

November 15, 2016

Project: 631976

BC Ministry of Transportation and Infrastructure  
300 – 940 Blanshard Street  
Victoria, BC V8W 3E6

**ATTENTION:** Paul Savinkoff, P.Geo.

**REFERENCE:** Performance Verification Plan, Off-Site Management Area Associated with  
8099 Nordel Way (Nordel 7), Delta, BC

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SNC-Lavalin Inc. (SNC-Lavalin) has prepared this Performance Verification Plan (PVP) in support of an application for a Certificate of Compliance (CofC) for the Management Area associated with 8099 Nordel Way, located in Delta, BC (herein referred to as “the off-Site MA”). The PVP presents the principal risk controls that apply at the off-Site MA to ensure the CofC remains valid (i.e., the key risk controls of Schedule B). The PVP was prepared in accordance with Ministry of Environment (MoE) Procedure 12: Procedures for Preparing and Issuing Contaminated Sites Legal Instruments (MoE, 2015a) and Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans (MoE, 2015b).

## Principal Risk Controls

A Human Health Risk Assessment (HHERA) was conducted for the off-Site MA, with the results presented in the SNC-Lavalin report, *Human Health and Ecological Risk Assessment, 8099 Nordel Way (Nordel 7), Delta, BC* dated November 9, 2016 (SNC-Lavalin, 2016a). The HHERA was prepared based on the findings and conclusions presented in the SNC-Lavalin report, *Stage 1 Preliminary Site Investigation Update and Supplemental Detailed Site Investigation, 8099 Nordel Way (Nordel 7), Delta, BC* dated November 9, 2016 (SNC-Lavalin, 2016b).

The principal risk control on which the risk assessment was based, as presented in Schedule B of the CofC, is as follows:

- › Groundwater from the off-Site MA must not be used as a drinking water source.

## Determination of Procedure 12 Remediation Type

Based on the principal risk control for the off-Site MA (i.e., the use of an institutional control to mitigate/eliminate risks at the off-Site MA and lack of imminent risks in the event that control was either not implemented or were rendered ineffective), the Remediation Type applicable at the off-Site MA is considered to be Type 2.

Under a Remediation Type 2 scenario, MoE (2015a, 2015b) 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 control upon which the HHERA is based is being met at the off-Site MA.

This includes the maintenance of up-to-date records of performance verification actions and results for the off-Site MA being maintained by the responsible person (or their agents). If requested by the Director, the responsible person (or their agents) will provide these records to the MoE. As well, if requested by the Director, responsible person(s) will provide a signed statement on whether conditions set out in this Schedule B of the CofC are being met.

Performance verification actions for the off-Site MA include the following:

- › Communication with the owner/operator that groundwater at the off-Site MA must not be used for drinking water purposes. Drinking water for the off-Site MA and the Corporation of Delta is supplied by the municipality, through a piped distribution system. Groundwater at the off-Site MA is not being used for drinking water purposes (e.g., consumption, showering, washing, garden watering, etc.), and, given the presence of the alternate drinking water supply in the area, the future need for groundwater at the off-Site MA to be used for drinking water is considered unlikely.

Based on the above, an advisory for the off-Site MA that groundwater must not be used as a drinking water source is considered appropriate to meet this risk control. The listing of this risk control in Schedule B of the CofC meets this requirement.

In summary, it is our opinion that the advisory in Schedule B of the CofC is sufficient for addressing the principal risk control at the off-Site MA.

## References

- MoE. 2015a. Procedure 12. Procedures for preparing and issuing contaminated sites legal instruments. BC Ministry of Environment, Victoria, BC, December, 2015.
- MoE. 2015b. Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans. BC Ministry of Environment, Victoria, BC, December, 2015.
- SNC-Lavalin. 2016a. *Human Health and Ecological Risk Assessment, 8099 Nordel Way (Nordel 7), Delta, BC*, dated November 15, 2016.
- SNC-Lavalin. 2016b. *Stage 1 Preliminary Site Investigation Update and Supplemental Detailed Site Investigation, 8099 Nordel Way (Nordel 7), Delta, BC* dated November 15, 2016.



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