumed that the identified soil contamination would remain beneath a soil cap with a minimum thickness of 1.0 m to prevent potential unacceptable risks to humans and/or on-site terrestrial ecological receptors.

As the identified contaminated soils are located at considerable depth, the soil contamination does not pose unacceptable risks to human health or the environment. Therefore, an immediate risk of exposure to the soil contamination by humans, terrestrial ecological receptors, and the off-site aquatic receiving environment would not occur as long as the risk control does not become compromised. Furthermore, retaining a qualified environmental professional to advise on the proper soil management during excavation would mitigate future unacceptable risks to human health and the environment. Consequently, a contingency action plan is not proposed in this PVP.

CONCLUSION

It is our opinion that the actions identified in this report are sufficient to ensure performance verification of the risk controls required for this Site.

GENERAL LIMITATIONS

The findings presented in this report are based upon the field work conducted by Keystone Environmental for Northern Electric Ltd. Keystone Environmental has prepared this document in good faith and has relied upon information provided by others. Keystone Environmental has assumed that the information provided by third parties is both complete and accurate. This report was completed in a manner consistent with that level of care and skill normally exercised by other environmental professionals, practicing under similar circumstances in the same locale at the time of the performance of the work.

This report has been prepared solely for the internal use of Northern Electric Ltd. and for review by the BC Ministry of Environment and Climate Change Strategy pursuant to the agreement between Keystone Environmental Ltd. and Northern Electric Ltd. A copy of the general terms and conditions associated with this agreement is attached to the end of this report. By using this report,

Northern Electric Ltd. and the BC Ministry of Environment and Climate Change Strategy agree that they will review and use the report in its entirety. Any use which other parties make of this report, or any reliance on or decisions made based on it, are the responsibility of such parties. Keystone Environmental Ltd. accepts no responsibility for damages, if any, suffered by other parties as a result of decisions made or actions based on this report.

Sincerely,

Keystone Environmental Ltd.

Kevin Hall, B.Sc., R.P.Bio.
Risk Assessor

Adam Radlowski, M.Sc., R.P.Bio.
Senior Environmental Risk Assessor

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ATTACHMENTS:

- References
- Metes and Bounds Figure

REFERENCES

REFERENCES

- BC ENV. (2021). BC Ministry of Environment and Climate Change Strategy. *Performance Verification Plans*. Retrieved April 12, 2021, from <https://www2.gov.bc.ca/gov/content/environment/air-land-water/site-remediation/guidance-resources/performance-verification-plans>
- Keystone Environmental Ltd. (2021). *Report of Findings – Human Health and Ecological Risk Assessment, 2597 Vance Road, Prince George, BC*. Burnaby, BC: Keystone Environmental Ltd. April 2021.

METES AND BOUNDS FIGURE

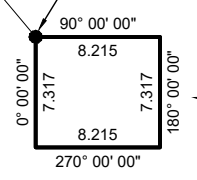


VANCE RD.

STARTING POINT

139° 59' 50"
20.070

POINT OF COMMENCEMENT



METES & BOUNDS OF SOIL CONTAMINATION

- STARTING AT THE NORTHWEST CORNER OF PARCEL A OF REFERENCE PLAN OF CONSOLIDATION OF LOT I, PLAN 24646 AND PARCEL B, PLAN 30647, DISTRICT LOT 753, CARIBOO DISTRICT, PLAN 33104:
- THENCE 139° 59' 50" FOR 20.070 METRES; TO THE POINT OF COMMENCEMENT.
- THENCE 90° 00' 00" FOR 8.215 METRES;
- THENCE 180° 00' 00" FOR 7.317 METRES;
- THENCE 270° 00' 00" FOR 8.215 METRES;
- THENCE 00° 00' 00" FOR 7.317 METRES;

RETURNING TO THE POINT OF COMMENCEMENT.

PARCEL A

HWY. #16 W.

COWART RD.

HOLLANDIA DR.

LEGEND

- PROPERTY LINE
- LOT LINES
- METES AND BOUNDS OF SOIL CONTAMINATION

NOTES:
1. THIS DRAWING IS FOR GENERAL INFORMATION ONLY.
LOT BOUNDARIES AND FEATURES ARE APPROXIMATE.



Keystone Environmental Ltd.
Ste. 320 4400 Dominion Street
Burnaby, British Columbia

2597 Vance Road
Prince George, B C

DESIGN	APPROVED
DRAWN A.B.	CHECKED
SCALE 5m 0 15m SCALE: 1:500(approx.)	

CLIENT Northern Electric	SHEET No. 1 of 1
Metes and Bounds of Soil Contamination	PROJECT No. 16078-105
	REVISION No. 00
	DRAWING No. 21-16078-01

No.	DATE	DESCRIPTION	BY	APPROVED
00	4/08/21			
REVISIONS				