



March 10, 2016

Mr. Jag Nijjar
Gateway Casinos & Entertainment Limited
4331 Dominion Street
Burnaby, BC V5G 1C7

Dear Mr. Nijjar:

**Re: Performance Verification Plan for Certificate of Compliance
7093 King George Boulevard, Surrey, BC
Site ID: 16127
Project No. 12714**

1. BACKGROUND

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 the 7093 King George Boulevard, Surrey, BC (herein referred to as 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 (MOE) Administrative Guidance 14: Performance Verification Plans, Contingency Plans, and Operations and Maintenance Plans (MOE, 2015). The PVP was based on the findings of the Keystone Environmental report (2016b) titled *Report of Findings – Human Health and Ecological Risk Assessment, 7093 King George Boulevard, Surrey, BC*.

2. PERFORMANCE VERIFICATION PLAN

2.1 Determination of Remediation Type

Based on the risk management measures for the Site, the Remediation Type applicable at the Site is considered to be Type 2 (Case 2). Remediation Type 2 Sites may require the use of engineering and institutional controls to mitigate/eliminate risks at the Site, but in the event that controls were either not implemented or were implemented but were rendered ineffective, there is a lack of imminent risks.

Under a Remediation Type 2 (Case 2) scenario, MOE (2015) indicates that a PVP is required and that an operations and maintenance plan may be required. A contingency plan is not required.

2.2 Required Risk Controls

The principal risk controls which must be maintained at the Site include the following items:

- a) Groundwater must not be used as drinking water.
- b) Future development on the Site must be limited to surface oriented (i.e., slab-on-grade) building construction.

2.3 Required Actions to Implement the Required Risk Controls

The following actions are required to implement the risk controls:

- a) Mandatory notification provided to the owner/operator of the Site that no drinking water wells are to be installed on the Site;
- b) Communication by the Site owner/operator with building designers to ensure that the construction of future enclosed buildings at the Site will be strictly limited to surface oriented structures, with no basements.

Records of these actions should be maintained by the Site owner and submitted to the MOE if requested. Other reporting requirements for all performance verification records include the following:

- The Director must be notified promptly by the person(s) responsible for the Site if performance verification actions indicate that any of the required risk controls are not being met. The following information must be submitted to the Director with the notification, or as soon as practicable thereafter:
 - The time period over which risk controls were not in place or implemented
 - The nature of the excursion(s)
 - The temporary or permanent corrective measures implemented or to be implemented
 - An implementation schedule
 - Supporting documentation

2.4 Summary Rationale

Groundwater contamination exceeding the CSR Schedule 6 drinking water standards is present at the Site. Drinking water at the Site is currently provided through municipal water lines. Groundwater at the Site is not expected to be used as drinking water in the future. A drinking water use preclusion on groundwater at the Site is needed to prevent human consumption and risk.

The DSI assumed the potential for a future surface oriented building when investigating the Site for vapour contamination. Similarly, the HHERA assumed that future buildings would have buildings with the same foundation type. In order to maintain consistency with this assumption, future buildings must be surface oriented structures, with no basements.

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

3. GENERAL LIMITATIONS AND CONFIDENTIALITY

Findings presented in this report were based upon the Preliminary Site Investigation – Stage 1 (PSI 1) and Stage 2 (PSI 2), and Detailed Site Investigation (DSI) report and the HHERA report, completed for the property located at 7093 King George Boulevard, Surrey, BC, (Keystone Environmental, 2016a; 2016b). This PVP 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 area at the time of the performance of the work.

This report has been prepared solely for the internal use of Gateway Casinos & Entertainment Limited and the BC MOE, pursuant to the agreement between Keystone Environmental and Gateway Casinos & Entertainment Limited. This report must be read as a whole and sections thereof cannot be read out of such context. Keystone Environmental Ltd. accepts no responsibility, and denies any liability whatsoever, to parties other than Gateway Casinos & Entertainment Limited and the BC MOE, who may obtain access to this report for any injury, loss or damage suffered by such parties arising out of, reliance upon, or decisions or actions based on this report, except to the extent those parties have obtained a prior written consent of Keystone Environmental to use and rely upon this report and the information contained herein. Any injury, loss or damages arising from improper use of this report shall be borne by the party making such use.

4. CLOSURE

The opinions, advice and recommendations expressed in this performance verification plan are made in accordance with generally accepted principles and practices as recognized by members of the applicable profession or discipline practising at the same time and in the same or similar locations.

If you should have any questions, please do not hesitate to contact the signatory below.

Sincerely,

Keystone Environmental Ltd.

Original signed by

Jennifer Trowell, M.ET. R.P.Bio.
Risk Assessor

Original signed by

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

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5. REFERENCES

- British Columbia Ministry of Environment. Environmental Protection Division. (2015). *Administrative Guidance 14 on Contaminated Sites: Performance Verification Plans, Contingency Plans, and Operations and Maintenance Plans*. (Version 3.0)
- Keystone Environmental Ltd. (2016a). *Report of Findings – Preliminary Site Investigation – Stage 1 and Stage 2, and Detailed Site Investigation, 7093 King George Boulevard, Surrey, BC*. Keystone Environmental Ltd. Dated March 9, 2016.
- Keystone Environmental Ltd. (2016b). *Report of Findings – Human Health and Ecological Risk Assessment, 7093 King George Boulevard, Surrey, BC*. Burnaby, BC: Keystone Environmental Ltd. Dated March 10, 2016.