

June 2, 2022

10-8881

Suncor Energy Products Partnership
P.O. Box 100
1155 Glenayre Drive
Port Moody, British Columbia
V3H 3E1

Attention: Mr. C. Bogren,
Senior Advisor, Site Remediation

Dear Mr. Bogren:

Re: Performance Verification Plan for Management Area
At 236 Enterprise Avenue
Kitimat, British Columbia

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Further to your request, Parsons Inc. (Parsons) is pleased to provide this Performance Verification Plan (PVP) in support of an application for a Certificate of Compliance (CofC) for a management area (the "Management Area") within the property located at 236 Enterprise Avenue, in Kitimat, British Columbia (the "Property"). The PVP presents the principal risk management measures that apply at the Management Area to ensure that the CofC remains valid (i.e., the key risk management controls of Schedule B of the CofC which must remain in place in the Management Area). The PVP was prepared in accordance with British Columbia Ministry of Environment & Climate Change Strategy (BC ENV) guidance.

BACKGROUND

A plan of the Property, including the portion of the property designated as the Management Area, is provided on Drawing No. 1.

A human health and ecological risk assessment (HHERA) was conducted for the Property and adjacent lands, and the results are presented in the Parsons report, "*Screening Level Risk Assessment, 236 Enterprise Avenue, Kitimat, British Columbia*" (September 22, 2021). As documented in the HHERA report and the environmental status update letter (dated August 29,

2017) sent to the property owner (Carlisle Enterprises Ltd.), soil and (potentially) groundwater containing concentrations of petroleum hydrocarbon constituents and/or tetraethyl lead (TEL) exceeding the applicable regulatory standards exists beneath the Property. These remaining soils are present below approximately 2.8 metres below ground surface (mbgs) and the petroleum hydrocarbon constituents consist of benzene, toluene, ethylbenzene and xylene (collectively 'BTEX') and VPHs. The groundwater is situated below approximately 4.0 mbgs and potentially contains TEL at concentrations marginally exceeding the applicable standards.

Soil vapour sampling indicated that there are no unacceptable risks for human receptors within a building at the property with a foundation down to 2.5 mbgs, nor are there any unacceptable risks for people breathing outdoor air.

PRINCIPAL RISK ASSESSMENT MANAGEMENT CONTROLS

The principal risk management measures on which the risk assessment was based, as presented in Schedule B of the CofC, are as follows:

(a) Soil containing petroleum hydrocarbon constituents at concentrations exceeding the applicable numerical regulatory standards for the site must remain at its current depth of at least 2.8 mbgs (current grade approximately 13.1 metres above sea level) and not be redistributed to shallower depths, nor is a change permitted in future grade elevation from the current elevation that would cause current soil contamination to be situated at shallower depths.

(b) The Property is serviced by a community water supply which will be used for drinking water purposes (i.e. potable water supply wells not to be installed at the Property).

DETERMINATION REMEDIATION TYPE

Based on the risk management measures for the Management Area, (i.e. the use of institutional controls to mitigate/eliminate risks and lack of imminent risks in the event that the controls were either not implemented or were implemented but were rendered ineffective) the Remediation Type applicable for the Management Area is considered to be Type 2.

Under a Remediation Type 2 scenario, BC ENV indicates that a PVP is required.

PERFORMANCE VERIFICATION PLAN

A PVP is required to document that the principal risk management measures, upon which the HHERA is based, are being met for the Property.

Based on consideration of current and likely future land use at the Property and the results of the environmental investigations performed at the Property, including the HHERA, performance verification actions are recommended. This includes the performance verification actions outlined below. If requested by the Director, responsible person(s) or their agent(s) must provide a signed statement on whether conditions set out in Schedule B are being met.

Performance verification actions for the Property include the following:

- (a) Communication with the owner of the Property to ensure that soil containing petroleum hydrocarbon constituents at concentrations exceeding the applicable numerical regulatory standards for the site must remain at its current depth of at least 2.8 mbgs (current grade approximately 13.1 metres above sea level) and not be redistributed to shallower depths, nor is a change permitted in future grade elevation from the current elevation that would cause current soil contamination to be situated at shallower depths.

The owner of the Property has been advised that it is not permitted in the future as per the assumptions of the risk assessment and this PVP. Furthermore, as each of the buildings in the area are slab-on-grade construction, it is considered unlikely that there would be excavating deeper than 2.8 mbgs in the future. General gardening/maintenance/tilling activities typically do not exceed 1 mbgs.

As such, an advisory for the Management Area of the Property that “soil containing petroleum hydrocarbon constituents at concentrations exceeding the applicable numerical regulatory standards for the site must remain at its current depth of at least 2.8 mbgs (current grade approximately 13.1 metres above sea level) and not be redistributed to shallower depths, nor is a change permitted in future grade elevation from the current elevation that would cause current soil contamination to be situated at shallower depths” 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 owner of the Property to ensure that potable use water supply wells are not installed within the Management Area at the Property.

Based on the absence of existing potable use water supply wells in the area of the Property, and that the land use at the Property is anticipated to remain commercial and serviced with a

community water supply, an advisory for the Property that “potable use water supply wells should not be installed within the Management Area at the 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.

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 Management Area.

I 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 INC.



D.J. Williams, P.Geo.

DJW/cer

Distribution: Addressee (1)
Mr. Ron Skuggedal, Carlisle Enterprises Ltd. (via electronic mail)

LIMITATION OF LIABILITY, SCOPE OF REPORT AND THIRD PARTY RELIANCE

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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 conditions of the investigated area (subject area) observed 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 the subject area and it is based, in part, upon visual observation of the subject area, 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 conditions, portions of the subject area 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 subject area, substances addressed by this investigation may exist in areas 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 conditions of the subject area 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.

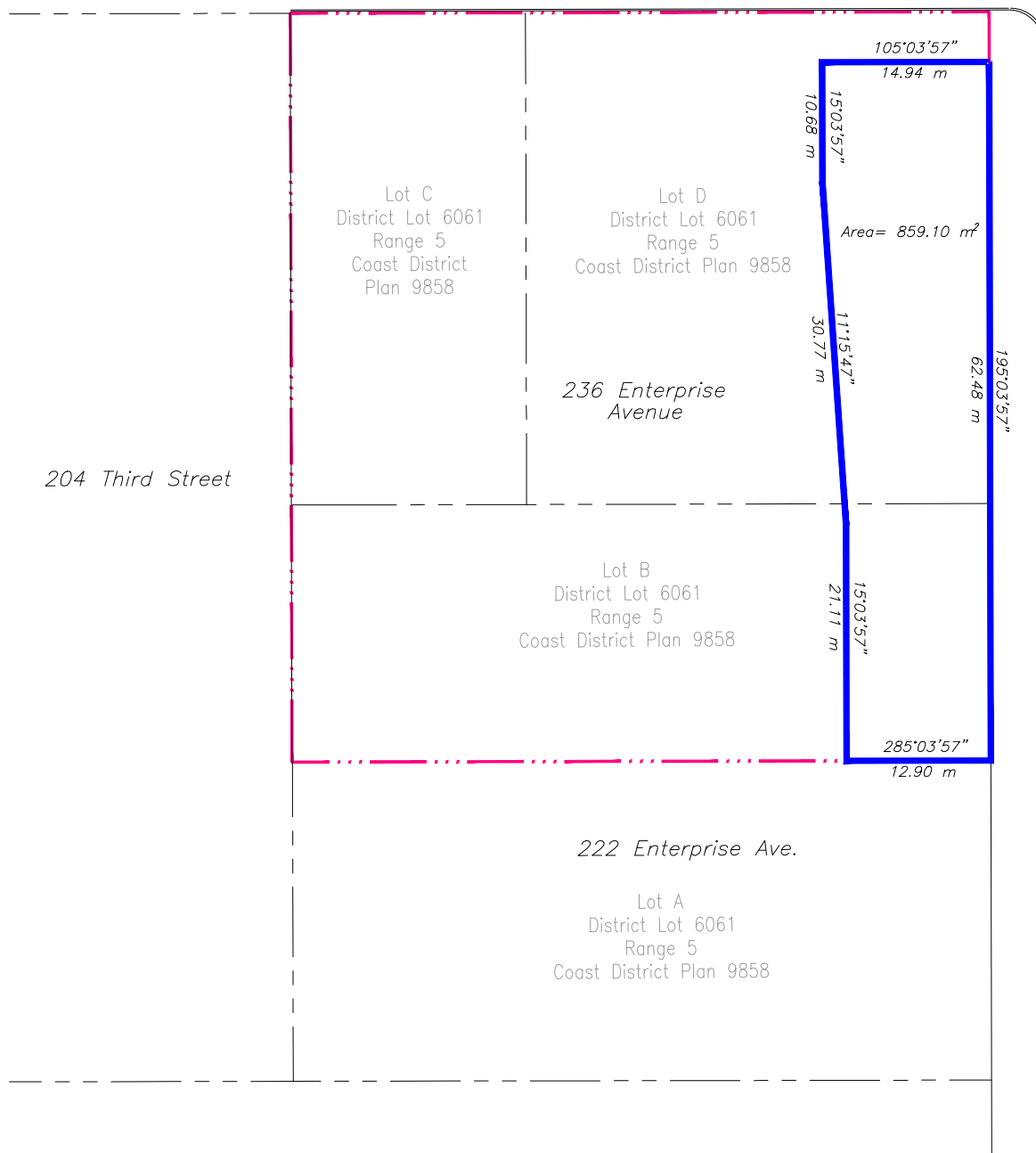
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BRITISH COLUMBIA MINISTRY OF ENVIRONMENT'S RELIANCE

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 Suncor has met their statutory obligations with respect to the Performance Verification Plan.



Third Street

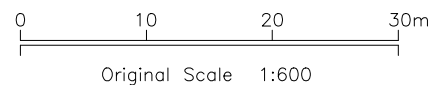


Enterprise Avenue

LEGEND

- Suncor Property line
- Legal lot boundary
- Management area

NOTE:
All features are approximate.



Management Area Suncor Energy Products Partnership Partnership 236 Enterprise Avenue, Kitimat, British Columbia	Drawn: VM/DJ/ICL	Page Size: 8.5 x 11	Ref. No.: 10-8881
	Reviewed: DJW	File No.: 8881 PLAN	Date: 2022/03/23
	PARSONS		Drawing No.: 1

04/00: 2019/07/XX VM/DJW