

September 30, 2016

Project: 130511

Suncor Energy Products Partnership
1155 Glenayre Drive
Port Moody, BC V3H 3E1

ATTENTION: Paul Gordon
Senior Advisor, Site Remediation

REFERENCE: **Performance Verification Plan,
7855 Kingsway, Burnaby, BC
SITE ID: 6552, PID: 000-870-706**

On behalf of Suncor Energy Products Partnership (SEPP), 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 former Petro-Canada service station at 7855 Kingsway, Burnaby, BC, BC Ministry of Environment (MoE) site ID # 6552 (herein referred to as the “Property”). The PVP presents the principal risk controls that apply at the Property to ensure the Property CofC remains valid (i.e., the key risk controls of Schedule B of the CofC). The PVP was prepared in accordance with MoE Procedure 12: Procedures for preparing and issuing contaminated sites legal instruments (MoE, 2015a) and Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans (MoE, 2015b).

Principal Risk Controls

A Human Health and Ecological Risk Assessment (HHERA) was conducted for the Property, and the results presented in the SNC-Lavalin report, *Human Health and Ecological Risk Assessment, 7855 Kingsway, Burnaby, BC and Associated Management Areas*, prepared by SNC-Lavalin, dated September 29, 2016, (SNC-Lavalin, 2016a). The HHERA was prepared based on the findings and conclusions presented in the SNC-Lavalin report, *Stage 1 Preliminary Site Investigation Addendum, Detailed Site Investigation, Remedial Excavation and Post-Excavation Investigation Report, 7855 Kingsway, Burnaby, BC*, dated September 28, 2016 (SNC-Lavalin, 2016b).

The principal risk control on which the SNC-Lavalin (2016a) risk assessment was based, as presented in Schedule B of the CofC, is as follows:

- a) *Groundwater at the Property must not be used for drinking water purposes.*





Determination of Procedure 12 Remediation Type

Based on the principal risk control for the Property (i.e., the use of institutional control to mitigate/eliminate risks at the Property and lack of imminent risks in the event that the control was either not implemented or was rendered ineffective), the Remediation Type applicable at the Property 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.

A PVP is required to ensure that the principal risk control upon which the HHERA is based is being met at the Property.

Performance Verification Plan

A PVP is required to ensure that the principal risk control upon which the HHERA is based is being met at the Property.

This includes the maintenance of up-to-date records of performance verification actions and results for the Property being maintained by any purchaser, as will be referenced in the Sale Agreement. If requested by the Director, any purchaser, as will be referenced in the Sale Agreement, will provide these records to the MoE. As well, if requested by the Director, any purchaser, as will be referenced in the Sale Agreement, will provide a signed statement on whether conditions set out in this Schedule B are being met.

Performance verification actions for the Property include the following:

- a) Communication with the owner/operator that groundwater at the Property must not be used for drinking water purposes. The Property is located in a commercial/residential developed area and drinking water to the surrounding area is currently supplied by a municipal water distribution system. Consequently, groundwater is not being used as a drinking water source (including bathing/showering, cooking, gardening, drinking, etc.). Given the developed nature of the surrounding area and the presence of an alternate drinking water supply, future use of groundwater at the Property as a drinking water supply is considered unlikely.

Suncor to notify the purchaser (and purchaser, if the property is sold, will agree to take such contractual steps as are necessary to ensure any subsequent purchaser is notified) of this PVP requirement as per the terms of the Sale Agreement. No associated inspection, monitoring/maintenance or other performance verification actions are required.

Notification to the Director is required if the subject of this advisory is breached. That obligation to notify the Director will be the responsibility of the current Property owner. This requirement will be incorporated into the terms and conditions of the Sale Agreement. Pursuant to the Sale Agreement, Suncor will require the current purchaser to ensure these requirements are contractually conveyed to future owners. The listing of the risk management measure in Schedule B of the CofC meets this requirement.





Based on the above, an advisory for the Property that groundwater must not be used for drinking water purposes 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 an advisory in Schedule B of the CofC is sufficient for addressing the principal risk control at the Property.

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, 7855 Kingsway and Associated Management Areas*, prepared by SNC-Lavalin Inc., dated September 29, 2016.
- SNC-Lavalin. 2016b. *Stage 1 Preliminary Site Investigation Addendum, Detailed Site Investigation, Remedial Excavation and Post-Excavation Investigation Report, 7855 Kingsway, BC*, prepared by SNC-Lavalin Inc., dated September 28, 2016

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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





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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.

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

Prepared by:

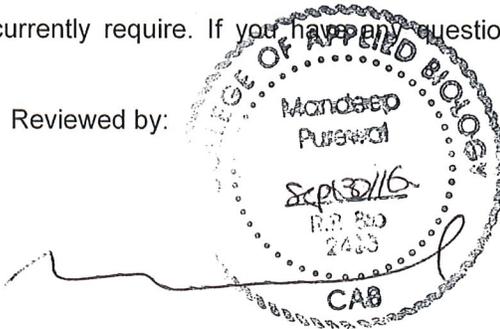
Corey G. Miller, B.Sc., A.Ag.

Project Scientist

Environment & Geoscience
Infrastructure

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enc.

Reviewed by:



Mandeep Purewal, MET, R.P.Bio., P.Ag.

Project Specialist, Risk Assessment

Environment & Geoscience
Infrastructure

