



SOCIETY OF CONTAMINATED SITES APPROVED
PROFESSIONALS OF BRITISH COLUMBIA

New Member Orientation

March 7, 2023

This meeting is being conducted from the traditional, ancestral, and
unceded territory of the Coast Salish peoples,
including Squamish, Tsleil-Waututh, Musqueam

CSAPSOCIETY.BC.CA



CSAP staff



- Patricia Fu, Executive Director
- Anna Popova, Administrative Screener
- Nelly Pomareda, Operations Coordinator
- Dana Bidnall, Communications Coordinator



Board of Directors



Directors At Large (5)

Parent-organization directors (3)

- Engineers and Geoscientists of BC representative
- BC Institute of Agrologists representative
- College of Applied Biologists representative

(The eight individuals above comprise the roles of President; Vice-President, Secretary & Treasurer; and committee chairs.)

Appointed directors (4)

- Ministry of Environment and Climate Change Strategy representative
- Industry representative
- Local government representative
- Environmental representative



Committees



- Discipline
- Governance
- Membership
- Performance Assessment
- Professional Development
- Review Services
- Technical Review

We encourage participation on committees. Watch for the annual members' survey in June where you can express your interest.



Getting Started



Important documents to review in detail on the CSAP website:

- [Make a Submission](#)
- [Submission screening](#)
- [ENV templates for Certification Documents](#)
- [CSAP Practice Guidelines](#)
- [Performance Assessment Guidelines](#)

ENV website:

- Guidance and Resources - Forms: [CSSA, SoSC](#)



Making your first submission

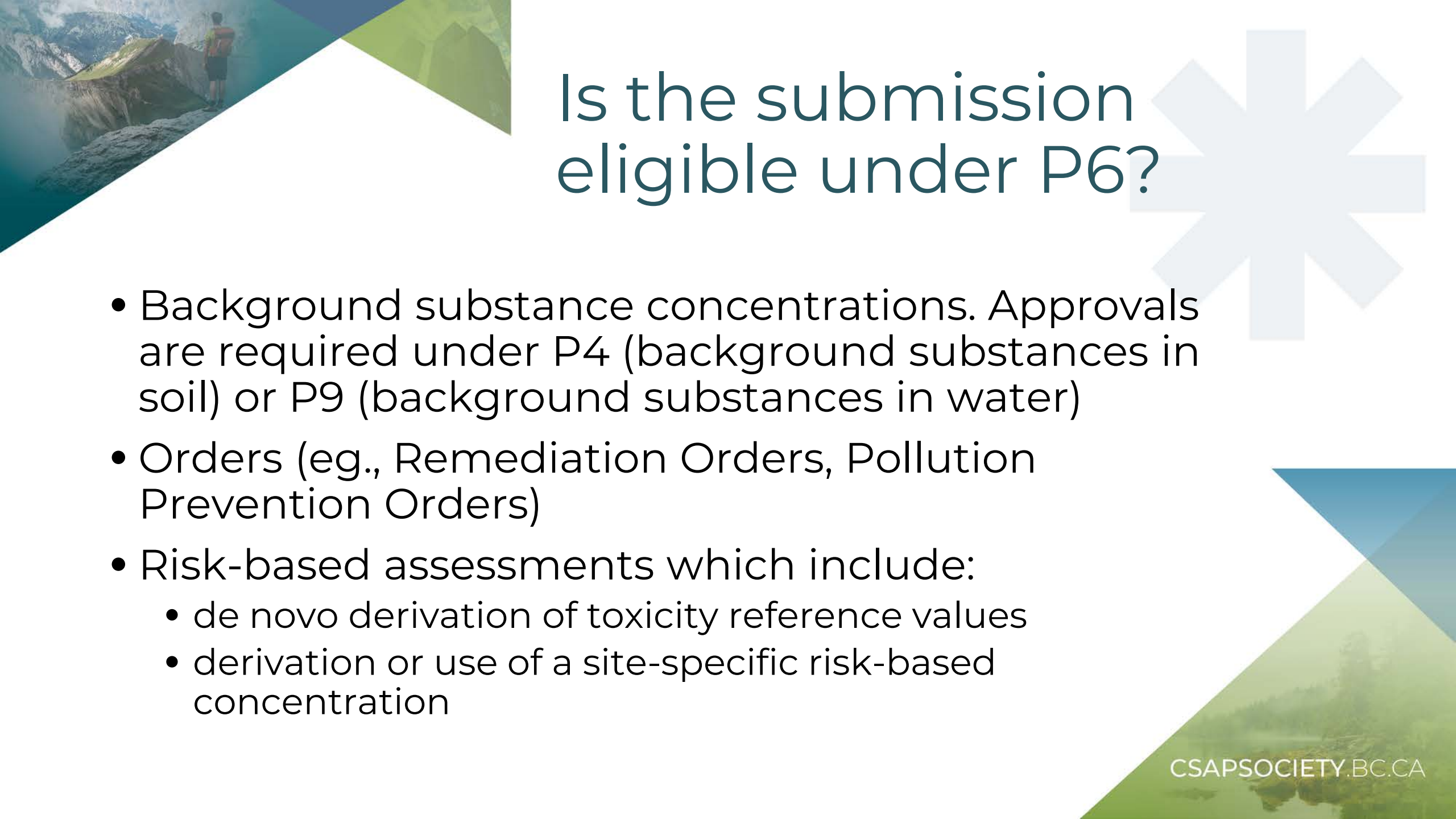


- Is the application eligible for Protocol 6 submission?
- Understanding the AP's role
- Understanding “Arm's Length” Review



Is the submission eligible under P6?

- P6 is intended for non-high-risk sites
- P6 submissions for High-Risk sites (classified under P12) require approval from ENV
- A Director's approval is required before the submission of a legal instrument application which would use any of the approaches listed on the Pre-Approvals ENV webpage.
 - *Entire extent of the area of contamination would not be delineated and/or remediated.*
 - *Wide Area Fill, Flow to/through Sites, AIP timeframe extension beyond 5 years, etc.*



Is the submission eligible under P6?

- Background substance concentrations. Approvals are required under P4 (background substances in soil) or P9 (background substances in water)
- Orders (eg., Remediation Orders, Pollution Prevention Orders)
- Risk-based assessments which include:
 - de novo derivation of toxicity reference values
 - derivation or use of a site-specific risk-based concentration



Understanding the AP's role

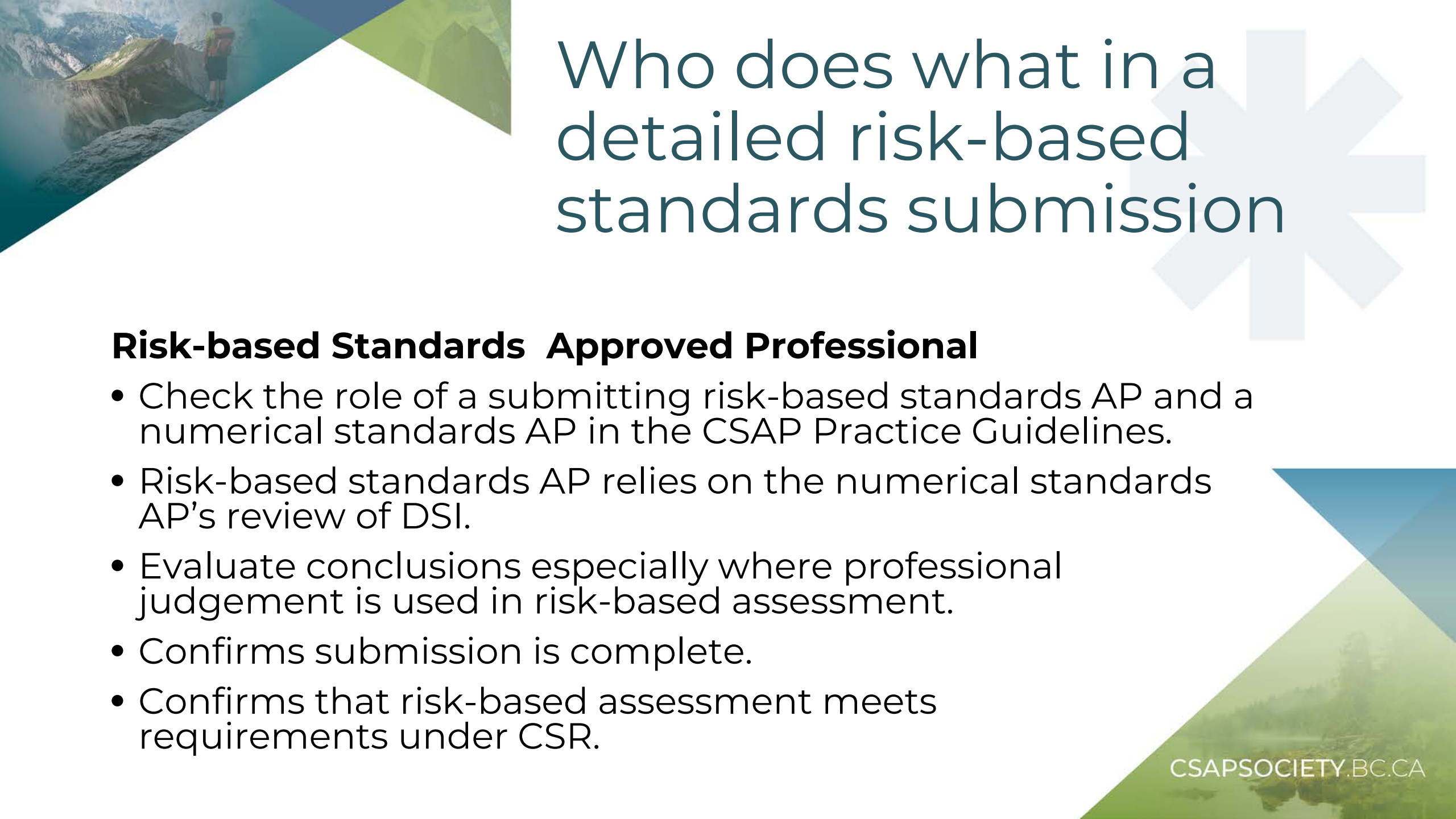
- Review submission documents prepared for Certification Document applications on behalf of ENV
- Responsible for confirming P6 eligibility
- Responsible for Arm's Length review, as required
- Responsible for assessing the adequacy of underlying investigations and remediation to confirm conclusions are supportable
- Responsible for the instrument recommendation



Who does what in a detailed risk-based standards submission

Numerical Standards Approved Professional

- Review site investigation and remediation reports for completeness and identify areas where more information or explanation is required to support conclusions and use of professional judgement.
- Confirm residual COCs, maximum concentrations, affected media and delineation for risk-based remediation.
- Confirms submission documents are accurate and complete.
- Confirms that the site investigations and remediation meet the requirements under the CSR.
- Confirms plume stability for contaminated groundwater



Who does what in a detailed risk-based standards submission

Risk-based Standards Approved Professional

- Check the role of a submitting risk-based standards AP and a numerical standards AP in the CSAP Practice Guidelines.
- Risk-based standards AP relies on the numerical standards AP's review of DSI.
- Evaluate conclusions especially where professional judgement is used in risk-based assessment.
- Confirms submission is complete.
- Confirms that risk-based assessment meets requirements under CSR.



Understanding Arm's Length



- When is Arm's Length Review Required?
 - ENV Procedure 3 (Table 1) outlines the type of applications requiring arm's length review by APs
- Summary of Site Condition (section 7.3) requires that APs indicate and sign off on the type of arm's length reviews they have completed.



Understanding Arm's Length

ENV Procedure 8 defines Arm's Length Review

- (a) the Approved Professional performing the review and any person involved in the preparation of the reviewable document **did not directly supervise or report to** the other either at the time the reviewable document was prepared or at the time of the review, and
- (b) the Approved Professional performing the review **did not participate in the preparation of the reviewable document nor give any instructions as to its preparation** except through the issuance of general guidance regarding the approach and methodology to be used in relation to the preparation of that document.



Understanding Arm's Length

CSAP Definition of Arm's Length

- A submission under P6 where the AP work consisting of a review by an AP of documents compromising the review did not participate in the preparation of the supporting documents to the submission (including preparation and execution of work plans and field work), nor give any direction as to its preparation except through the issuance of general guidance regarding the approach and methodology to be used in relation to completion and execution of the work plans and field work, and of the preparation of the supporting documents.
- CSAP has developed a letter template for Arm's Length review:
<https://csapsociety.bc.ca/submission-package-forms/>



Organizing the Submission



- Use the spreadsheets in the Practice Guidelines
- Use the ENV version of the SoSC
- CSAP transmittal letter is mandatory
- The standalone documentation listed in the transmittal letter is required by ENV and important to include
- A well-organized submission will decrease the amount of time and effort required for CSAP to conduct administrative and detailed screening as well as a Performance Assessment.



What happens at CSAP when a submission is received?

All submissions are subject to Administrative and Detailed Screening.

- Become familiar with the screening sheets posted to the CSAP website:

<http://csapsociety.bc.ca/members/guidelines/submission-screening/>



Preliminary Administrative Screening



Anna Popova is our Preliminary Administrative Screener



PAS Process



Administrative Screening

- Reviews administrative detail
 - Is the Schedule A map correct?
 - Is the site description correct and consistent?
 - Are all the necessary documents included?
 - Are site coordinates consistent?
 - Does it meet ENV requirements?
-
- If your submission is randomly selected (ratio: 1:8) for a performance assessment you will be notified within 3 working days.



PAS Process

This is completed by CSAP staff. The preliminary administrative screening checklist is available on the website and in the screening guidance

(http://csapsociety.bc.ca/wp/wp-content/uploads/Submissions-Checklist_1.pdf)

Screening issues include:

- for all submission documents use “most recent” version (SoSC, Instrument Template, Transmittal Letter, CSSA)
- definition of the Site:
 - correct Site ID
 - plan clearly showing the site location and boundaries
 - correct site latitude and longitude



PAS Process

- list of documents – these are clearly outlined in the transmittal Letter
- all documents, dated correctly, including any ENV approvals and pre-approvals
- Site registry search within the last 6 months and a Land Title search within the last 30 days
- NoIR/NoM - copies of NoIR initiation and completion



PAS Process



CCs on instrument cover letter:

- include all parties listed on title
- for determinations include mortgage holders and all with an “interest” in the property (RoW)

Substances on instruments:

- substances listed alphabetically with CAS numbers
- list separately for different water uses

PAS Tools

<input type="checkbox"/> MoE Pre-approval (Check Site Registry)	<input type="checkbox"/> Borehole Log: Disclaimer, excel, pdf, address
<input type="checkbox"/> Technical Guidance 10 (PSI Checklist) Mandatory except for Contaminated Soil Relocation Agreement and CoCs based on AIPs	<input type="checkbox"/> Technical Guidance 11 (DSI Checklist) Mandatory except for Contaminated Soil Relocation Agreements, Preliminary and Final Determinations, and CoCs after AIPs
Instrument	Reports unlocked for PA <input type="checkbox"/>
<input type="checkbox"/> Approval in Principle (Standards)	<input type="checkbox"/> PSI <input type="checkbox"/> DSI <input type="checkbox"/> Remediation Plan
<input type="checkbox"/> Approval in Principle (Risk)	<input type="checkbox"/> PSI <input type="checkbox"/> DSI <input type="checkbox"/> HHERA
<input type="checkbox"/> Certificate of Compliance STD	<input type="checkbox"/> PSI <input type="checkbox"/> DSI <input type="checkbox"/> Confirmation of Remediation
<input type="checkbox"/> Certificate of Compliance (Risk)	<input type="checkbox"/> PSI <input type="checkbox"/> DSI <input type="checkbox"/> HHERA
<input type="checkbox"/> CoC with an AIP in place	<input type="checkbox"/> Confirmation of Remediation <input type="checkbox"/> PVP
<input type="checkbox"/> Preliminary and Final Determination	<input type="checkbox"/> PSI

Initial Screening

☐ Look up **Lat, Long** to make sure it is correct

Submission Fees

☐ Correct CSAP amount ☐ Correct Ministry amount

Site plan in Schedule "A" (Part of instrument)

☐ Oriented north, clearly labelled with a north arrow ☐ Identified by continuous bold line
☐ Scale ☐ Street names ☐ No logos ☐ Not aerial plan

Location map in Schedule "A" (Part of instrument)

☐ Oriented north, clearly labelled with a north arrow ☐ Site clearly marked
☐ Scale ☐ Street names ☐ No logos

Land Title Office Records (LTO) Report - sometimes filed in PSI report

☐ Correct PID ☐ Current (within 6 months)
☐ Correct Legal Description ☐ Correct Property Owner

Area-Based Site Registry Search results Report - sometimes filed in PSI report

☐ 0.5 km radius ☐ Correct Site ID ☐ Correct Lat and Long
☐ Current (within 6 months) ☐ Correct Civic Address

Detail Site Registry Search results Report

☐ Current (within 6 months) ☐ Correct Lat and Long ☐ Correct Site ID
☐ Correct Civic Address ☐ Correct PID

Notification of Independent Remediation (not required for Determination, for risk based confirm with AP)

☐ Correct Site ID ☐ Correct Lat and Long ☐ Correct Civic Address
☐ Correct PID ☐ Correct Legal Description ☐ Signed and Dated
☐ Notice of Completion of Remediation Submitted ☐ Correct Property owner

Notification of Offsite migration

☐ Correct Site ID ☐ Correct Lat and Long ☐ Correct Civic Address
☐ Correct PID ☐ Correct Legal Description ☐ Signed and Dated
☐ Correct Property owner ☐ Communication record

Site Risk Classification (not required for Determination)

☐ Correct Site ID ☐ Correct PID ☐ Correct Lat and Long
☐ Property owner ☐ Correct Legal Desc. ☐ Correct Civic Address
☐ Exposure Pathway Questionnaire (If required by sections VI and VII of Site Risk Classification Report) ☐ Signed and Dated

Contaminated Sites Services Application Form

☐ Correct Applicant ☐ Correct Site ID ☐ Correct Legal description
☐ Correct services are chosen ☐ Correct Lat and Long ☐ Correct PID
☐ Correct Civic Address ☐ Correct Property Owner ☐ Signed and dated

Summary of Site Condition

☐ Correct Property owner ☐ Correct Site ID ☐ Correct Civic Address
☐ Correct Legal description ☐ Correct PID ☐ Correct Lat and Long
☐ Document Summary (Part 3) ☐ Section 4.7 completed
☐ Section 4.5 has complete substances list ☐ Section 7.1 and 8.2 have AP's name
☐ Signed/Dated by AP ☐ Signed/Dated by owner, lessee, or agent... (Sect 8.1)
☐ Signed/Dated by Arm's Length Reviewer (Sect 7.3). Type of review indicated
☐ Sections 4.5, 4.6, 5.2 and 5.4 - Report#, Figure# and Page# are listed (or N/A)

Cover Letter. Screen for format as well as content.

☐ Victoria File # (Detailed site registry) ☐ Site ID
☐ Addressee is applicant ☐ Civic Address
☐ CC part includes municipality, AP, CSAP, site owner, interested parties, emails.

Instrument. Screen for format as well as content.

☐ Lat and Long ☐ PID ☐ Civic Address ☐ Legal Desc. ☐ Site ID (footer)
☐ Substances used against SoSC 7.2
☐ Land use ☐ Water use ☐ Sediment use ☐ Soil vapour
 Media used against SoSC 4.4:
☐ Land use ☐ Water use ☐ Sediment use
☐ Included docs against SoSC 3.0 ☐ Confirm Legal plan #



Detailed Screening



- Reviews submission to determine completeness based on CSAP's understanding of ENV requirements
- Conducted using the Detailed Screening Spreadsheet (available at: [CSAP-Admin-and-Detailed-Screening-Guidance-18-July-2022_FINAL.pdf](https://csapsociety.bc.ca/CSAP-Admin-and-Detailed-Screening-Guidance-18-July-2022_FINAL.pdf) (csapsociety.bc.ca))



Detailed Screening

- DS Spreadsheet comprised of 5 spreadsheets:
 - **Summary Worksheet**
 - Detailed Screening Checklist Worksheet
 - Summary of Site Condition Worksheet
 - Regulatory Considerations Worksheet
 - Communications Worksheet
- Detailed Screeners (DS) review supporting documentation only, they DO NOT review reports

Detailed Screening

DS review the following:

- Contaminated Sites Services Application Form
- Draft Instrument Cover Letter
- Draft Instrument
- Summary of Site Condition
- Site Risk Classification Form.
- Technical Guidance 10 (PSI checklist)
- Technical Guidance 11 (DSI Checklist) .
- Land Title Office legal plan(s) or other land survey results
- Area Based Site Registry Search, 0.5 km radius (current search within the last 6 months)

- Detailed Site Registry Search (current report within the last 6 months)

And as applicable:

- Performance Verification Plan
- Notice of Independent Remediation (Initiation and Completion)
- Notice of Off-Site Migration
- Communication records for affected parcels
- Consent of both owners to join sites
- Typical Borehole Log
- Preapproval and Approvals required under Protocols (2, 3, 4, 6, 7 and 9)
- Other as Applicable: (e.g. covenant on land title, prior issued instruments, etc.)



Detailed Screening Process

Step 1: Upon Receiving Protocol 6 Submission

Submission is assigned a Submission Number.

Step 2: Preliminary Administrative Screening (PAS)

Admin issues resolved before the submission go to the DS (if the Submission has not been selected for a Performance Assessment).

Step 3: Detailed Administrative Screening (DAS)

The DS receives the AS (Administrative Screening) comments and electronic copies of submission supporting documents.



Detailed Screening Process

Step 4: Clarifications Requested by DS

If clarifications are required, screener sends DS spreadsheet to AS (Anna) and AS will forward the Summary Worksheet to the AP(s).

Step 5: Submitting AP responds

- Submitting AP(s) may either provide revisions or clarification.
- Response required in a timely manner.

Step 6: DS Reviews Responses or Clarifications

- Identifies that issue(s) are resolved (or not).
- If the issue(s) have been resolved, DS informs CSAP that screening is complete.



Detailed Screening Process

DS Issues are Not Resolved:

- If issues are not, DS prepares a *Summary of the Screening Issues* for review by the Detailed Screening Coordinator (DSC)
- The DSC reviews the issue(s), and as appropriate, references to the regulation, protocols and/or guidance
- If DSC agrees that further consideration is warranted, a PAC Delegated Member is assigned to conduct a Focused Review (FR).
- Submitting AP(s) are informed.

Outcomes of Focused Review:

- Issues are resolved and submission is sent to ENV.
- Issues are not resolved and indicate potential for major technical errors or regulatory omissions – DM notifies PAC and a non-random performance assessment (NRPA) is conducted.

DS Summary Worksheet

SUMMARY - CSAP DETAILED ADMINISTRATIVE SCREENING WORKSHEET

Site ID(s)									
Address									
Application #									
Instrument									
PRELIMINARY ADMINISTRATIVE SCREENING									
Issues Resolved									
AP's Response									
DETAILED ADMINISTRATIVE SCREENING									
DRINKING WATER	Applies Y/N	Comment					Reference	Notes	
DRINKING WATER	N						P21 TG6		
Does SoSC follow P21 and TG6 as applicable									
AP Response									
GENERAL TOPIC	Item	Point of Review	Yes	No	NA	Comments	Reference	Notes	
SHEET - DETAILED SCREENING CHECKLIST									
AP Response									
Screener Response									
AP Response									
Screener Response									
AP Response									
Screener Response									
AP Response									
Screener Response									
SHEET - SUMMARY OF SITE CONDITION									
AP Response									
Screener Response									
AP Response									
Screener Response									
AP Response									
Screener Response									
AP Response									
Screener Response									
SHEET - REGULATORY CONSIDERATIONS									
AP Response									
Screener Response									
AP Response									
Screener Response									
AP Response									
Screener Response									
AP Response									
Screener Response									
SHEET - CONSULTATIONS									

CSAP DS Checklist

CSAP DETAILED SCREENING WORKSHEET V2 CSAP DETAILED ADMINISTRATIVE SCREENING CHECKLIST

General Topic	Points of Review	Yes	No	NA	Comments	Reference	Notes
SITE BASICS	1 What is the type of regulatory instrument?	No answer required, this is a subject header.					
SITE BASICS	1a Preliminary Determination;						
SITE BASICS	1b Final Determination;						
SITE BASICS	1c Approval in Principle;						
SITE BASICS	1d Certificate of Compliance;						
SITE BASICS	1e Soil Relocation Agreement;						
SITE BASICS	1f Is the site part of an Environmental Management Area?						
SITE BASICS	1g Other?						
OWNERSHIP STATUS	2 Who is the site owner?						SoSC 1.
OWNERSHIP STATUS	3 Who is the applicant?						SoSC 1.
OWNERSHIP STATUS	4 Who is the agent for applicant?						SoSC 1.
OWNERSHIP STATUS	5 Is the applicant a responsible person?						"No" answer is allowed for Determinations and CoCs.
OWNERSHIP STATUS	6 Is the application for a part site (assumes that entire area of contamination is remediated and/or delineated (See SoSC 4.8))?					Proc. 6	Part sites are allowed only for AiPs and CoCs.
OWNERSHIP STATUS	7 Does the site include affected parcels? If no, move to the section on Contamination Status.						SoSC 2. If "Yes" then consultations are required (see Consultations tab). Separate SoSCs are not required but may be appropriate.
OWNERSHIP STATUS	8 Does the site include parcels with different owners?						
OWNERSHIP STATUS	9 Are there or will there be other parcels using the same Site ID number?						Decisions to combine separate parcels with the same owner should be made only after considering Procedure "Establishing the Boundaries of a
OWNERSHIP STATUS	10a Are parcels with different owners to be combined into one site?						
OWNERSHIP STATUS	10b If so, have all parcel owners agreed to this?					Fact Sheet 48	Normally instruments combining parcels with different owners into one site would not be issued unless all parties agree.
CONTAMINATION STATUS	11 Is the site high risk? (For high risk sites a pre-approval is required to allow processing under P6)						
REMEDATION STATUS	12 Have all aspects of remediation, including regulatory actions and activities to comply with numerical and/or risk-based standards, been described? In the case of an Approval in Principle issued for the site, have any required commitments or conditions been met?					CSR	SoSC 5.2.
REMEDATION STATUS	13 Have numerical standards been used?						SoSC 5.2.
REMEDATION STATUS	14a Have risk-based standards been used? If no, move to the section on Regulatory Requirements.					CSR section 18	SoSC 5.2.
REMEDATION STATUS	14b Is the site a Site Type 1 or 2 (i.e., per the ENV PVP webpage [see link in the notes column]).				Enter 1 or 2 in "Yes" column as applicable.	Protocol 1; ENV PVP Webpage	SoSC 4.6 and/or 5.1. PVPs are required for Type 2 sites; the risk controls listed in Sch B of the CoC must match those included in the PVP and in Section 5.2 of the SoSC. For details on the Site Types and PVP requirements, see: https://www2.gov.bc.ca/gov/content?id=7396B2C21886408FA258F31F118F7BAF
REMEDATION STATUS	14c Is the site a risk-managed high risk site? (For risk-managed high risk sites a pre-approval is required to allow processing under P6.)					https://www2.gov.bc.ca/gov/content?id=7396B2C21886408FA258F31F118F7BAF	
REGULATORY REQUIREMENTS	15 Does the SoSC or Site Registry Report show that NOMs have been provided to all affected parcels?						SoSC 8.1.
REGULATORY REQUIREMENTS	16 For CoC with AiP in place, has the remediation schedule been followed?						Conditions would be in Schedule B of the AiP and should be supplied by the submitting AP and reviewed.
REGULATORY REQUIREMENTS	17 Has the regulatory considerations list been reviewed? (Refer to the Regulatory Considerations tab.)						
	Are there any outstanding obligations under Part 4 of						Applicant for a CoC must provide information on compliance with all



CSAP DS Checklist

1. Site Basics
2. Ownership Status
3. Contamination Status
4. Remediation Status
5. Regulatory Requirements
6. Risk Controls (PVP/SoSC/CofC)
7. Land Titles
8. Schedule C
9. Consultation Records
10. Site Registry Records

CSAP DS Checklist

1. Remediation Status

REMEDATION STATUS	12	Have all aspects of remediation, including regulatory actions and activities to comply with numerical and/or risk-based standards, been described? In the case of an Approval in Principle issued for the site, have any required commitments or conditions been met?					CSR	SoSC 5.2.
REMEDATION STATUS	13	Have numerical standards been used?						SoSC 5.2.
REMEDATION STATUS	14a	Have risk-based standards been used? If no, move to the section on Regulatory Requirements.					CSR section 18	SoSC 5.2.
REMEDATION STATUS	14b	Is the site a Site Type 1 or 2 (i.e., per the ENV PVP webpage [see link in the notes column]).	Enter 1 or 2 in "Yes" column as applicable.				Protocol 1; ENV PVP Webpage	SoSC 4.6 and/or 5.1. PVPs are required for Type 2 sites; the risk controls listed in Sch B of the CofC must match those included in the PVP and in Section 5.2 of the SoSC. For details on the Site Types and PVP requirements, see:
								https://www2.gov.bc.ca/gov/content?id=7396B2C21886408FA258F31F118F7BAE
REMEDATION STATUS	14c	Is the site a risk-managed high risk site? (For risk-managed high risk sites a pre-approval is required to allow processing under P6.)					https://www2.gov.bc.ca/gov/content?id=7396B2C21886408FA258F31F118F7BAE	

ENV PVP webpage recently updated:

Type 1: No risk controls OR institutional controls related to DW or asphalt in municipal roadways

Type 2: All other institutional or engineering controls

CSAP DS Checklist

Schedule C (and all Sections of SoSC)

SCHEDULE C SUBSTANCES	23	Do instrument substances correspond with CSR Schedules?						Check the spelling and name of the contaminants listed on Schedule C of the instrument against the way it is presented in the corresponding CSR Schedule.
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Double check that spelling matches CSR Schedules

- Remember xylenes (Sch 3.1) vs. xylenes, total (Sch 3.2 + 3.3)
- Numbering follows chemical name (e.g., dichloroethane, 1,2-)

SoSC Worksheet

CSAP DETAILED SCREENING WORKSHEET V2 SUMMARY OF SITE CONDITIONS

General Topic	SECTION	INFORMATION REQUIRED	Yes	No	NA	Comments	Reference	Notes
GENERAL COMMENTS	1	Is information (name, firm, scope of review completed) provided about the AP making a recommendation under the CSR, if applicable?						Complete section "Scope of review completed" e.g., "Arm's Length Numerical/Risk Standards Review". List all reports that have been reviewed as part of the regulatory submission. Such a list may include the Stage 1 PSI, Stage 2 PSI, DSI, CoR, HHERA and PVPs as appropriate. If there is a PVP, it must be included in the scope of the RA review.
GENERAL COMMENTS	1a	Numeric AP						
GENERAL COMMENTS	1b	Risk AP						
Document Summary	3	In addition to the reports and plans listed in this section (site investigations reports, risk assessment reports, remediation plans, confirmation of remediation reports and supporting correspondence), if the following exist they should also be listed:						
Document Summary	3a	performance verification plans;					Performance verification plans - Province of British Columbia (gov.bc.ca)	For risk-based CoCs: Except for Type 1 sites a PVP is required in the application package and Schedule B of the CoC must have its principal risk controls listed.
Document Summary	3b	approvals and preapprovals under protocols (e.g., 2-4, 6, 7, and 9) to establish, for example, background levels of substances and site-specific standards;						ENV Website: PVP Pre-approval is required for a P6 recommendation of a high risk site.
Document Summary	3c	determinations of land, water, sediment or vapour use by a Director;						
Document Summary	3d	discharge authorizations issued for works at the site under section 6 of the Environmental Management Act;						
Document Summary	3e	hazardous waste authorizations applicable to the site issued under the Environmental Management Act and Hazardous Waste Regulation.						
Investigations Completed		This section should include all investigations completed.						These are investigations and should not include risk assessment as it is remediation (include in Section 5). Some such cases may require preapproval. This section may refer to SoSC 4.8 for more detailed information or rationale.
Investigations Completed	4.1	Are details regarding site investigations that may not be consistent with ENV guidance (e.g., incomplete delineation) briefly noted?						
Site Conditions	4.2	This section should include site-specific information and sound rationale supporting the applicable water use standard proposed for the site. In addition to the hydrogeology information currently requested in this section, explicit statements/descriptions to support the Protocol 21, "Water Use Determination" for current and future water use should also be presented under "Hydrogeology".					P21, TG6	All water uses must be addressed.
Site Conditions	4.2a	Is sufficient information present in the SoSC to determine if applicable water use standards have been selected?						See annotated SoSC for detailed list of required information.
Site Conditions	4.2b	Surface water features: have the direction and distance to nearest surface water bodies and the characteristics (e.g., relative size/flow) of the fresh or marine water body been provided?						
Applicable Numerical Concentration Standards and Criteria	4.4	if more than one land or water use applies to the site, expand this section to specify additional land uses covered by the document, i.e. riparian areas, roadways, etc. Include a diagram to clearly show the area(s) with different standards						
Applicable Numerical Concentration Standards and Criteria	4.4a	Soil (CSR Schedule 3.1): - If Other is specified above, (e.g. WLN, WLR, applicable or excluded guidance, protocols or policies specific to the site) is it clearly explained						



SoSC Worksheet

1. General Comments
2. Document Summary
3. Investigations Completed
4. Site Conditions
5. Applicable Numerical Standards
6. APEC and PCOC Summary
7. AEC and Contaminant Summary
8. Investigation or Interpretation Issues
9. Proposed Remedial Activities
10. Summary of Remediation Plan
11. Summary of Contaminant Treatment and Removal
12. Summary of Residual Contamination
13. Substances Remediated and Standards/Criteria

SoSC Worksheet

Site Conditions



Site Conditions	4.2	This section should include site-specific information and sound rationale supporting the applicable water use standard proposed for the site. In addition to the hydrogeology information currently requested in this section, explicit statements/descriptions to support the Protocol 21, "Water Use Determination" for current and future water use should also be presented under "Hydrogeology".	P21, TG6	All water uses must be addressed.
Site Conditions	4.2a	Is sufficient information present in the SoSC to determine if applicable water use standards have been selected?		See annotated SoSC for detailed list of required information.
Site Conditions	4.2b	Surface water features: have the direction and distance to nearest surface water bodies and the characteristics (e.g., relative size/flow) of the fresh or marine water body been provided?		



Include all water uses



Address both current and future use



Include sufficient details to show compliance with P21 for every geological unit exempted from a water use

SoSC Worksheet

Applicable Numerical Standards

Applicable Numerical Concentration Standards and Criteria	4.4	if more than one land or water use applies to the site, expand this section to specify additional land uses covered by the document, i.e. riparian areas, roadways, etc. Include a diagram to clearly show the area(s) with different standards				
Applicable Numerical Concentration Standards and Criteria	4.4a	Soil (CSR Schedule 3.1): - If Other is specified above, (e.g. WLN, WLR, applicable or excluded guidance, protocols or policies specific to the site) is it clearly explained				
Applicable Numerical Concentration Standards and Criteria	4.4b	Vapour (CSR Schedule 3.3): - if other is specified above, include description of assumptions for both current and future development of the site that the selected vapour attenuation factors are based on. Has other been selected and sufficient information provided.				P22
Applicable Numerical Concentration Standards and Criteria	4.4c	Do the selected applicable standards make sense considering the current and future land use?				

Vapour (CSR Schedule 3.3): (Check all that apply)

	AL, PL, RL	CL	IL	Parkade	Other
Soil Vapour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes (if other is specified above, include description of assumptions for both current and future development of the site that the selected vapour attenuation factors are based on)					

- For vapour, ensure both current and future use are addressed and provide details on how VAFs selected

SoSC Worksheet

Applicable Numerical Standards

Soil (CSR Schedule 3.1):

Property	CSR Land Use	CSR Land Use						
		AL	PL	RL _{LD}	RL _{HD}	CL	IL	Other
Subject Site	Current	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Proposed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Receiving site (if completed in support of a Contaminated Soil Relocation Agreement)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Offsite impacted property / management area		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has a Protocol 2 (site-specific) or Protocol 4 (background) standard been applied?		Yes <input type="checkbox"/> No <input type="checkbox"/>						

Substances ~~remediated~~ **evaluated** in soil for Residential soil use:

To meet local background concentrations:

<List substances remediated to meet local background concentrations.>



Include substances evaluated to background or P2 Site-Specific Standards (SSS) in SoSC (Section 4.4 and 4.6) and in CofC



Suggest including in Section 4.6 of SoSC with note indicating evaluated to background or SSS (i.e., not carried forward as a COC)



Revise template text on Sch C of CofC to indicate evaluated to background or SSS (vs. remediated)

SoSC Worksheet

AEC and Contaminant Summary

				Extent of Contamination			
AEC / APEC # (Use same #s as for APECs in Table above)	Contaminant of Concern	Medium (e.g., soil, groundwater, sediment, vapour, surface water, other)	Maximum Measured Concentration (indicate units)	Area (m ²)	Depth Range (m)	Add	Delete
						+	-
						+	-
Notes (e.g. site type, classification, relevant approvals etc.):							



Include Site Type (i.e., Type 1 or Type 2 for risk-based submissions)



Include the Site Risk Classification



Include background soil or groundwater levels set under P4 or P9, or SSS

SoSC Worksheet

Summary of Remediation Plan
Summary of Contaminant Treatment and Removal
Summary of Residual Contamination
Substances Remediated and Standards/Criteria

Summary of Remediation Plan	5.3	Substances which meet applicable numerical vapour standards after the application of appropriate attenuation factors should not be listed, as they would not have been remediated					Annotated SoSC
Summary of Remediation Plan	5.3a	Is the list of substances a sub-set of the above Section 4.6 list?					
Summary of Contaminant Treatment or Removal	5.4	Is the list of substances a sub-set of the above Section 5.3 list?					Annotated SoSC
Summary of Residual Contamination after Remediation	5.5	Is the list of substances a sub-set of the above Section 5.3 list?					Annotated SoSC
Summary of Residual Contamination after Remediation	5.5a	Does this list include substances that have been assessed to meet risk standards?					
Substances Remediated and Standards or Criteria	7.2	Check this list against the instrument. Is it clear which substances were evaluated verses remediated if P2, P4 and P9 standards have been used?					



Each section should be a sub-set of the previous



Check section 7.2 against Schedule C of the CofC and ensure P2 SSS, P4 and P9 are included if used



Check spelling against CSR Schedules

Regulatory Considerations

General Topic	Points of Review	Yes	No	NA	Comments	Reference	Notes
OUTSTANDING OBLIGATIONS	1 Have the following obligations in association with the parcel under the contaminated site provisions of EMA been met?	No answer required, this is a subject header.					
OUTSTANDING OBLIGATIONS	1a Site Disclosure Statement requirements (including freeze and release						Site Registry Detail Report
OUTSTANDING OBLIGATIONS	1b Site Investigation Order or requirements imposed;						
OUTSTANDING OBLIGATIONS	1c Remediation Order requirements; and						
OUTSTANDING OBLIGATIONS	1d Contaminated soil relocation agreement requirements?						SoSC Sections 6.1 and 6.2
APPROVAL REQUIREMENTS	2 Have approval requirements been met under the following protocols?	No answer required, this is a subject header.					
APPROVAL REQUIREMENTS	2a Protocol 2 (site-specific standards);					Protocol 2	SoSC Sections 3.1 and 3.2
APPROVAL REQUIREMENTS	2b Protocol 3 (blending of non-hazardous waste);					Protocol 3	
APPROVAL REQUIREMENTS	2c Protocol 4 (background soil values);					Protocol 4	SoSC Sections 3.1 and 3.2
APPROVAL REQUIREMENTS	2d Protocol 6 Pre-approvals (Part of a site, wide area fill, flow through to sites, relaxation on delineation, background sediment/vapour/surface water, ENV Orders);					Protocol 6	
APPROVAL REQUIREMENTS	2e Protocol 9 (background groundwater values);					Protocol 9	
APPROVAL REQUIREMENTS	2g Protocol 21 (water use determination).					Protocol 21	
OTHER REQUIREMENTS	3a Have other non-Protocol approval requirements been met?						Applicant for a CoC must provide information on compliance with all conditions such as those that may be in an AiP.
OTHER REQUIREMENTS	3b Is submission eligible under Protocol 6?					Protocol 6	
OTHER REQUIREMENTS	3c Have requirements for land, water, sediment, and/or vapour use rulings for the Site by a Director been met?						Approvals by the director can have conditions which must be met
NOTICE SUBMISSIONS	4 Have the requirements been met for the following submissions?	No answer required, this is a subject header.					
NOTICE SUBMISSIONS	4a Notification of Likely or Actual Migration;					Protocol 17	SoSC Sections 4.7 and 8.1, BC ENV Migration Checklist
NOTICE SUBMISSIONS	4b Notification of Independent Remediation;					ENV Forms	SoSC Section 5.2
NOTICE SUBMISSIONS	4c Site Risk Classification Report; and					Protocol 12	(Generally from Site Detail Report and Screening Documents)
NOTICE SUBMISSIONS	4d Summary of Site Condition.					CSR Sch 1.1	
NOTICE SUBMISSIONS	4e Have public consultation and review requirements been met?						
NOTICE SUBMISSIONS	4f Is follow-up in place to requirements imposed (by the director) when independent remediation is being done, under section 54 (3) (d)?					EMA Section 54 (3) (d)	
CONTAMINATED SITES LEGAL INSTRUMENT CONDITIONS	5 Have the following conditions imposed in a contaminated sites legal instrument (either issued previously or to be issued) been met:	No answer required, this is a subject header.					
CONTAMINATED SITES LEGAL INSTRUMENT CONDITIONS	5a Covenant requirements;						Transmittal Letter
CONTAMINATED SITES LEGAL INSTRUMENT CONDITIONS	5b Security requirements;					Protocol 8	
CONTAMINATED SITES LEGAL INSTRUMENT CONDITIONS	5c Monitoring requirements;						
CONTAMINATED SITES LEGAL INSTRUMENT CONDITIONS	5d Reporting requirements; and						
CONTAMINATED SITES LEGAL INSTRUMENT CONDITIONS	5e Record keeping requirements?						

Consultations Worksheet

General Topic	Points of Review	Yes	No	NA	Comments	Reference	Notes
Notification of Migration	1 Where a source parcel responsible person is applying for an AIP or CoC for the source parcel and one or more affected parcels they must provide a satisfactorily completed Notice of Likely or Actual Migration (NOM) (PDF, 142 KB) to the affected parcel owner and the ministry where required under Sections 57 and 60.1 of the Contaminated Sites Regulation (CSR). Once a NOM is sent, the responsible person for the source parcel should send a registered letter to each affected parcel owner with the following:	No answer required, this is a subject header.					The source parcel owner is expected to provide to the affected parcel owner in writing by registered letter, the information shown in the Communication Expectations page. If a written response is not received from the affected parcel owner within 30 days, the ministry expects the source parcel responsible person to contact the affected parcel owner again, this time by telephone, e-mail or in person requesting a response to the original communication. After making initial contact, the source parcel responsible person should request a response to the registered letter within an additional 30 days from the time of the telephone, e-mail or personal contact.
	1a A request for comments and concerns about the results obtained to date, the work done and proposed work at the source and affected parcels relevant to the source parcel					Communications	
	1b A declaration that the source parcel owner intends to seek certification document(s) for the source and affected parcels, and a description of the types of documents sought and to which parcels they apply						
	1c The name of the firm preparing the draft document(s) as well as the contact at the firm (name, address, phone number, e-mail address, etc.)						
	1d Who will be working with the affected parties (for example, the owner, operator, their agent (consulting firm, etc.) and their names, addresses, phone numbers, e-mail addresses)						
	1e A detailed report, including figures, describing the work done and results obtained to date at the source and affected parcels						
	1f A statement for both the source and affected parcel as to whether they are classified or would likely be classified as high risk or non-high risk						
	1g A copy of the draft certification document for the affected parcel.						
Combining Parcels	2 If combining the source parcel with the affected parcel into one Certificate of Compliance or Approval in Principle The responsible person for the source parcel must provide to the ministry:	No answer required, this is a subject header.					
	2a A written request for agreement between the source parcel and affected parcel owners with a proposal to combine parcels with different ownership for the purpose of the certification document					Communications	
	2b A request for a response in writing with comments from each affected parcel owner within 30 days of delivery of the letter which requests the written agreement described above (Note, the written comments by the source and affected parcel owners may be required to be provided to the ministry)						
Communications Regarding Uncooperative Parcel Owners	3 If the source parcel has contaminated several neighbouring parcels and not all the affected parcel owners have been cooperative	No answer required, this is a subject header.					
	3a The responsible person for the source parcel must provide to the ministry a statement indicating that the source parcel has contaminated several neighbouring parcels and some, but not all of the affected parcel owners have allowed access to their lands for site investigations; and that a certification document is expected to be issued for the source parcel and any affected parcel with owners who have allowed such access.					Communications	
Communications Regarding Approvals in Principle	4 If an Approval in Principle is requested. For each affected parcel to receive an Approval in Principle, the responsible person for the source parcel must provide to the ministry the following:	No answer required, this is a subject header.					
	4a A summary description of the remediation strategy (for example, excavation and disposal, monitored natural attenuation, risk management) and schedule proposed. Also include:					Communications	
	4b The assumptions of any risk assessment (for example, exposure pathway assumptions for soil, water and vapours) for the affected parcel under present and reasonably anticipated future uses						
Communications Regarding Approvals in Principle and Certificates of Compliance	5 If either an Approval in Principle or Certificate of Compliance will be requested. For each affected parcel to receive an Approval in Principle or Certificate of Compliance, the responsible person for the source parcel must provide to the ministry the following additional information:	No answer required, this is a subject header.					
	5a Any restrictions and parcel access requirements that would apply upon issuance of the certification document for the affected parcel related to ongoing risk management activities necessary to satisfy risk-based remediation requirements (for example, restrictive covenants, drinking water use restrictions, commitment to operate and maintain works, or other conditions)					Communications	

Consultations Worksheet

- Recent guidance from ENV:
 - Detailed communication summaries must be provided with submission
 - If no response received: attempts should be made to contact the recipients to ensure that the communications were received and if they had any outstanding concerns
 - 30 days + 30 days is intended to be guidance for communications with off-Site parties, but ENV expects that every reasonable attempt should be made to communicate and address any concerns.

Summary

- Complete ENV docs will avoid delays during Detailed Screening
- Watch for consistency across SoSC and CofC (and PVP for risk-based submissions)
- Use the Annotated SoSC as guidance and share with QPs who are completing the forms
 - New version will be prepared when new ENV version available



Performance Assessment



How a Performance Assessment Works



Two types of Performance Assessments

- Random PAs are conducted on 1:8 submissions
- Non-random PAs
 - Resubmission of deficient submission
 - Unresolved issues from detailed screening and focused reviews
 - Disciplinary measures
 - Requested by ENV or CSAP Board



The PA is completed by a Panel and a DM(s)

- DM - Delegated Member sits on PAC
- Numerical Standards PAs consist of a DM and 2 panel members
- Detailed Risk-based Standards PAs include both a numerical and risk DM and 2 numerical and 1-2 risk panel members



Steps in the PA process

Getting Started

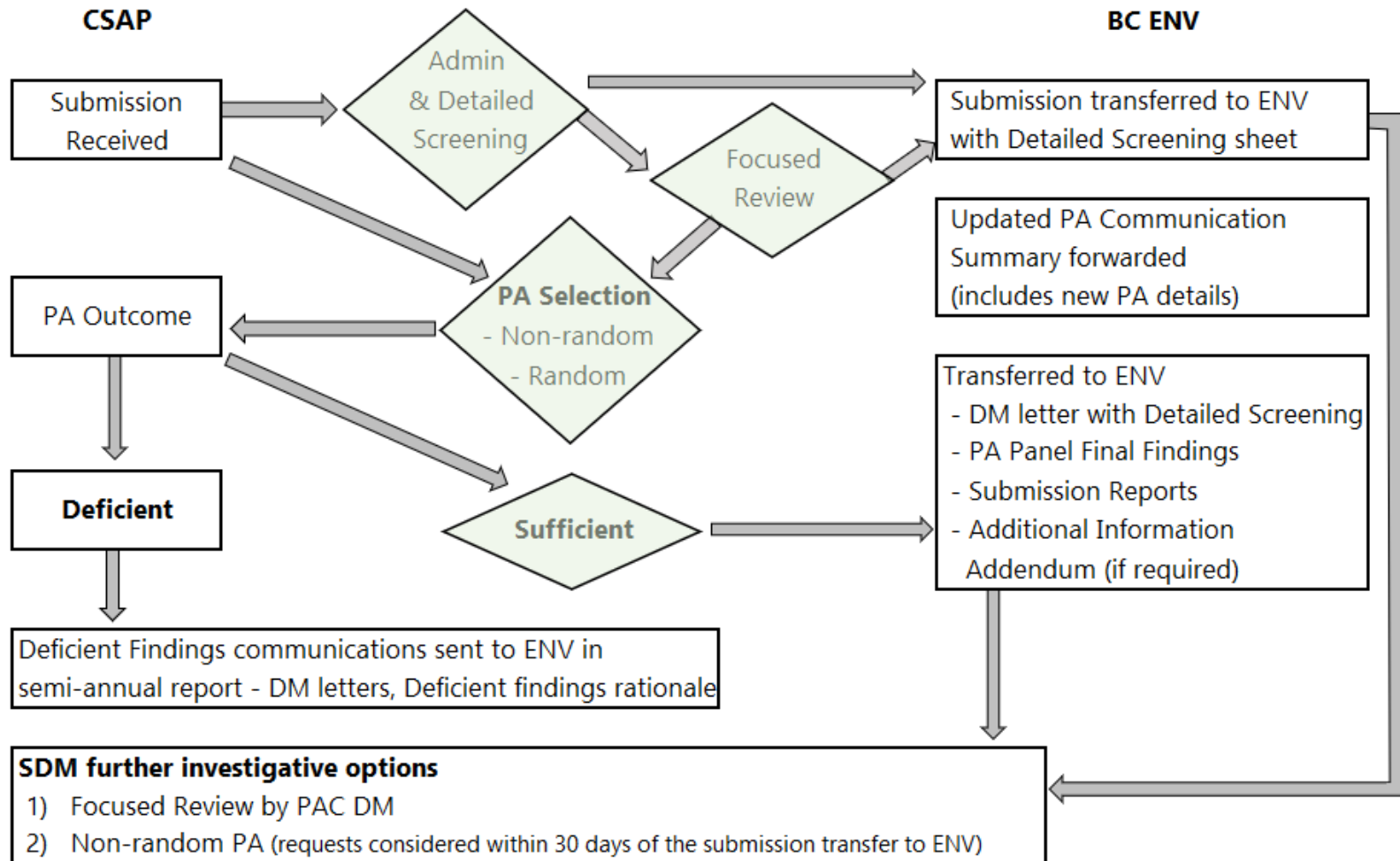
- AP notification – electronic submission is reviewed to confirm all required files are included
- All figures and drawings larger than 11”X17” must be provided in hard copy
- Administrative screening is initiated and substantially complete prior to start of PA

PA underway

- Submission files are added to the PA drop box for easy access by the PA DM(s) and panel members
- The DM conducts the detailed screening and provides findings to the panel members

Steps in the PA process

PA selected - submission randomly selected for a PA





Steps in the PA process - Stage 1 Reports

- Panel members review the submission documents and prepare a Stage 1 Findings report
- Possible outcome - sufficient finding or requires additional information
- PA Timelines for Stage 1 Findings:
 - 10 days for a Numerical Standards PA
 - 15 days for a Risk-based Standards PA
- If additional information is required, the submitting AP has 2 months to submit an addendum



Why meet with the PA Panel?

- Where additional information is required, the PAC recommends that the submitting AP meet with the DM(s) and panel
 - Meeting to be requested within 1 month of Stage 1 Findings
 - Draft addendum to be prepared for the meeting
- Why meet?
 - Interpretation, is a big factor in AP work and it is important to make sure that everyone is on the same page.
 - Meeting with the DM and panel members provides an opportunity to explain rationale and seek clarification.
 - APs can revise their addendum before finalizing to ensure that the appropriate information is brought forward.



Steps in the PA process - Final Findings

- Final Addendum is reviewed according to PA Guidelines Table 1: Process Clarification Chart.
- Main Considerations:
 - Does the addendum information support the original conclusions
 - Is the scope of additional work limited compared to the original scope
- PA Timelines for Final Findings:
 - 10 days for a Numerical Standards PA
 - 15 days for a Risk-based Standards PA

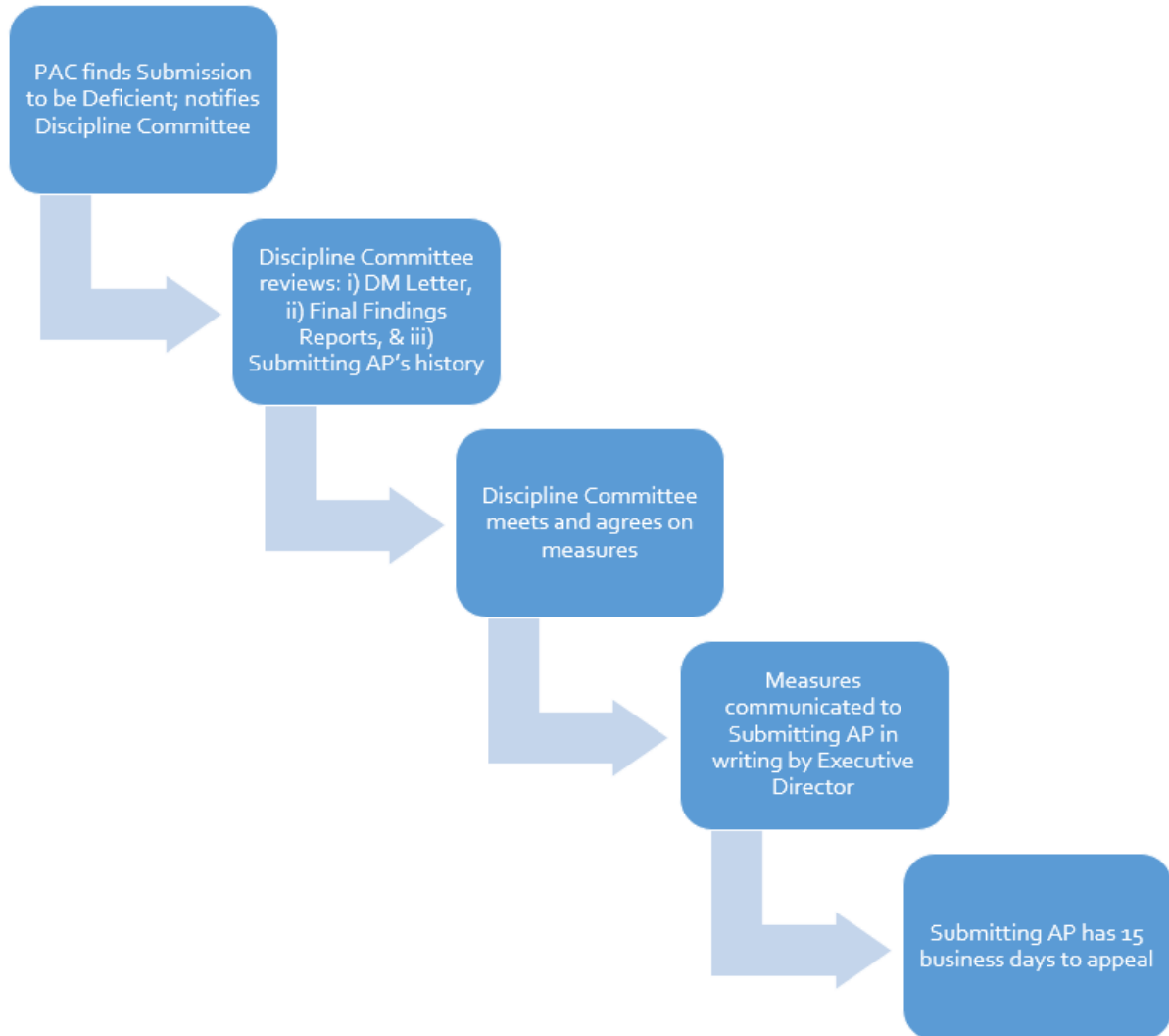


Steps in the PA process - Final Findings

Possible outcomes - Sufficient or Deficient findings

- Sufficient submissions - are sent on to ENV for final review and release of the instrument.
 - Note that Submitting APs may be sent a “cautionary letter” if their work is inconsistent with current standards of care.
- Deficient submissions – in order to obtain a legal instrument for a site re-submission that addresses the issues that triggered a deficient finding is required

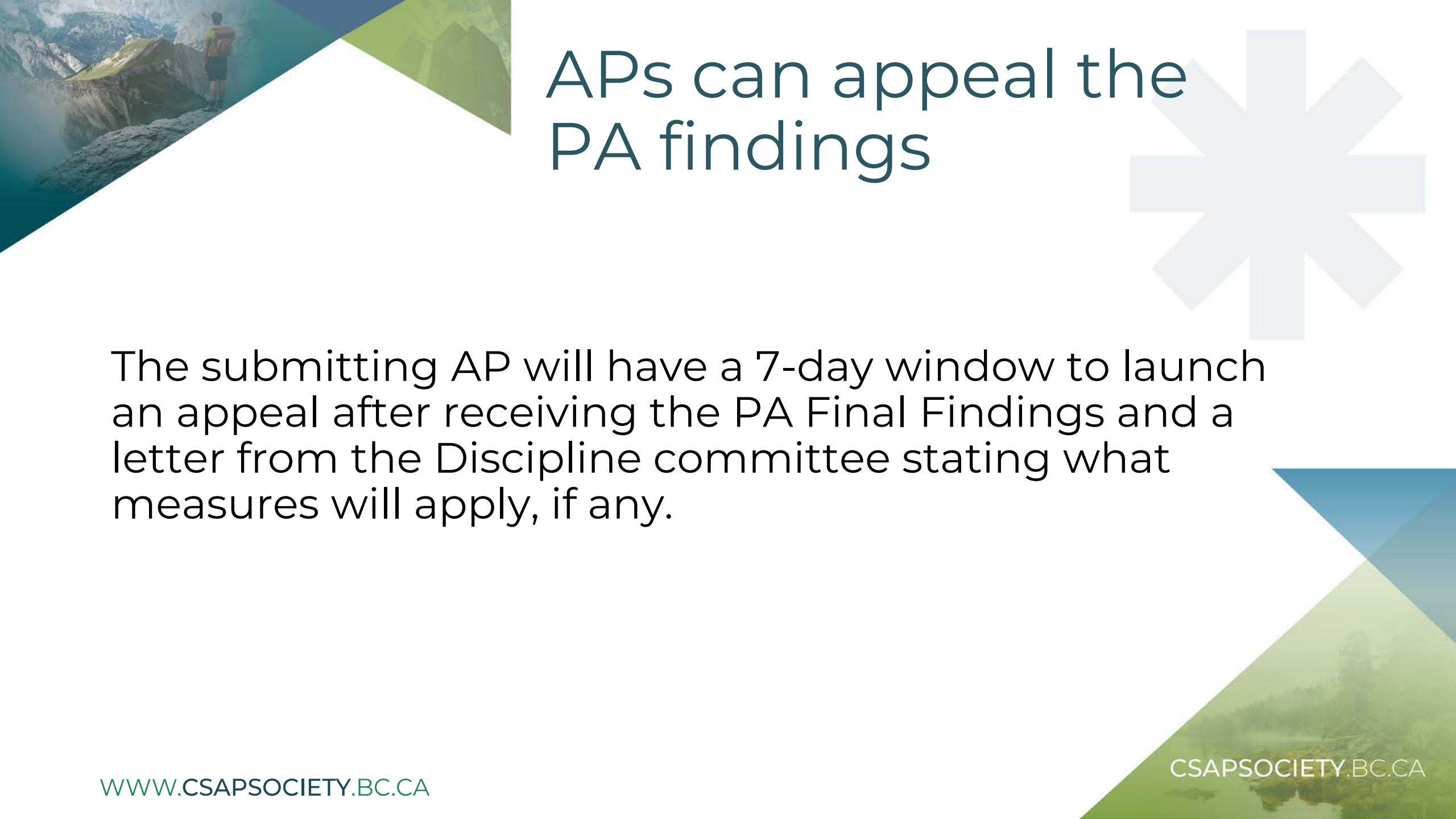
Next steps when a PA is found deficient





Remedial Measures

- Remedial measures can include one or more of the following:
 - No action needed
 - Education – self directed and approved by Discipline Committee to be completed before next submission
 - Education – specified by the Discipline Committee to be completed before next submission
 - Oversight of next submission by another AP in good standing for a specified number of hours
 - Next submission will be subjected to a non-random Performance Assessment
 - Recommendation to the Board of suspension of AP for a specified period of time
 - Re-write technical and/or regulatory exam



APs can appeal the PA findings

The submitting AP will have a 7-day window to launch an appeal after receiving the PA Final Findings and a letter from the Discipline committee stating what measures will apply, if any.



Other P6 AP roles

- APs may provide recommendations to director
- Changes over a period of time
- The adequacy of investigations
- Site risk classification; • Performance verification, contingency, and operations and maintenance plans
- RP adequacy. For example, by occupancy;
- The design of measures required to prevent recontamination
- Summaries of remedial activities
- Assessments of remediation progress
- Confirmation that a parcel would qualify for a CofC
- The extent of delineation.



Further P6 roles



- “Reports and statements required to be submitted to the ministry as a condition of an AiP or a CoC must be accompanied by the recommendation of an AP”.
- “Reports and statements may include the following:
 - A site monitoring report
 - A summary of remedial activities at a site
 - An assessment of overall remediation progress”



What RSC Reviews

Approved Professional Statements	Requirement usually from an instrument but could be imposed in other ways by Director	Non HR, non HR Managed, non SDS related Various types: monitoring, progress, annual, quarterly, monthly, biennial, triennial, etc.. Also Closure reports
Monitoring Reports	same	same



RSC Formation



- In the past ENV reviewed those kinds of AP statements
- As of Jan 31, 2012 that a component of that work was shared with the Review Services Committee (RSC)
- You may be required to make such a submission via CSAP
- Different than recommendations for instruments (e.g. not subject to PAs).



From a CofC

“A statement signed by an Approved Professional shall be submitted to the Director on an annual basis within 90 days of the anniversary of the date of issue of this Certificate. The report shall be by an Approved Professional and shall include supporting documentation and the following:

i) A summary of the results of inspection and maintenance of any risk management and treatment works”



RSC vs ENV Application

- RSC - Reviewing reports and statements that must be submitted to meet a director's imposed requirement on a non-high risk site, such as those requirements found in Certificates of Compliance (CoCs) and Approvals in Principle (AiPs)
- Submitted to ENV – high risk, high risk managed
- Full description CSAP webpage



From CSAP webpage



MEMBERS PORTAL

- › [P6 Submission Package Requirements](#)
- › [Report Review Services](#)
- › [Research & Technical Studies](#)
- › [Professional Development Library](#)

CSAP Members Area

Each submission should be accompanied by fees and a hard copy of the cheque or a written fees. ENV fees cheque should be sent to CSAP electronically as FTP link will be logged in as received by CSAP office. CSAP does not accept longer.

ENV clarification regarding contact email a

All enquiries regarding applications, whether or even internal to government, be submitted



Submitting an AP Statement

- Check CSAP/RSC web page
- Questions can be sent to CSAP or ENV
- Will find RSC transmittal document and checklist for this type of work
- Fee schedule
- Request to Modify Director's Requirement – be sure to read the RSC webpage



Member requirements

- Your membership will be up for renewal in 3 years from the year you joined.
- You will need **at least 30 Professional Development Hours (PDH) per year totaling 150 PDHs over 3 years**. Please use the Submission Manager to submit your PDHs: <http://csapsubmissions.com/>
- You will need **at least 1 submission before your next renewal**
- Alternatively, members without a submission can write the Regulatory Exam to retain their membership.



Member events



- **Lunch and Learn series (virtual)**

- Runs throughout the year with some open to the public. No pre-registration is required.
- Next session: Members' Open Forum (members only)
- April 5, 2023, from 12 pm to 1:00 pm

- **CSAP AGM and Professional Development (PD) Workshop**

- June 1, 2023, from 9 a.m. to 4 p.m.
- Vancouver Convention Centre West

- **Fall PD Workshop**

- November 1, 2023, from 9 a.m. to 4 p.m.
- Vancouver Convention Centre West



Attending CSAP
events earns PD
hours



Members' Update



- CSAP's quarterly newsletter
- Features President's Message, Message from the Ministry, committee updates, links of interest, industry events/opportunities, and more
- Find the latest issue and previous issues at:
<http://www.csapsociety.bc.ca/about/news>



Questions?



Welcome aboard!



CSAP

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