



Victoria File: 26250-20/23355
Site ID: 23355

July 8, 2022

Andy Tam
Keltic (Prior) GP Ltd.
2338 – 666 Burrard Street
Vancouver, BC V6C 2X8
andyt@kelticdevelopment.com

Dear Andy Tam:

Re: Approval in Principle – 220 Prior Street, Vancouver, British Columbia

Please find enclosed an Approval in Principle respecting the contaminated site referenced above.

In addition to the conditions set out in Schedule B of the Approval in Principle, please be advised of the following:

1. Information about the site will be included in the Site Registry established under the *Environmental Management Act*.
2. The provisions of this Approval in Principle are without prejudice to the right of the Director to make orders or impose requirements as the Director may deem necessary in accordance with applicable laws. Nothing in this Approval in Principle will restrict or impair the Director's powers in this regard.
3. A qualified environmental consultant should be available to identify, characterize and appropriately manage:
 - (a) any environmental media that may be contaminated, or
 - (b) soil which may exceed the standards triggering a Contaminated Soil Relocation Agreement set out in section 40 of the Contaminated Sites Regulationand may be encountered during any future subsurface work at the site.
4. This Approval in Principle does not authorize entry upon, crossing over, or use for any purpose of private or Crown lands or works, unless and except as authorized by the owner of such lands or works. The responsibility for obtaining such authority rests with the persons undertaking remediation. It is also the responsibility of those persons to ensure that all

activities conducted under this Approval in Principle are carried out with due regard to the rights of third parties, and comply with other applicable legislation that may be in force.

5. Additional permits and approvals may be required before remediation begins.
6. All site materials (e.g., excavated soil, replaced soil, groundwater from dewatering, pumping, well development etc.) must be characterized and managed in accordance with applicable legislation and ministry guidance.
7. Groundwater wells that are no longer required must be properly decommissioned in accordance with the *Water Sustainability Act's* Groundwater Protection Regulation.
8. Please be advised that there are inherent health and safety risks associated with remediation activities at contaminated sites. Development of site-specific work procedures in accordance with WorkSafeBC regulations is warranted. Please direct related questions to the WorkSafeBC office at 604-276-3100 (Lower Mainland only) or 1-888-621-7233 (toll free in B.C.).
9. Any substantial modifications to the approved remediation plan, including substantial changes to the remediation schedule conditions upon which the remediation plan is based, or changes in land use, must be promptly identified by written submission to the Director.
10. If an application for a Certificate of Compliance is to be submitted for the site, the confirmation of remediation report accompanying the application must demonstrate compliance with the remediation standards and criteria in force at the time the application for the Certificate is made, which may differ from the remediation standards and criteria in force at the time of issuance of this Approval in Principle.

Issuance of this Approval in Principle is a decision that may be appealed under Part 8 of the *Environmental Management Act*.

If you require clarification of any aspect of this Approval in Principle, please contact the undersigned at james.plett@gov.bc.ca.

Yours truly,



James Plett
Senior Contaminated Sites Officer

Enclosure

cc: City of Vancouver, Contaminated.Sites@vancouver.ca

Daniel Jay, Canadian Western Bank, Park Place 22nd Floor 666 Burrard Street
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CSAP Society, apopva@csapsociety.bc.ca

Michael Geraghty, Numerical Approved Professional, Keystone Environmental Ltd.
mgeraghty@keystoneenvironmental.ca

Client Information Officer, Land Remediation Section, csp_cio@Victoria1.gov.bc.ca



APPROVAL IN PRINCIPLE

(Pursuant to Section 53 of the *Environmental Management Act*)

THIS IS TO CERTIFY that the remediation plan described herein submitted by Keltic (Prior) GP Ltd. for the contaminated site identified in Schedule A of this document has been approved.

When implemented, the remediation plan must be implemented in accordance with the requirements and conditions specified in Schedule B.

The substances for which remediation will be conducted and for which this Approval in Principle is valid are specified in Schedule C.

I have issued this Approval in Principle based on a review of the documents listed in Schedule D. I, however, make no representation or warranty as to the accuracy or completeness of that information.

A Director may rescind this Approval in Principle if conditions imposed in the Approval in Principle are not complied with or any fees payable under Part 4 of the Act or regulations are outstanding.

This Approval in Principle should not be construed as an assurance that there are no hazards present at the site.

July 8, 2022
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Signing Authority
For Director, *Environmental Management Act*

Schedule A

The site covered by this Approval in Principle is located at 220 Prior Street, Vancouver, British Columbia which is more particularly known and described as:

Lot A (Reference Plan 2883) of Lot 20 District Lots 181, 196 and 2037 Plan 6780.

PID: 010-813-357

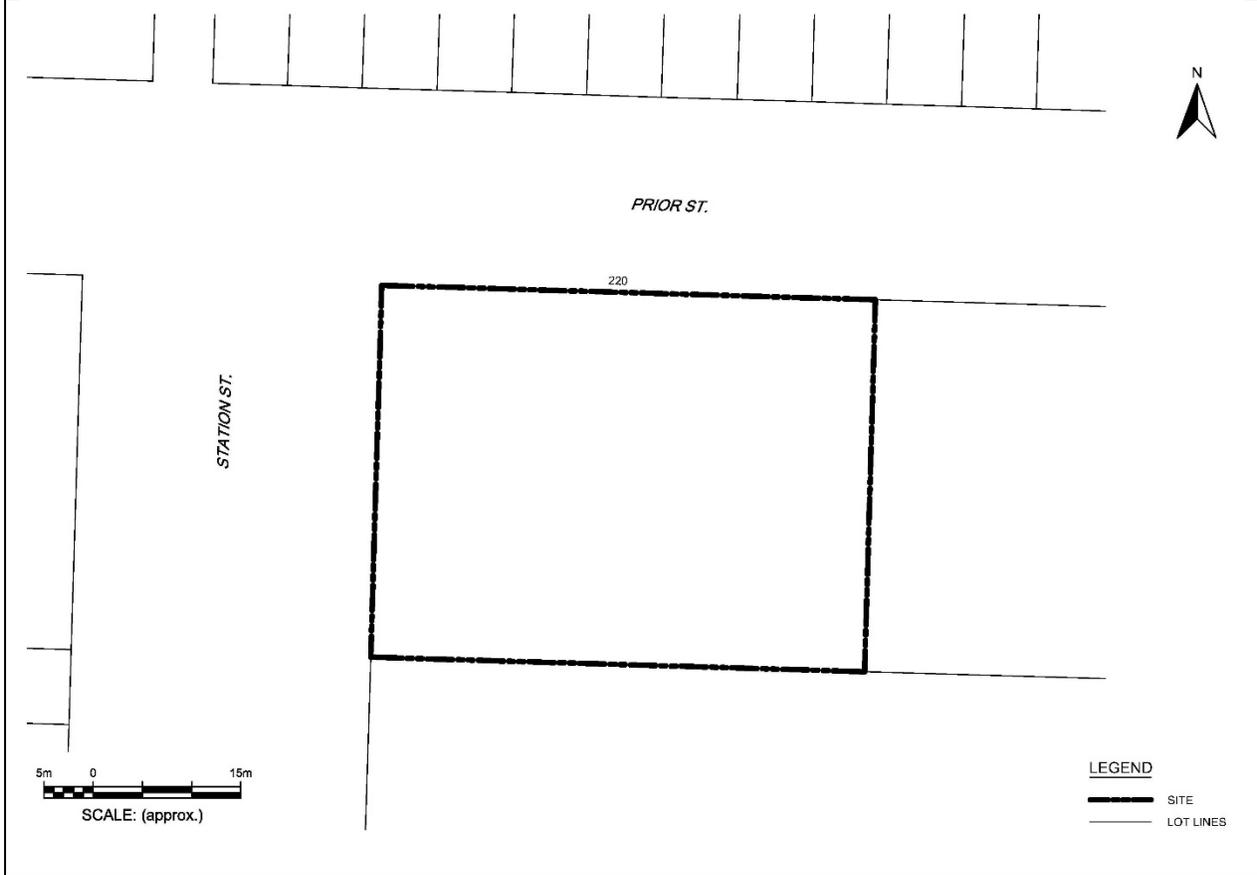
The approximate centre of the site using the NAD (North American Datum) 1983 convention is:

Latitude: 49° 16' 35.2"
Longitude: 123° 5' 54.7"

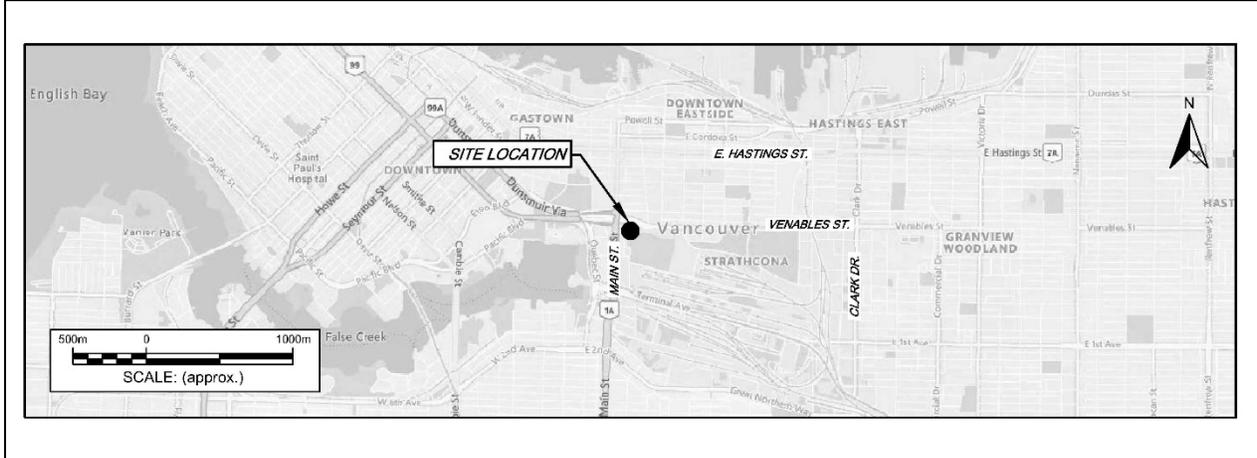
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Site Plan, Vancouver, BC



Location Map, Vancouver, BC



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Schedule B

Requirements and Conditions

1. Remediation, including monitoring, inspections and maintenance of any works, must be undertaken by the responsible person in the manner and schedule specified in the plan listed in Schedule D or as specified in a modification of the plan approved by the Director.
2. Any substantial modifications to the approved remediation plan, including substantial changes to the remediation schedule or changes in land, vapour, or water use, must be promptly identified in a written submission by the responsible person to the Director. An application for an amendment or new Approval in Principle may be necessary.
3. Up-to-date records of monitoring, inspections and maintenance of any works must be maintained by the responsible person or their agent. The records must be available for inspection by the Director.
4. Remediation must be completed within five years of the date of issuance of this Approval in Principle.
5. Remediation must be confirmed in accordance with applicable legislation and ministry guidance. Within 90 days of completing remediation, a report summarizing confirmation of remediation must be prepared in accordance with section 49 (2) of the Contaminated Sites Regulation and submitted to the Director.
6. A statement signed by an Approved Professional must be submitted to the Director annually within 90 days of the anniversary of the date of issuance of this Approval in Principle. The statement must include the following:
 - (a) A summary of remedial activities undertaken during the reporting period; and
 - (b) An assessment comparing remediation progress to the actions and schedule set out in the plan referenced above. Refer to Condition 3 above if remedial progress differs substantially from the schedule set out in the approved plan.

If requested by the Director, a report signed by an Approved Professional must be submitted for review to the Director and must include the following:

- (a) A summary of remedial activities undertaken to date;
- (b) An assessment comparing remediation progress to the actions and schedule set out in the plan referenced above. Refer to Condition 3 above if remedial progress differs substantially from the schedule set out in the approved plan;

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- (c) Interpretation of current and cumulative monitoring results from the soil, vapour, and/or groundwater monitoring program; and
 - (d) Supporting documentation (e.g., analytical reports, records of inspection, maintenance of treatment works, etc.).
7. The documents listed in Schedule D indicate that vapour attenuation factors were applied to meet Contaminated Sites Regulation numerical standards at and adjacent to the site. These vapour attenuation factors were selected based on assumptions about the structures, locations, and depths of buildings existing or expected at and adjacent to the site. These assumptions include the following:
- (a) A proposed building with commercial uses at ground level over four levels of underground parking will cover the entire site.

Any inconsistencies that arise between the structures, locations, and depths of proposed or constructed buildings at or adjacent to the site and the range of structures, locations, and depths of buildings assumed in the selection of vapour attenuation factors in the documents listed in Schedule D must be promptly identified by the responsible person in a written submission to the Director. An application for an amendment or new Approval in Principle may be necessary.

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Schedule C

Substances and Uses

Substances to be remediated in soil for commercial land soil use:

To meet numerical remediation standards:

| | |
|-------------------------|---------------------|
| antimony | 7440-36-0 |
| arsenic | 7440-38-2 |
| barium | 7440-39-3 |
| benz(a)anthracene | 56-55-3 |
| benzo(b+j)fluoranthenes | 205-99-2 & 205-82-3 |
| benzo(k)fluoranthene | 207-08-9 |
| chromium | 7440-47-3 |
| copper | 7440-50-8 |
| HEPHs | NA |
| indeno(1,2,3-cd)pyrene | 193-39-5 |
| lead | 7439-9-1 |
| tin | 7440-31-5 |
| zinc | 7440-66-6 |

To meet local background concentrations:

| | |
|----------|-----------|
| selenium | 7782-49-2 |
|----------|-----------|

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Schedule D

Documents

Summary of Site Conditions, 220 Prior Street, Vancouver, BC, Keystone Environmental Ltd., May 10, 2022;

Report of Findings – Stage 1 and Stage 2 Preliminary Site Investigation, Detailed Site Investigation, and Remediation Plan, 220 Prior Street, Vancouver, BC, Keystone Environmental Ltd., April 4, 2022;

Protocol 6 Request for Preapproval to not Delineate Soil Contamination 220 Prior Street, Vancouver, BC, British Columbia Ministry of Environment and Climate Change Strategy, April 1, 2022;

Protocol 6 Request for Preapproval to Not Delineate Soil Contamination, 220 Prior Street, Vancouver, BC, PID: 010-813-357, BC ENV Site Registry ID: 23355, Keystone Environmental Ltd., May 11, 2021;

Underground Storage Tank Removal - City of Vancouver Permit Number FI-2020-00354, 220 Prior Street, Vancouver, BC, Keystone Environmental Ltd., October 28, 2020;

Report of Findings – Phase II Environmental Site Assessment, 220 Prior Street, Vancouver, BC, Keystone Environmental Ltd., January 30, 2020;

Sub-surface Environmental Site Investigation, 220 Prior Street, Vancouver, BC, D. Kelly Environmental Consulting Ltd., June 12, 2019;

Geotechnical Investigation Report – Proposed Commercial Tower Development, 220 Prior Street, Vancouver, BC, GeoPacific Consultants Ltd., June 11, 2019; and,

Stage 1 Preliminary Site Investigation, 220 Prior Street, Vancouver, BC, D. Kelly Environmental Consulting Ltd., May 11, 2017.

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