

CSAP Members' Update Summer 2023

Message from the President

I hope everyone is enjoying the summer and finding time for some rest, relaxation, and fun. Hopefully not too much smoke wherever you are.

I want to start by welcoming the new directors and welcoming back the re-elected ones. Thank you to everyone who put their hat in the ring — it is very much appreciated. Board members are now settling into their new committee chair or executive assignments and I'm sure they will bring fresh ideas and energy to their roles.

Thanks to the efforts of Patricia, Nelly, Anna, and Dana as well as the members of the PD Committee, our recent AGM and PD Workshop was a big success. And great work by the presenters!

On the Stage 14 front, practitioners, contractors, clients, and Ministry staff are still adapting to the new Soil Relocation landscape. CSAP is actively working with the Ministry in anticipation of upcoming revisions to Protocol 19.

Please enjoy the summer and see you in the fall.

Ministry Updates

The Ministry of Environment and Climate Change Strategy is pleased to announce that Carrie Nugent is the successful candidate for the position of Director, Land Remediation Section in the Environmental Emergencies and Land Remediation Branch. Carrie has been acting in this role since September 2022.

The ministry continues to receive feedback from industry and consultants since the release of the first phase of [Protocol 19: Site Investigation and Reporting](#) and is proceeding with the review of the soil relocation investigation requirements. Release of Phase 1 for soil relocation is expected in late fall 2023/early 2024 and will be announced through Site Remediation News. Phase 2 of the protocol is also underway and will include an expansion of the investigation and reporting details for all media.

Following the October 2022 publication of the discussion paper [Making Contaminated Sites Climate Ready](#), the ministry conducted Indigenous and Public engagement. The findings from the consultation have been summarized in two [What We Heard Reports](#). An Indigenous advisory group has since been developed, and targeted consultation is currently underway with interested parties, including a CSAP Working Group. All input is being considered in the development of potential new policies and legislation along with possible amendments to current requirements in preparation for climate change adaptation and sustainability, and the protection of groundwater quality. An intentions paper will be finalized in the next few months, with legislative changes put forward for Cabinet approval in spring 2024.

The Soil Relocation Information System (SRIS) has been online since Stage 14 CSR amendments were implemented March 1, 2023. The SRIS allows people access to information on soil relocation notifications and high-volume receiving site registrations. A recent reporting error was identified for cases where submissions included a comma in the soil volume section. This issue is being rectified and correct volumes will soon be displayed for all submissions.

To support the Province's commitment for a co-ordinated permitting strategy that will improve timelines for applications related to housing development projects, Land Remediation has hired twelve new staff and a few further competitions are underway. The increased internal capacity has allowed for a continual reduction in the overall application queue, with a 20% decrease seen since the Premier's announcement was made on January 16, 2023. Housing information on all incoming applications is being captured on the current Contaminated Sites Services Application Form (CSSAF); however, the section has yet to receive official direction to prioritize housing related applications. Forms are available on the Remediation [Apply for Services](#) and [Forms webpages](#).

Land Remediation and the Digital Transformation team are thrilled to announce the July 31st release of the new Site Remediation Services portal used to apply for contaminated sites services. User Acceptance Testing was conducted this past week to help fine-tune the needs and functionality of the release. Activation details and further information on the improvements to the application process will be announced in the upcoming weeks via Site Remediation News.

Site Remediation updates and announcements will be made through our [Site remediation news](#) email subscription service.

Performance Assessment Committee and Preliminary and Detail Administrative Screening Committee Updates

- At the request of ENV, consideration was made recently to revise CSAP Rule 28(2)(a) regarding the timeframe in which ENV may request PAC conduct a Focused Review or a non-random PA on a submission received from CSAP. Based on the current backlog of applications within ENV and the timing involved with assigning Protocol 6 applications to statutory decisions makers (SDMs), which may take up to 15 business days, the rule will be revised to the recommended timeframe of three (3) months, essentially doubling the existing 30 business days afforded by the rule.
- After P6 submissions have been forwarded to ENV for signature, ENV may have subsequent email correspondence to resolve issues during review by the SDM. Given it has left CSAP and then sits with ENV, it is at ENV's discretion to request an Addendum to cover details provided in email correspondence. This in turn would require revisions to the SoSC and draft certification document.

- Revised the PA Guidelines to incorporate Focused Reviews and timing of PA responses by submitting APs.
- Currently looking to revive PA Lessons Learned for compilation and sharing during PD events and/or member updates. An example from a recent PA is included herein for a Determination application.
 - *Stage 2 PSI - Poorly screened wells*
One well was dry and could not be sampled, leaving only two wells to determine groundwater flow, which could not be achieved. This was addressed after the Stage 1 Findings report by sampling and monitoring an additional well on site.
 - *Stage 2 PSI - Poorly located BHs/MWs/SVs*
BHs/MWs were installed on the periphery of the site away from the onsite APEC, with no locations installed through the building slab or immediately adjacent the building.
 - *Stage 2 PSI - Sampling density*
Initially only one location, on the southern extent of the property, was used to evaluate vapour for the entire site. Following the Stage 1 Findings, a new vapour probe was installed, and an additional location was added to have three vapour locations investigate the site.
 - *Stage 2 PSI - Inadequate Investigation*
The sampling locations were too far away from the site APEC, and initially seasonality was not provided, BHs were too far apart, and vapour investigation was inadequate. A number of these items were addressed in the Addendum Report.
 - Collectively, the deficiencies noted did not support the application for a Determination, not a contaminated site.

A summary of previous PAC Updates is available [here](#).

Screening Updates

Preliminary Screening

To obtain Final Determination, please email CSAP the draft instrument and cover letter 35 to 60 days after Preliminary Determination is signed by ENV. Please make sure draft Final Determination Schedules A, B, C and D, and cover letter exactly match the released Preliminary Determination wording and format.

Detailed Screening

A review of Detailed Screening issues identified over approximately the past year indicates that the following issues are frequently identified. Please continue to watch for these issues in your submissions and share them with others in your firm that may complete SoSCs:

- In the SoSC Section 4.2, explicit statements regarding the application (or lack thereof) of ALL water uses (AW, DW, IW and LW) should be provided.
- In the SoSC Section 4.4, both current and future vapour use must be addressed and information on the vapour attenuation factors used in the vapour assessment must be included.
- In the SoSC Section 4.6, notes must be provided on the risk classification for the site.
- If P4 or P9 background determinations have been applied for, or if regional background concentrations are applied, the background concentrations must be included in the notes in the SoSC Section 4.6.
- For risk-based submissions, the Site Type (1 or 2) must be provided in the notes in the SoSC, Section 4.6 (can also be included in Section 5.1 and/or 5.2). All Type 2 sites require a PVP.
- Spellings for substances must match the CSR schedules (applies to both SoSC and instrument).
- Previous AiP: Requirements/conditions from a previous AiP and how they were addressed should be included in Section 5.2 of the SoSC.

Review Services Committee Updates

The Review Services Committee has now been completing reviews for 1.5 years.

The RSC generally reviews semi-annual/biannual, quarterly, or monthly reports; or other similar titles which are typically specified by Director's clauses or in Schedule B of certification documents. For example, all AIPs have a requirement for an annual-submission until that requirement is closed by receipt of a CofC.

During the first year we averaged two applications for review per month with the frequency increasing during 2023 increased to three per month on average. The requirement for the submission is mostly commonly AiPs (60% of applications received in 2023). A third of the reviews completed in 2023 were for sites also reviewed last year as well (ongoing requirement).

Our technical reviews are forwarded to ENV where the Statutory Decision Maker (SDM) for their consideration and the SDM will then issue their final decision letter. In recent months the RSC has had two meetings with the SDMs to share our review experiences and to streamline the process.

We encourage all PR actioners to familiarize themselves in regards to which types of applications are required to be sent CSAP (vs. ENV) via the [RSC webpage](#). In addition, further details on application requirements and advice are also provided on the webpage. CSAP is willing to respond to any questions in regard to the review process quickly upon receipt to assist submitters.

Technical Review Committee Updates

The TRC has been busy working on kicking off two new Special Projects as well as participating in Technical Reviews on behalf of ENV. Further details on these projects and technical reviews are below.

Protocol 2 and Development of Site-Specific Standards: Use of Groundwater Protection Model

– The purpose of this project is to raise awareness to practitioners on the potential use of the Groundwater Protection Model under Protocol 2 by preparing a presentation and written summary that can be used as a reference for practical use of Protocol 2. After receiving four high quality proposals, SLR was awarded the work in early June. The project is now underway, with a target completion date of September 15, 2023. The final deliverable will be a summary style memo and an Excel workbook.

Shallow Vapour Attenuation Factors – The purpose of this project is to provide practitioners with science-based approaches for assessment of vapours in indoor air where groundwater is near to or in contact with the building foundation. The project will also include a desktop evaluation of attenuation factors and information from other jurisdictions as it relates to the new soil relocation legislation and the triggers for soil vapour assessment. This project is being conducted by MEMS, Arcadis, and Hers Environmental. Stage 1 of the project, which consists of a brief memo describing minimum attenuation factors for supporting soil relocation, is due on August 25, 2023. Stage 2 is due on December 19, 2023, and will include a discussion on methods for addressing vapours when groundwater is near to or in contact with building foundations. A presentation to members will follow once the draft report is substantially complete.

Climate Change Impacts on Contaminated Sites in BC – CSAP is developing some guidance to help practitioners understand which climate hazards pose the greatest risk or challenge to our practice area in the future. The work was awarded to Core 6 in early January 2023. The final draft report is expected in early August. The preliminary findings of Core 6's work was presented at the Spring AGM and can be found [here](#).

CSAP was asked by ENV to participate in targeted consultation on two different technical topics in May. The TRC reached out to members to solicit volunteers to participate and formed small working groups of up to 6 members. Volunteers were selected based on the range/type of experience relevant to each of the topic areas. The two topics that ENV was soliciting input on are described below.

Draft Intentions Paper – Making Contaminated Sites Climate Ready – ENV will be releasing an intentions paper in the fall related to climate change. The intentions paper will build on the discussion paper they released in the fall and the comments they received from stakeholders and Indigenous groups. As part of the targeted consultation, two meetings were held on June 5 and 27 between ENV and the CSAP working group. ENV shared their draft concepts for the intentions paper during these meetings, followed by questions/comments. The main objectives of the intentions paper were:

- Objective 1: Support reconciliation and ensure Indigenous views and interests are sought and considered in remediation processes
- Objective 2: Incorporate climate change adaptation into contaminated sites laws and policies
- Objective 3: Improve remediation planning including evaluation of remediation alternatives
- Objective 4: Protect current and future water resources
- Objective 5: Establish and implement clear procedures for requiring and conditions for, financial security at contaminated sites

A memo summarizing the feedback provided by the CSAP working group during the meetings was forwarded to ENV on July 18.

Protocol 19 – Site Investigation and Reporting - ENV also reached out to CSAP to engage directly on Protocol 19 (P19) as they are considering updating this protocol. ENV wanted to understand APs perspectives on P19, in terms of what was/ was not working. A meeting was held on 10 July between ENV and the CSAP working group. In addition, the TRC has also solicited feedback on P19, in two other ways: i) arranged a meeting with a small group of APs that have gone through the soil relocation process; and ii) added some questions to the AGM survey regarding experiences with P19. All of the comments collected on P19 from the above consultations were consolidated and forwarded to ENV on 20 July.

Volunteer Shout Out - The TRC would like to recognize several members that volunteered to help out with two recent initiatives that involved meeting with ENV to discuss draft or upcoming changes to policies/protocols:

- **Draft Intentions Paper – Making Contaminated Sites Climate Ready** – Guy Patrick, Gary Hamilton, Ben Lin, Tadd Berger, Duncan Macdonald
- **Protocol 19 – Site Investigation and Reporting** – Dawn Flotten, Jason Christensen, Travis Deeter, Vijay Kallur

Thank you as your support and input is greatly appreciated!

If you have any suggestions for a topic that you would like the TRC to tackle, please send your ideas to TRC@csapsociety.bc.ca.

Membership Committee Updates

The CSAP 2023 Candidate Experience Review process has concluded for this year's regulatory examination and technical assessments. Candidates have been informed of the results, with those who have been approved to take the exams receiving information regarding the date, time, and location of their assessment/exam. The 2023 Regulatory Exam is scheduled to take place on November 7, 2023, while the Technical Assessments are set for September 19, 2023 (Numeric) and September 20, 2023 (Risk).

The number of applicants approved to take the exams this year are as follows:

- Total Candidates: 11
- Numerical Exam: 6
- Regulatory Exam: 10
- Risk Exam: 3

Please be aware that the deadline for applications to write the Regulatory Exam is August 31, 2023, for those members who were unable to complete a CSAP submission as part of their renewal requirements.

Thank you to all the Committee Members, Experience Reviewers, and Exam/Assessment Content Developers for their contributions to the committee and exam process.

Professional Development Committee Updates

AGM and PD Workshop

On June 1 we held our first in-person AGM since 2019. Thank you to the almost 100 members, ENV staff, and presenters who attended. It was wonderful to see so many of you! The post-event happy hour was also well attended.

After the formal AGM in the morning, the day continued with updates from the BC Ministry of Environment and Climate Change Strategy as well as sessions on climate change impacts on contaminated sites, groundwater protection regulations, a panel discussion on Stage 14 amendments, and more. Find the presentations [here](#) and ENV’s presentations in [Member Services](#).

Lunch and Learns

On May 17 we hosted a Lunch and Learn session on CSAP Guidance for PCOCs which was attended by over 100 professionals and on June 21 we hosted our second Members’ Open Forum. Find the recording of the PCOCs session [here](#).

The remainder of our 2023 schedule is as follows:

Date	Time	Topic
August 9	11 a.m.	P6 Approvals
September 13	12 p.m.	Members’ Open Forum with ENV
November 22	11 a.m.	Vapour (joint presentation with ENV)

Bookmark the [event webpage](#) for Zoom links and any updates.

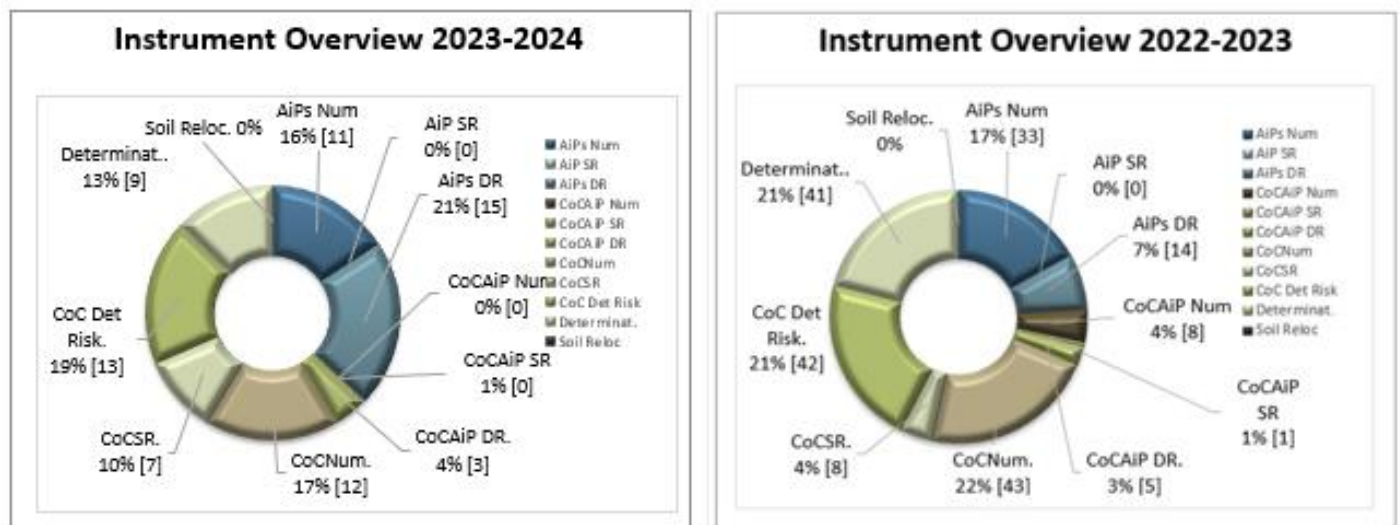
Fall PD Workshop

Our annual fall event is now [open for registration](#)! Taking place November 1 at the Vancouver Convention Centre West, this full-day event will feature updates from the BC Ministry of Environment and Climate Change Strategy along with other sessions (TBD). Plus, we'll have a post-event happy hour.

Thank you to the members who provided feedback on topics in our annual members' survey. If you have suggestions for topics or speakers, please email PDCom@csapsociety.bc.ca.

[Register now.](#)

Submission Statistics update (as of July 20, 2023)



What's new at CSAP

- [Fall PD Workshop registration is now open.](#)

Links of Interest

- [How Ontario's rules for dealing with excavated dirt aim to clean up the industry](#)
- [Solar power, gas capture offer ways to repurpose landfills and other brownfields](#)
- [Where are the private sector jobs in B.C.?](#)
- [BCBC: Victoria, WorkSafeBC need to better consider employer needs](#)
- [The foundations of provincial prosperity: A review of what B.C. exports to the world... today and in the future](#)
- [The outlook for capital spending in uncertain economic times](#)
- [There's something about carbon pricing](#)

If you have a link of interest please forward it to csapcommunications@csapsociety.bc.ca.

Industry Events

- [Workshop & Conference on Contaminated Sites](#) - SABCS, September 27 & 28, 2023, Whistler
- [EGBC Annual Conference](#) - October 26–28, 2023, Whistler
- [“Remediation Now” Workshop: Soil management in BC – What now and where are we going?](#) - November 7, 2023, in-person (TBC) and virtual
- [Climate Adaptation Fundamentals Micro-credential](#) – Royal Roads, ongoing, virtual
- [Clean-Up Information website](#)
- [Regenesis.com](#)
- [GeoEnviroPro](#)