

Site Risk Classification Process

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SITE RISK CLASSIFICATION PROCESS FOR HIGH RISK SITES

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Ministry of
Environment and
Climate Change Strategy

Issues with P12 submissions:

- Incomplete submissions for high risk sites at the initiation stage
- Incomplete Summary of Site Condition (SoSC) forms submitted for high risk sites

INCOMPLETE SUBMISSIONS

Table 2. Reporting requirements for sites by notification trigger

Column I	Column II	Column III	Column IV	Column V
No.	Notification Trigger	Non-high Risk Site Additional Reporting Requirements	High Risk Site Additional Reporting Requirements	Notes 1, 2, 3, 4
1	Submission of a Notification of Initiation of Independent Remediation to the Director	Site Risk Classification Report Exposure Pathway Questionnaire	Refer to Table 3	
2	Submission of a Site investigation report required or ordered by a Director		Site Risk Classification Report Exposure Pathway Questionnaire Summary of Site Condition Summary of remedial methods Schedule for remediation Interim reporting as required by Director	
3	Submission of a Notification of Likely or Actual Migration to a Director			5, 6
4 (a)	Application to a Director for a contaminated sites service in Table 2 or 3 of Schedule 3 of the Regulation – Approved Professional review		Not applicable	7
4(b)	Application to a Director for a contaminated sites service in Table 2 or 3 of Schedule 3 of the Regulation – ministry review		Site Risk Classification Report Exposure Pathway Questionnaire Summary of Site Condition Summary of remedial methods Schedule for remediation Interim reporting as required by Director	7
5	Imposition of the requirement for a Site Risk Classification Report submission by a Director			
6	Potential or actual high risk conditions at a neighbouring site are indicated in the Site Risk Classification Report submitted to a Director for a site under any of the preceding triggers			8

Notes (Please note that footnotes 1 to 4 apply to all line items)

- Satisfactorily completed Site Risk Classification Reports and additional information other than interim reports must be provided at the time of submission for the notification triggers listed in Column II.
- Reports for notification triggers required elsewhere in the contaminated sites legal regime (e.g., Summaries of Site Condition with contaminated sites service applications required under section 7.1 of the Regulation) are not included in this table.
- Satisfactorily completed Exposure Pathway Questionnaires must be submitted only if substances exceeding upper cap concentrations are present.
- Where a summary of remedial methods or a schedule for remediation is required in this table, the requirement only refers to the remediation of high risk conditions at the site.
- Reporting requirements refer to those for the source site.
- Summary of Site Condition should include current tables and figures for all investigated media.
- Service applications refer to contaminated sites service applications listed in Table 2 and 3 of Schedule 3 of the Regulation. Service applications eligible for review by Approved Professionals are as specified in Protocol 6, "Eligibility of Applications for Review by Approved Professionals". All other service applications are subject to review by the ministry.
- If the migration or likely migration of substances from a source site results in actual or potential high risk conditions being identified in a Site Risk Classification Report submitted for a site, separate site risk classification information must be submitted to the Director as specified under Columns III or IV. Item 6 in Table 2, for each neighbouring site associated with that substance migration which would be, or would likely be classified as high risk.

When submitting SRCR for HR sites, we expect you to:

- Submit SoSC
- Submit Remedial Plan & Schedule for HR conditions
 - Summary of previous investigations
- Submit figures and tables
 - If you need extra time, ask for extension
- Submit Contaminated Sites Service Application Form (CSSAF)



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HIGH RISK SITES REPORTING REQUIREMENTS

Table 3. Reporting requirements for high risk sites undergoing independent remediation

Column I	Column II	Column III	Column IV
Type of Requirement	Reporting requirements for elimination of high risk conditions within 90 days	Reporting requirements for elimination or risk management of high risk conditions taking more than 90 days	Notes 1, 2, 3
Reporting at initiation of independent remediation	Confirmation that elimination of high risk conditions will occur within 90 days Site Risk Classification Report Exposure Pathway Questionnaire	Site Risk Classification Report Exposure Pathway Questionnaire Summary of Site Condition Summary of remedial methods Schedule for remediation	3, 4, 5, 6
Interim reporting	Not required	Interim reports as required by a Director	
Reporting at completion of remediation of high risk conditions	Site Risk Classification Report confirming that site is no longer high risk Approved Professional signoff	Site Risk Classification Report confirming that site is no longer high risk Summary of Site Condition Approved Professional signoff	5, 6

Notes

1. Reports for notification triggers required elsewhere in the contaminated sites legal regime (e.g., Notifications of Likely or Actual Migration) are not included in this table.
2. The Director, as authorized under the Act, may set conditions and timelines differing from those set out above as appropriate and warranted by site conditions and circumstances.
3. Remedial methods and schedule refer to actions and timelines to address all site conditions leading to the reclassification of a high risk site.
4. Exposure Pathway Questionnaires are required only if upper cap concentrations of substances are present at the site.
5. If high risk conditions cannot be eliminated within 90 days of initiation of independent remediation, despite having indicated that intent in Section VIII of the Site Risk Classification Report, at 90 days the Director must be provided with a revised Site Risk Classification Report, updated schedule for remediation and all other reporting requirements specified in Column III.
6. Summary of Site Condition should include current tables and figures for all investigated media.

HOW TO FILL SOSC FOR P12

Part 1

REASON FOR COMPLETING THIS SUMMARY

☐ Recommendation is being made, or

☒ This is a submission without a recommendation under the CSR

ROLE OF APPROVED PROFESSIONAL

Reviews:

☐ Stage 1 preliminary site investigation report (Stage 1 PSI)

☐ Stage 2 preliminary site investigation report (Stage 2 PSI)

☐ Detailed site investigation report (DSI)

☐ Background substance concentrations report

☐ Remediation plan without risk assessment report

☐ Remediation plan with risk assessment report

☐ Confirmation of remediation report (CoR)

☐ Quantitative human health or ecological risk assessment report

☐ Screening level risk assessment report

☒ Other (please specify): For site risk classification as per the requirements of Protocol 12.

HOW TO FILL SOSC FOR P12 – CONT'D

Part 7

PART 7: RECOMMENDATION OF APPROVED PROFESSIONAL(S)

7.1 Regulatory Instrument and Summary Recommendation

Based on the detailed technical information available for the site, as summarized in this Summary of Site Condition, I

Approved Professional Name

recommend that the following instrument be issued for the Subject Site.

- ☐ A Determination under section 44 of *EMA*
- ☐ An AiP under section 53 (1) of *EMA*
- ☐ A CoC under section 53(3) of *EMA*
- ☐ A CSRA under section 55(2) of *EMA*

☒ Other (specify below)

For site risk classification as per the requirements of Protocol 12.

HOW TO FILL SOSC FOR P12 – CONT'D

Part 7 – do not forget to sign and date (Section 7.2)

The opinions, advice and recommendations expressed in this Summary of Site Condition are made in accordance with generally accepted principles and practices as recognized by members of the applicable profession or discipline practising at the same time and in the same or similar locations. This Summary of Site Condition does not provide a legal opinion or guarantee regarding compliance with applicable laws.

Name(s) of Approved Professional(s)	Signature(s) of Approved Professional(s)	Date (YYYY-MM-DD)	Add	Delete
			+	-

Part 8 – do not forget to fill in if applicable

PART 8: STATEMENT OF SITE OWNER / AGENT / LESSEE

8.1 Offsite Migration Notification

If it is known that one or more substances has migrated or is likely to have migrated to a neighbouring site and is or is likely causing contamination of the neighbouring site, have notifications been given?

(See CSR Sec. 57 and 60.1 for requirements)

Have owners of impacted offsite properties been formally notified?

☐ Yes ☐ No

Has the ministry been formally notified?

☐ Yes ☐ No

Part 7 – do not forget to sign and date (Section 7.2)

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Have owners of impacted offsite properties been formally notified?

☐ Yes ☐ No

Has the ministry been formally notified?

☐ Yes ☐ No

THANK YOU

PETER YAN

FEEL FREE TO CONTACT ME AT SITELCLASSIFICATION@GOV.BC.CA IF YOU HAVE
ANY QUESTIONS.