



VIA EMAIL ONLY: msk@telus.net

File: 26250-20/21156
Site ID: 21156

April 23, 2021

M28 Holdings Ltd.
500-1501 West Broadway
Vancouver, BC
V6J 4Z6

Dear Property Owner,

**Re: Protocol 6 – Request for Preapproval to Not Delineate a
Flow Through Contaminant Plume
212 East 28th Avenue, Vancouver, BC (PID: 030-552-753)**

This letter provides my decision on your March 31, 2021 application for preapproval under Protocol 6 for relief from the requirement to delineate the entire extent of PERC, TCE, cis-1,2-dichloroethylene, and vinyl chloride contamination in groundwater as it is related to off-Site sources and the property located at 212 East 28th Avenue in Vancouver, BC (the Site) is not the source of such contamination.

The Legal Description of the Site is as follows:

Lot A Block 63 District Lot 632 New Westminster District Plan EPP83322
PID : 030-552-753

A Site Location Plan is attached to this decision letter for reference (Attachment A).

In reaching my decision I have relied on the ministry's review of information provided in the following application document:

- *“Protocol 6 – Request for Preapproval to Not Delineate a Flow Through Contaminant Plume, 212 East 28th Avenue, Vancouver, BC”*, Prepared by Keystone Environmental and dated March 31, 2021.

The primary rationale and supporting information presented by Keystone in the above document is summarized as follows:

- *The identified PERC and its daughter products, TCE, cis-1,2-dichloroethylene, and vinyl chloride groundwater contamination more closely associated with dry cleaning solvents than with service stations or automotive repair operations where PERC was not used.*
- *The soil concentrations of PERC, TCE, cis-1,2-dichloroethylene, and vinyl chloride were less than the laboratory RDL. If the source of the groundwater contamination was from an on-Site release as it would migrate vertically through the shallower soil and therefore be detected in the soil samples submitted for analysis.*
- *The highest concentrations on-Site groundwater concentrations of PERC and TCE were located on the southwest portion of the Site. This investigative location is located outside of the footprint of the former on-Site service station. Higher concentrations of TCE would have been identified at MW20-5 and MW20-6 if the source of the groundwater contamination was associated with the former on-Site operations. The elevated concentrations near the southwestern edge of the property is also consistent with a contaminant plume from an off-Site source migrating through the Site.*
- *Former off-Site dry cleaning operations were historically located at 4407 and 4413 Main Street (approximately 25 m south of the Site). The concentrations of PERC and TCE decrease further north and east of MW20-6 at MW17-1, MW20-7, and MW20-16, and off-Site well MW-4) Based on the above, it is anticipated that the PERC, TCE, cis-1,2-dichloroethylene and vinyl chloride groundwater contamination identified is associated with an off-Site source.*

Based on the lines of evidence presented in the application document referenced above, I concur with the conclusions reached by Keystone that the observed PERC, TCE, cis-1,2-dichloroethylene, and vinyl chloride contamination in groundwater at the Site is sourced from a hydraulically-upgradient source property and not from activities that occurred on the Site.

I base this decision primarily on the outcome of the ministry's review and assessment of information in the submitted preapproval application which concluded the following:

1. Based on investigation results to date, identified groundwater contamination due to the specified substances at the Site appears to be sourced from an off-Site dry cleaning operation not associated with the former on-Site operations.
2. The inferred groundwater flow direction is to the north.
3. The highest concentration of PERC and TCE was identified at the southwest portion of the Site, which is located upgradient from the former on-Site service station.

In light of these findings and in accordance with current ministry policy regarding landowner responsibility for off-Site contamination not due to on-Site sources, the investigation and remediation of PERC, TCE, cis-1,2-dichloroethylene and vinyl chloride outside the Site boundary is not required to obtain a Certificate of Compliance for the above-stated property.

Please ensure that a copy of this letter is included in the Certificate of Compliance application made for the Site.

This determination is based on the most recent information available to the ministry regarding the above referenced Site. The ministry, however, makes no representation or warranty as to the accuracy or completeness of this information. The ministry expressly reserves the right to change or substitute different requirements where circumstances warrant.

If you have any questions about this letter, please contact Liliana.Jerade@gov.bc.ca or the undersigned at Alan.McCammon@gov.bc.ca.

Yours truly,



Alan W. McCammon
for Director, *Environmental Management Act*

Attachment A: Site Location Plan

cc: Curtis Lew, Keystone, clew@keystoneenvironmental.com
Liliana Jerade, ENV, liliana.jerade@gov.bc.ca
Client Information Officer, ENV csp_cio@gov.bc.ca
Sr. Professional Reliance Officer, ENV Colleen.Delaney@gov.bc.ca
CSAP Society c/o apopova@csapsociety.bc.ca

Attachment A

Site Location Plan

