

November 20, 2015

Imperial Oil Limited
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Attention: Environmental Services

Re: Performance Verification Plan for
City of Penticton Lands to the North of Westminster Avenue West
Penticton, British Columbia
Location No.: 88004891/JF.00220

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 City of Penticton property located to the north of 216 Westminster Avenue West in Penticton, British Columbia (the City of Penticton Property). The PVP presents the principal risk management measures that apply within the Management Area on the City of Penticton 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 City of Penticton 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 Management Area on the City of Penticton Property, relevant to this PVP, is indicated in Schedule A of the CofC.

PRINCIPAL RISK MANAGEMENT CONTROLS

A human health and ecological risk assessment (HHERA) was conducted for the City of Penticton Property, and the results presented in the Parsons reports, "Supplemental Preliminary Site Investigation/Detailed Site Investigation/Confirmation of Remediation, 216 Westminster Avenue West, Penticton, British Columbia (November 20, 2015)" and "Risk



Assessment, 216 Westminster Avenue West, Penticton, British Columbia (November 20, 2015)". The principal risk management measures on which the risk assessment were based, as presented in Schedule B of the CofC, are as follows:

- (a) Drinking water wells must not be installed within the Management Area on the City of Penticton Property.
- (b) Plants with roots expected to extend to below 1.8 mbgs must not be planted within the Management Area on the City of Penticton Property.

DETERMINATION OF PROCEDURE 12 REMEDIATION TYPE

Based on the risk management measures within the Management Area on the City of Penticton Property, (i.e. the use of institutional controls to mitigate/eliminate risks within the Management Area on the City of Penticton Property and lack of imminent risks in the event that controls were not implemented) the Remediation Type applicable within the Management Area on the City of Penticton 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

A PVP is required to ensure that the principal risk management measures upon which the risk assessment is based are met within the Management Area on the City of Penticton 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) and (b) above are being met.

Performance verification actions for the City of Penticton Property include the following:

- (a) Communication with the City of Penticton Property owner that drinking water wells must not be constructed within the Management Area on the City of Penticton Property.

Imminent risks to drinking water receptors are not anticipated based on the following:

- the absence of drinking water wells at the City of Penticton Property and developments in the vicinity of the City of Penticton Property;

- the City of Penticton Property is utilized as a sidewalk and a roadway; and
- potable water within the City of Penticton is sourced from Okanagan Lake and Penticton Creek. To our knowledge, there are no plans to install water wells in the area of the City of Penticton Property.

As such, an advisory for the Management Area on the City of Penticton Property that drinking water wells must not be constructed within the Management Area on the City of Penticton Property is considered sufficient to meet this risk management measure. The listing of this risk management measure in Schedule B of the CofC meets this requirement.

- (b) Communication with the City of Penticton Property owner that plants with roots expected to extend to below 1.8 mbgs must not be planted within the Management Area on the City of Penticton Property.

Based on the current absence of deep-rooting plants (the City of Penticton property is largely covered by sidewalk and roadway), 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 Management Area on the City of Penticton Property that: “plants with roots expected to extend to below 1.8 mbgs shall not be planted within the Management Area on the City of Penticton 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 our opinion that the advisories listed in Schedule B of the CofC are sufficient for the risk management measures required for the City of Penticton 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 'J.A. Bright', with a stylized flourish at the end.

J.A. Bright, P.Eng.

JAB/cer

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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.

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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.