

December 23, 2016

Ref. No.: 10-7142T09

Imperial Oil Limited  
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Calgary, Alberta  
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Attention: Environmental Services

Re: Performance Verification Plan for  
1105-1119 Trans-Canada Highway North  
Golden, British Columbia  
Location No.: JF.00211

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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 property located to the west of 1105-1119 Trans-Canada Highway North in Golden, British Columbia (the subject property). The PVP presents the principal risk management measures that apply within the subject property to ensure the CofC remains 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 subject 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 the subject 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 subject property, and the results presented in the Parsons reports, "Screening Level Risk Assessment, 1105-1119 Trans-Canada Highway North, Golden, British Columbia", dated December 23, 2016. The principal risk management measures on which the risk assessment were based, as presented in Schedule B of the CofC, are as follows:

- (a) Plants with roots structures expected to extend to below 1.8 mbgs must not be planted, or allowed to become established, within the subject property.

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

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Based on the risk management measures within the subject property, (i.e. the use of institutional controls to mitigate/eliminate risks within the subject property and lack of imminent risks in the event that controls were not implemented) the Remediation Type applicable within the subject 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 ensure that the principal risk management measures upon which the risk assessment is based are met within the subject property.

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

Performance verification actions for subject property include the following:

- (a) Communication with the property owner that plants with roots structures expected to extend to below 1.8 metres below ground surface (mbgs) must not be planted, or allowed to become established within the subject property.

Based on the current absence of deep-rooting plants, the anticipated future commercial developments, and the considerable time (years) required to establish deep rooting

vegetation, imminent risks to ecological receptors are not anticipated in the event that this risk management measure was not met.

As such, an advisory for the subject property that: "plants with roots expected to extend to below 1.8 mbgs shall not be planted within the subject property" 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 my opinion that the advisories listed in Schedule B of the CofC are sufficient for the risk management measures required for the subject property.

I 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.

Handwritten signature in black ink, appearing to read "BA King".

B.A. King, P.Chem., R.P. Bio.

BAK/cer

## **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.

If site conditions or applicable standards change or if any additional information becomes available at a future date, modifications to the findings, conclusions and recommendations in this report may be necessary. Other than by Imperial Oil, 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 Parsons. Nothing in this report is intended to constitute or provide a legal opinion.

### **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.