



August 21, 2017

Mr. David Brogliatto
Canadian National Railway Company (CN)
CN Environment, Yard Office
Building #2, 2nd Floor, 1108 Industrial Way
Prince George, BC V2N 5S1

Dear Mr. Brogliatto:

**Re: Performance Verification Plan for Certificate of Compliance
Former Terrace Pole Dipping Facility – Off-Site Affected Parcel
(Ministry of Transportation and Infrastructure Roadways)
CN Terrace Yard, Terrace, BC
Site ID: 19778
Project No. 13062**

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 off-site affected parcel referenced as the Ministry of Transportation and Infrastructure (MOTI) roadways (the “Off-Site Affected Parcel”), and defined by the attached metes and bounds. The Off-Site Affected Parcel contains groundwater contamination associated with historical activities at the former Terrace Pole Dipping Facility, located at 3007 Kallum Street in Terrace, British Columbia (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 Off-Site Affected Parcel to ensure that the 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 (BC MOE, 2015). The PVP was based on the findings of the following report:

- Keystone Environmental (2017). *Report of Findings – Human Health and Ecological Risk Assessment, Former Terrace Pole Dipping Facility – Off-Site Affected Parcels, CN Terrace Yard, Terrace, BC*. Dated August 2017.

2. PERFORMANCE VERIFICATION PLAN

2.1 Determination of Remediation Type

Based on the risk management measures for the Off-Site Affected Parcel, the Remediation Type applicable at the Off-Site Affected Parcel is considered to be Type 2. Remediation Type 2 sites may require the use of engineering and institutional controls to mitigate/eliminate risks at the Off-Site Affected Parcel, 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, BC 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 Off-Site Affected Parcel include the following items:

- Groundwater must not be used as drinking water.

2.3 Required Actions to Implement the Required Risk Controls

The following actions are required to implement the risk controls:

- Mandatory notification provided to the owner/operator of the Off-Site Affected Parcel that groundwater wells are not to be installed and used for drinking water purposes.

Records of these actions should be maintained by the owner of the Site and the Off-Site Affected Parcel and submitted to the BC 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 Off-Site Affected Parcel 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
- If requested by the Director, a report signed by an Approved Professional must be submitted for review to the Director and must include the following (as applicable):
 - An evaluation of the performance of the institutional controls
 - Supporting documentation

2.4 Summary Rationale

Groundwater contamination greater than the Contaminated Sites Regulation (CSR) Schedule 6 drinking water (DW) standards is present on the Off-Site Affected Parcel. Drinking water is currently provided through municipal water lines. Groundwater at the Off-Site Affected Parcel is not anticipated to be used as drinking water in the future. A drinking water use preclusion on groundwater at the Off-Site Affected Parcel is needed to prevent potential human health risks associated with drinking water consumption of off-Site groundwater.

2.5 Conclusion

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

3. GENERAL LIMITATIONS AND CONFIDENTIALITY

The findings presented in this report are based upon the field work conducted by Keystone Environmental for CN. 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 CN and the review by the BC MOE, pursuant to the agreement between Keystone Environmental Ltd. and CN. By using this report, CN and the BC Ministry of Environment agree(s) to review this report in its entirety. Keystone Environmental accepts no responsibility, and denies any liability whatsoever, to parties other than CN and the BC Ministry of Environment, 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 use, reliance or decisions made based on this report by other parties without prior written approval by Keystone Environmental are the responsibility of such parties and Keystone Environmental accepts no responsibility for damages, if any, suffered by other parties as a result of decisions made or actions based on this report. The findings presented herein should be considered within the context of the scope of work and project terms of reference. The findings are time sensitive and are considered valid at the time this report was produced. The conclusions and recommendations contained in this report are based upon applicable guidelines, regulations, and legislation existing at the time this report was produced; consequently, any changes in the regulatory regime may alter the conclusions and/or recommendations.

4. CLOSURE

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

Sincerely,

Keystone Environmental Ltd.



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

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

I:\13000-13099\13062 CN Terrace\Phase 00105 - HHERA\PVPs\13062 170821 FINAL HHERA PVP MOTI.docx

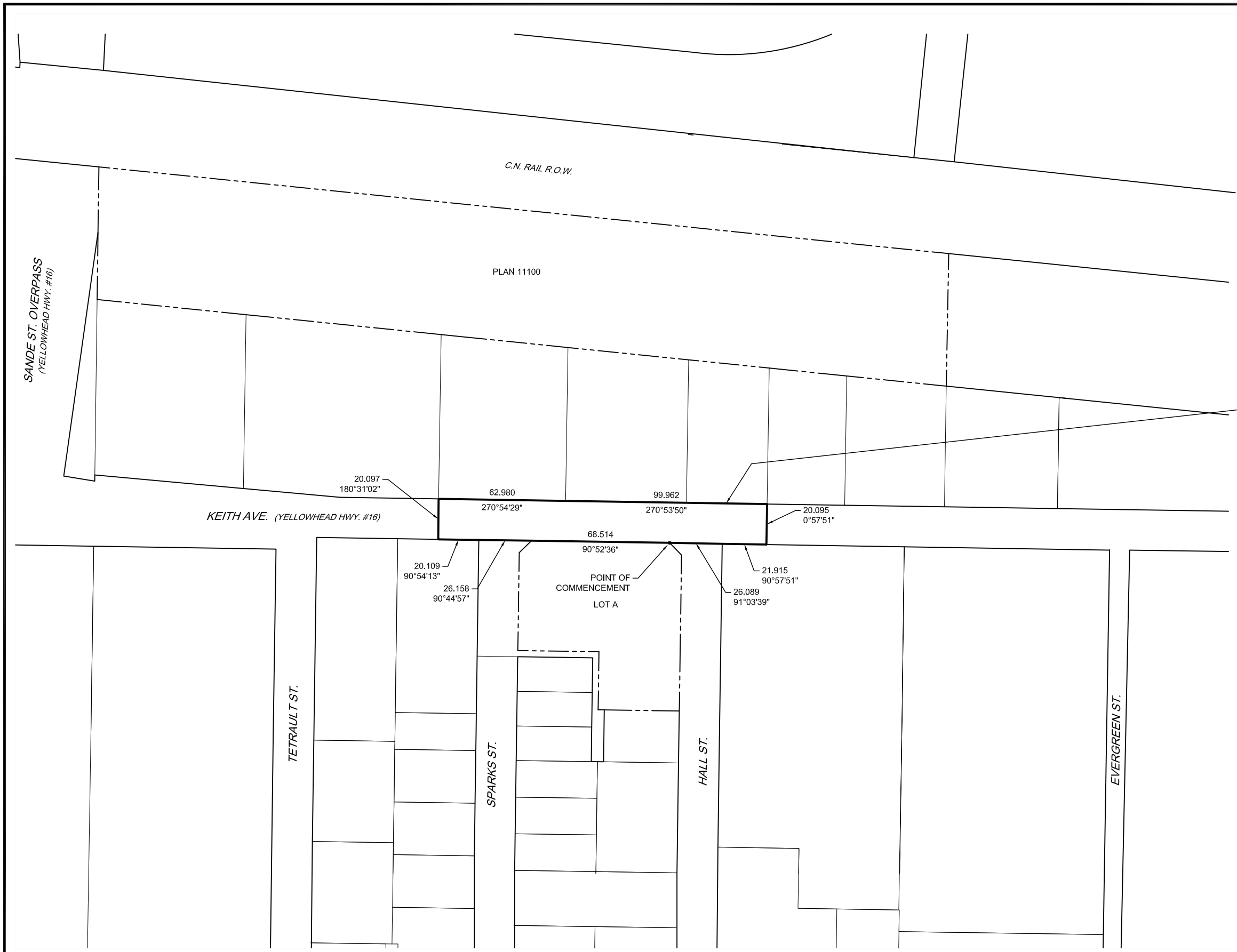
ATTACHMENTS:

- Metes and Bounds Figure
- Metes and Bounds Description

5. REFERENCES

- BC MOE (2015) British Columbia Ministry of Environment. Environmental Protection Division. *Administrative Guidance 14 on Contaminated Sites: Performance Verification Plans, Contingency Plans, and Operations and Maintenance Plans*. (Version 3.0). December 2015.
- Keystone Environmental (2017). *Report of Findings – Human Health and Ecological Risk Assessment, Former Terrace Pole Dipping Facility – Off-Site Affected Parcels, CN Terrace Yard, Terrace, BC*. Burnaby, BC. Keystone Environmental Ltd. Dated August 2017.

METES AND BOUNDS FIGURE



METES & BOUNDS OF MOTI ROADWAY:

- STARTING AT THE NORTHEAST CORNER OF LOT A OF REFERENCE PLAN OF CONSOLIDATION OF LOTS 1 AND 2, PLAN 3354, BOTH THE NORTH 1/2 AND SOUTH 1/2 OF THE EAST 1/2 OF LOT 1, PLAN 3053, LOT 1, PLAN 3369, AND CLOSED LANE, PLAN PRP 46995, ALL IN DISTRICT LOT 360, RANGE 5, COAST DISTRICT: THE POINT OF COMMENCEMENT.
- THENCE 91° 03' 39" FOR 26.089 METRES;
- THENCE 90° 57' 51" FOR 21.915 METRES;
- THENCE 0° 57' 51" FOR 20.095 METRES;
- THENCE 270° 53' 50" FOR 99.962 METRES;
- THENCE 270° 54' 29" FOR 62.980 METRES;
- THENCE 180° 31' 02" FOR 20.097 METRES;
- THENCE 90° 54' 13" FOR 20.109 METRES;
- THENCE 90° 44' 57" FOR 26.158 METRES;
- THENCE 90° 52' 36" FOR 68.514 METRES;

RETURNING TO THE POINT OF COMMENCEMENT.

LEGEND

- PROPERTY LINE
- LOT LINES
- METES & BOUNDS OF MOTI ROADWAY

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

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

CN Terrace Yard
 Terrace, B C

DESIGN	APPROVED
DRAWN A.B.	CHECKED
SCALE SCALE: 1:2000(approx.)	

CLIENT CN	DATE 3/09/17
Metes and Bounds of MOTI Roadway	SHEET No. 1 of 1
	PROJECT No. 13062-04
	REVISION No. 00
	DRAWING No. 01

No.	DATE	DESCRIPTION	BY	APPROVED
REVISIONS				

METES AND BOUNDS DESCRIPTION

**MINISTRY OF TRANSPORTATION AND INFRASTRUCTURE METES AND BOUNDS OF
OFF-SITE CONTAMINATION**

METES & BOUNDS OF MOTI ROADWAY:

- STARTING AT THE NORTHEAST CORNER OF LOT A OF REFERENCE PLAN OF CONSOLIDATION OF LOTS 1 AND 2, PLAN 3354, BOTH THE NORTH 1/2 AND SOUTH 1/2 OF THE EAST 1/2 OF LOT 1, PLAN 3053, LOT 1, PLAN 3369, AND CLOSED LANE, PLAN PRP 46995, ALL IN DISTRICT LOT 360, RANGE 5, COAST DISTRICT:
THE POINT OF COMMENCEMENT.
- THENCE 91° 03' 39" FOR 26.089 METRES;
- THENCE 90° 57' 51" FOR 21.915 METRES;
- THENCE 0° 57' 51" FOR 20.095 METRES;
- THENCE 270° 53' 50" FOR 99.962 METRES;
- THENCE 270° 54' 29" FOR 62.980 METRES;
- THENCE 180° 31' 02" FOR 20.097 METRES;
- THENCE 90° 54' 13" FOR 20.109 METRES;
- THENCE 90° 44' 57" FOR 26.158 METRES;
- THENCE 90° 52' 36" FOR 68.514 METRES;

RETURNING TO THE POINT OF COMMENCEMENT.