

November 20, 2015

Ref. No.: 10-8485T05

Imperial Oil Limited
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Attention: Environmental Services

Re: Performance Verification Plan for
248-256 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 property located at 248-256 Westminster Avenue West in Penticton, British Columbia (the AST Property). The PVP presents the principal risk management measures that apply within the Management Area on the AST 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 AST 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 AST 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 AST Property, and the results presented in the Parsons reports, "Supplemental Preliminary Site Investigation/Detailed Site Investigation/Confirmation of Remediation, 216 Westminister Avenue West, Penticton, British Columbia (November 20, 2015)" and "Risk Assessment, 216 Westminister 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) Consistent with the future land use assumptions of the vapour assessment in the Detailed Site Investigation, within the Management Area on the AST Property future developments must have a slab-on-grade foundation.
- (b) Drinking water wells must not be installed within the Management Area on the AST Property.
- (c) The grade of the Management Area within the AST Property must remain at approximately the same elevation (i.e. at least 1 m of clean soil must remain above the shallowest depth of soil and/or groundwater impacts within the Management Area on the AST Property).
- (d) Plants with roots expected to extend to below 1.8 metre below ground surface (mbgs) must not be planted within the Management Area on the AST Property.

DETERMINATION OF PROCEDURE 12 REMEDIATION TYPE

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

Performance verification actions for the AST Property include the following:

- (a) Communication with the AST Property owner that future construction must have a slab-on-grade foundation.

The assumptions in the vapour assessment and the risk assessment regarding future development were based on, and consistent with, the commercial developments on the AST Property and surrounding properties, which consist of slab-on-grade buildings.

As such, an advisory for the Management Area on the AST Property that: “future construction must have a slab-on-grade foundation” 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.

- (b) Communication with the AST Property owner that drinking water wells must not be constructed within the Management Area on the AST Property.

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

- the absence of drinking water wells at the AST Property and developments in the vicinity of the AST Property;
- the land use at the AST Property is commercial; and
- potable water within the City of Penticton is sourced from Okanagan Lake by pumping from a dedicated main, and Penticton Creek, which gets to the station via gravity. To our knowledge, there are no plans to install water wells in the area of the AST Property.

As such, an advisory for the Management Area on the AST Property that drinking water wells must not be constructed within the Management Area on the AST 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.

- (c) Communication with the AST Property owner that the grade of the Management Area within the AST Property must remain at approximately the same elevation (i.e. at least 1 m of clean soil must remain above the shallowest depth of soil and/or groundwater impacts within the Management Area on the AST Property).

The assumptions in the risk assessment regarding no direct exposure pathway to the residual contamination in soil and/or groundwater was based on the depth of the

remaining soil and groundwater impacts, and consistent with the elevation of the AST Property and surrounding properties which are at approximately the same elevations.

As such, an advisory for the Management Area on the AST Property that: “the grade of the Management Area within the AST Property must remain at approximately the same elevation (i.e. at least 1 m of clean soil must remain above the shallowest depth of soil and/or groundwater impacts within the Management Area on the AST 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.

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

Based on the current absence of deep-rooting plants (vegetation is limited to grass/small plants within the Management Area on the AST Property), 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 AST Property that: “plants with roots expected to extend to below 1.8 mbgs shall not be planted within the Management Area on the AST 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 AST 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

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 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.