

December 14, 2015

10-3175T07

Imperial Oil Limited  
#405 Metrotown Place III  
5945 Kathleen Avenue  
Burnaby, British Columbia  
V5H 4J7

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Attention: Environmental Services

Re: Performance Verification Plan  
798 Victoria Street  
Trail, British Columbia  
Site ID: 2728

Further to your request, Parsons Canada Ltd. ("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 at 798 Victoria Street in Trail, British Columbia (the "Property"). The PVP presents the principal risk management measures that must be applied at the Property for the CofC to remain valid (i.e. the key risk management controls of Schedule B of the CofC which must remain in place at the 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").

## BACKGROUND

A plan of the Property is provided on Drawing No. 1.

As detailed in the Detailed Site Investigation report (DSI), soil contamination of metals (arsenic, cadmium, copper, lead and zinc) was identified beneath the Property. The metals contamination is consistent with the wider area contamination in the City of Trail that was sourced from the nearby metals smelter. The remaining soil contamination was identified at depths ranging from ground surface to 2.4 metres below ground surface (mbgs). Based on soil vapour investigations conducted at the Property, conservatively attenuated vapour



concentrations did not exceed the Schedule 11 commercial land use (CL) standards for outdoor air, or for predicted indoor air concentrations for a future slab-on-grade building or existing buildings at the surrounding properties. Groundwater beneath the Property meets the standards for the protection of drinking water and freshwater aquatic life water resources.

## **PRINCIPAL RISK ASSESSMENT MANAGEMENT CONTROLS**

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A human health and ecological risk assessment (HHERA) was conducted for the Property, with the results presented in the Parsons report, "Detailed Risk Assessment, 798 Victoria Street, Trail, British Columbia (December 14, 2015)". The principal risk management measures for the Property on which the detailed risk assessment was based, as presented in Schedule B of the CofC, are as follows:

- (a) Fruit or nut-bearing vegetation is not to be established at the Property; and
- (b) Children must not reside at the Property, and structures or facilities (i.e. playgrounds, play structures, daycares, or recreational areas) that would attract children to the Property must not be constructed.

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

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Based on the risk management measures for the Property (i.e. the use of institutional controls to mitigate/eliminate risks at the Property and lack of imminent risks in the event that controls were not implemented), the Remediation Type applicable at the 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 document the principal risk management measures, upon which the HHERA is based, that must be met for the Property.

Based on consideration of current and future land use at the Property and the results of the environmental investigations performed at the Property, including the detailed risk assessment, the following performance verification actions for the Property are recommended:

- (a) Communication with the Property owner that fruit or nut-bearing vegetation is not to be established at the Property.

There are no plans by the current owner of the Property to plant fruit or nut-bearing vegetation while it remains vacant, and they have been advised that it is not permitted in the future as per the assumptions of the risk assessment and this PVP. Furthermore, fruit and nut-bearing vegetation is not typically planted in the ornamental-type landscaping that is expected to be established at the future commercial development.

As such, the following advisory for the Property is considered appropriate to meet this risk management measure: fruit or nut-bearing vegetation is not to be established at the Property. The listing of this risk management measure in Schedule B of the CofC meets this requirement.

- (b) Communication with the owner of the Property that children must not reside at the Property, and structures or facilities (i.e. playgrounds, play structures, daycares, or recreational areas) that would attract children to the Property must not be constructed.

There are no plans by the current owner of the Property to establish a playground at the Property or develop the Property into a recreational area, and they have been advised that it is not permitted in the future as per the assumptions of the risk assessment and this PVP.

As such, an advisory for the Property that “children must not reside at the Property, and structures or facilities (i.e. playgrounds, play structures, daycares, or recreational areas) that would attract children to the Property must not be constructed” is considered sufficient to meet this risk management measure. The listing of the risk management measure in Schedule B of the CofC meets this requirement.

No associated inspection, monitoring/maintenance or other performance verification actions are required for the above conditions.

In summary, it is our opinion that the advisories listed in Schedule B of the CofC are sufficient to address the principal risk management measures required for the Property.

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We 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 CANADA LTD.

A handwritten signature in black ink, appearing to read 'D.J. Williams', with a stylized flourish at the end.

D.J. Williams, P.Geo.

DJW/cer

## **LIMITATION OF LIABILITY, SCOPE OF REPORT AND THIRD PARTY RELIANCE**

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This report has been prepared and the work referred to in this report has been undertaken by Parsons for Imperial Oil Limited. It is intended for the sole and exclusive use of Imperial Oil Limited, its affiliated companies and partners and their respective agents, employees and advisors (collectively, "Imperial Oil"). Any use, reliance on or decision made by any person other than Imperial Oil based on this report is the sole responsibility of such other person. Imperial Oil and Parsons make no representation or warranty to any other person with regard to this report and the work referred to in this report and they accept no duty of care to any other person or any liability or responsibility whatsoever for any losses, expenses, damages, fines, penalties or other harm that may be suffered or incurred by any other person as a result of the use of, reliance on, any decision made or any action taken based on this report or the work referred to in this report.

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.

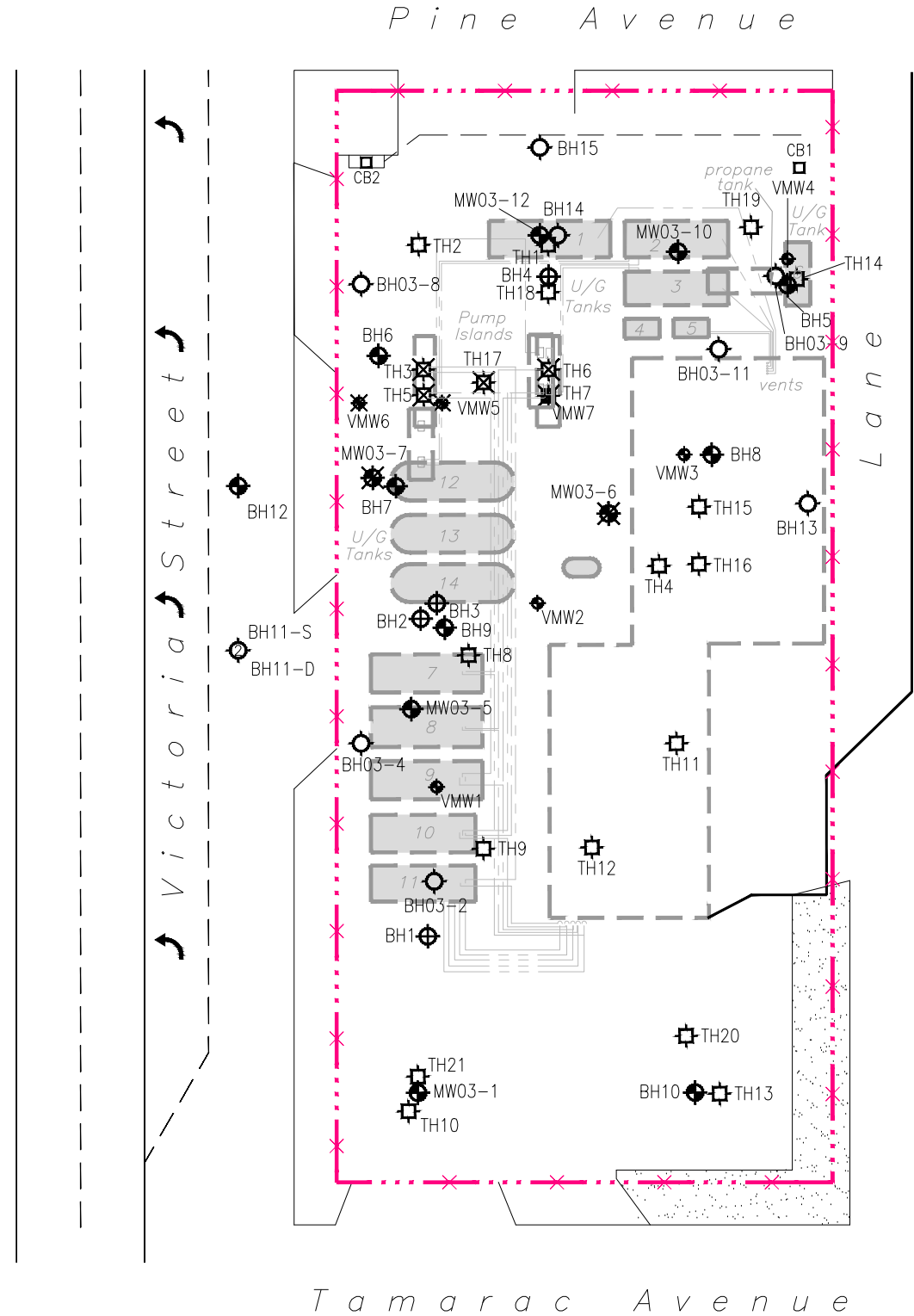
If site conditions or applicable standards change or if any additional information becomes available at a future date, modifications to the findings, conclusions and recommendations in this report may be necessary.

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### **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.

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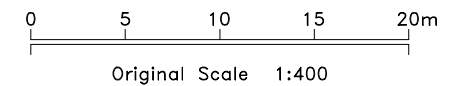
**LEGEND**

- Former feature
- x-x-x-x- Fence on property line
- 2015/01/01 Date format: yyyy/mm/dd
- ◉ Monitoring well
- Borehole
- ◉ Nested monitoring well
- ⊠ Test hole
- ◆ Vapour monitoring well
- ⊠ Destroyed monitoring well
- ⊠ Destroyed borehole
- ⊠ Destroyed test hole
- ⊠ Destroyed vapour monitoring well

**Utilities**

- ☐ Catch basin
  - Product distribution lines (removed)
- All utility lines are underground unless noted as O/H - overhead.*

Tank Chart				
Tank	Type	Capacity	Product	Status
1	Steel UST	32000 L	Regular Unleaded	Removed 1961-1982
2	Steel UST	27250 L	Mid Unleaded	Removed 1961-1982
3	Steel UST	22700 L	Premium Unleaded	Removed 1961-1982
4	Steel UST	2270 L	Used Oil	Removed 1961-1982
5	Steel UST	2270 L	Furnace Oil	Removed 1961-1982
6	Steel UST	4500 L	Used Oil	Removed 1961-1982
7	Steel UST	32000 L	Regular Unleaded	Removed 1995
8	Steel UST	32000 L	Regular Unleaded	Removed 1995
9	Steel UST	32000 L	Mid Unleaded	Removed 1995
10	Steel UST	22700 L	Premium Unleaded	Removed 1995
11	Steel UST	22700 L	Diesel	Removed 1995
12	FRP UST	32000 L	Regular Unleaded	Removed 1995-2009
13	FRP UST	32000 L	Regular Unleaded	Removed 1995-2009
14	FRP UST	32000 L	Supreme Unleaded	Removed 1995-2009
15	FRP UST	2270 L	Used Oil	Removed 1995-2009



*NOTE:*  
All features are approximate.

**Former Service Station Facilities and  
Borehole, Monitoring Well and Test Hole Location Plan**  
Imperial  
798 Victoria Street, Trail, British Columbia

Drawn: VM	Page Size: 11 x 17 in.	Ref. No.: 10-3175
Reviewed: DJW	File No.: 3175 PLAN	Date: 2015/04/21

Drawing No.: 1