

September 30, 2016

Project: 130511

Suncor Energy Products Partnership
1155 Glenayre Drive
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ATTENTION: Paul Gordon
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REFERENCE: **Performance Verification Plan,
Management Area 'A' Portion of 7877 Kingsway, Burnaby, BC**

On behalf of Suncor Energy Products Partnership (SEPP), SNC-Lavalin Inc. (SNC-Lavalin) has completed this Performance Verification Plan (PVP) in support of an application for a Certificate of Compliance (CofC) for Management Area 'A' (MA-A) located at 7877 Kingsway, Burnaby, BC (herein referred to as the "MA-A"). MA-A is located adjacent the former Petro-Canada service station at 7855 Kingsway, Burnaby, BC, BC Ministry of Environment (MoE) Site ID # 6552. The PVP presents the principal risk controls that apply at the MA-A to ensure the MA CofC remains valid (i.e., the key risk controls of Schedule B of the CofC). The PVP was prepared in accordance with 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 and Ecological Risk Assessment (HHERA) was conducted for 7855 Kingsway and MA-A, and the results presented in the SNC-Lavalin report, *Human Health and Ecological Risk Assessment, 7855 Kingsway, Burnaby, BC and Associated Management Areas*, prepared by SNC-Lavalin, dated September 29, 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 Addendum, Detailed Site Investigation, Remedial Excavation and Post-Excavation Investigation Report, 7855 Kingsway, Burnaby, BC*, dated September 28, 2016 (SNC-Lavalin, 2016b).

The principal risk control on which the SNC-Lavalin (2016a) risk assessment was based, as presented in Schedule B of the CofC, is as follows:

- a) *Groundwater at the MA-A must not be used for drinking water purposes.*





Determination of Procedure 12 Remediation Type

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

This includes the maintenance of up-to-date records of performance verification actions and results for the MA-A 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 are being met.

Performance verification actions for MA-A include the following:

- a) Communication with the owner/operator that groundwater at the MA-A must not be used for drinking water purposes. The MA-A is located in a commercial/residential developed area and drinking water to the surrounding area is currently supplied by a municipal water distribution system. Consequently, groundwater is not being used as a drinking water source (including bathing/showering, cooking, gardening, drinking, etc.). Given the developed nature of the surrounding area and the presence of an alternate drinking water supply, future use of groundwater at the MA-A as a drinking water supply is considered unlikely.

Based on the above, an advisory for the MA-A that groundwater must not be used for drinking water purposes 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 an advisory in Schedule B of the CofC is sufficient for addressing the principal risk control at MA-A.





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, 7855 Kingsway and Associated Management Areas*, prepared by SNC-Lavalin Inc., dated September 29, 2016.
- SNC-Lavalin. 2016b. *Stage 1 Preliminary Site Investigation Addendum, Detailed Site Investigation, Remedial Excavation and Post-Excavation Investigation Report, 7855 Kingsway, BC*, prepared by SNC-Lavalin Inc., dated September 28, 2016.

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