

May 25, 2022

10-8481

Imperial Oil Limited
505 Quarry Park Blvd
Calgary, Alberta
T2C 5N1

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Attention: Environmental Services

Re: Performance Verification Plan for
Management Area at 371 Trans-Canada Highway NE
Salmon Arm, British Columbia

Further to your request, Parsons Inc. (Parsons) is pleased to provide this Performance Verification Plan (PVP) in support of an application for a Certificate of Compliance (CofC) for select Management Areas within the property located at 371 Trans-Canada Highway, in Salmon Arm, British Columbia (the "Subject Property"). The PVP presents the principal risk management measures that apply at the Management Areas to ensure that the CofC remains valid (i.e., the key risk management controls of Schedule B of the CofC which must remain in place in the Management Areas). The PVP was prepared in accordance with British Columbia Ministry of Environment & Climate Change Strategy (BC ENV) guidance.

BACKGROUND

A plan of the Subject Property, including the portion of the property designated as the Management Areas, is provided on Drawings No. 1 and No. 2.

A screening level risk assessment (SLRA) was conducted for the Subject Property and adjacent lands, and the results are presented in the Parsons report, "*Screening Level Risk Assessment, 371 Trans-Canada Highway, Salmon Arm, British Columbia*" (May 25, 2022). As documented in the SLRA report, soil and groundwater containing concentrations of petroleum hydrocarbon constituents, select metals and/or tetraethyl lead exceeding the applicable regulatory standards exists beneath the Subject Property. Remaining impacted soils are present below approximately 1.2 metres below ground surface (mbgs) or covered by asphalt. The impacted soils consist of arsenic, lead, naphthalene, toluene, xylenes, zinc, HEPHs, LEPHs, tetraethyl lead and VPHs. The groundwater is situated deeper than approximately 2.1 mbgs and consists of concentrations

exceeding the regulatory standards for arsenic, 1,2-dichlorobenzene, EPHW₁₀₋₁₉, LEPHW, naphthalene, non-aqueous phased liquids, toluene, VPHw and xylenes. Soil vapour sampling indicated that there are no unacceptable risks for human receptors within a future building at the Subject Property constructed at grade, nor are there any unacceptable risks for people breathing outdoor air.

PRINCIPAL RISK ASSESSMENT MANAGEMENT CONTROLS

The principal risk management measures on which the risk assessment was based, as presented in Schedule B of the CofC, are as follows:

(a) Management Areas 1 and 2, as defined by the metes and bounds description on the CofC and depicted on Drawing No. 1, will remain covered by a permanent barrier (i.e., pavement or concrete).

(b) Contaminated soils at the site, as defined by the metes and bounds description on the CofC and depicted on Drawing No. 2 (Management Area 3), must remain at their current depth (with the current Property elevation at approximately 358 meters above sea level) or at least 1.2 m below grade and are not to be re-distributed to shallower depths, nor a change permitted in future grade elevation that would cause current soil contamination to be situated at depths shallower than 1.2 mbgs.

DETERMINATION REMEDIATION TYPE

Based on the risk management measures for the Management Areas, (i.e., the use of institutional controls to mitigate/eliminate risks and lack of imminent risks in the event that the controls were either not implemented or were implemented but were rendered ineffective) the Site Type applicable for the Management Areas is considered to be Type 2.

Under Site Type 2 scenario, BC ENV indicates that a PVP is required.

PERFORMANCE VERIFICATION PLAN

A PVP is required to document that the principal risk management measures, upon which the SLRA is based, are being met for the Subject Property.

Based on the consideration of current and future land use at the Management Areas and the results of the environmental investigations performed at the Subject Property, including the SLRA, the following performance verification actions for the Subject Property are recommended:

Performance verification actions for the Subject Property include the following:

- (a) Communication with the owner of the Subject Property to ensure that soil containing zinc at concentrations exceeding the applicable numerical regulatory standard for the site must remain covered by a permanent barrier (i.e., concrete or pavement).
- (b) Communication with the owner of the Subject Property to ensure that soil containing petroleum hydrocarbon constituents and metals at concentrations exceeding the applicable numerical regulatory standards for the site (with the exception of the zinc impact soils in Management Areas 1 and 2) must remain at its current depth of at least 1.2 mbgs (current grade approximately 358 meters above sea level), nor is a change permitted in future grade elevation from the current elevation that would cause current soil contamination to be situated at shallower depths.

The owner of the Subject Property has been advised that it is not permitted in the future as per the assumptions of the risk assessment and this PVP. Furthermore, as each of the buildings in the area are at-grade construction, it is considered unlikely that there would be exposure to occupants of soils deeper than 1.2 mbgs in the future.

As such, an advisory for the Management Area of the Subject Property as per the above is considered sufficient to meet this risk management measure. The listing of this risk management measure in Schedule B of the CofC meets this requirement.

No associated inspection, monitoring/maintenance or other performance verification actions are required for the above conditions.

In summary, it is our opinion that the advisories listed in Schedule B of the CofC are sufficient to address the principal risk management measures required for the Management Area.

LIMITATION OF LIABILITY, SCOPE OF REPORT AND THIRD-PARTY RELIANCE

This report has been prepared and the work referred to in this report has been undertaken by Parsons for Imperial Oil Limited. It is intended for the sole and exclusive use of Imperial Oil Limited, its affiliated companies and partners and their respective agents, employees and advisors (collectively, "Imperial Oil"). Any use, reliance on or decision made by any person other than Imperial Oil based on this report is the sole responsibility of such other person. Imperial Oil and Parsons make no representation or warranty to any other person with regard to this report and the work referred to in this report and they accept no duty of care to any other person or

any liability or responsibility whatsoever for any losses, expenses, damages, fines, penalties or other harm that may be suffered or incurred by any other person as a result of the use of, reliance on, any decision made or any action taken based on this report or the work referred to in this report.

The investigations undertaken by Parsons with respect to this report and any conclusions or recommendations made in this report reflect Parsons' judgment based on the site conditions observed at the time of the site inspection on the date(s) set out in this report and on information examined at the time of preparation of this report. This report has been prepared for specific application to this site and it is based, in part, upon visual observation of the site, subsurface investigation at discrete locations and depths, and specific analysis of specific chemical parameters and materials during a specific time interval, all as described in this report. Unless otherwise stated, the findings cannot be extended to previous or future site conditions, portions of the site which were unavailable for direct investigation, subsurface locations which were not investigated directly, or chemical parameters, materials or analysis which were not addressed. Substances other than those addressed by the investigation described in this report may exist within the site, substances addressed by this investigation may exist in areas of the site not investigated and concentrations of substances addressed which are different than those reported may exist in areas other than the locations from which samples were taken.

If site conditions or applicable standards change or if any additional information becomes available at a future date, modifications to the findings, conclusions and recommendations in this report may be necessary.

Other than by Imperial Oil, copying or distribution of this report or use of or reliance on the information contained herein, in whole or in part, is not permitted without the express written permission of Parsons. Nothing in this report is intended to constitute or provide a legal opinion.

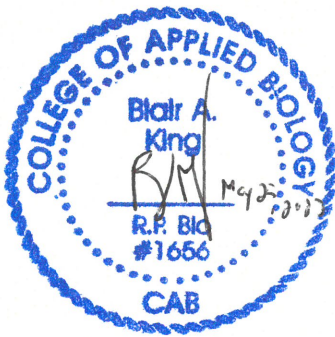
BRITISH COLUMBIA MINISTRY OF ENVIRONMENT'S RELIANCE

Notwithstanding the above, the British Columbia Ministry of Environment is permitted to rely on this report and the information contained herein to the extent necessary to confirm that Imperial has met their statutory obligations with respect to the Performance Verification Plan.

I trust that the foregoing information is satisfactory for your present requirements. Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

PARSONS INC.



B.A. King, P.Chem., R.P.Bio.

EMW/cer

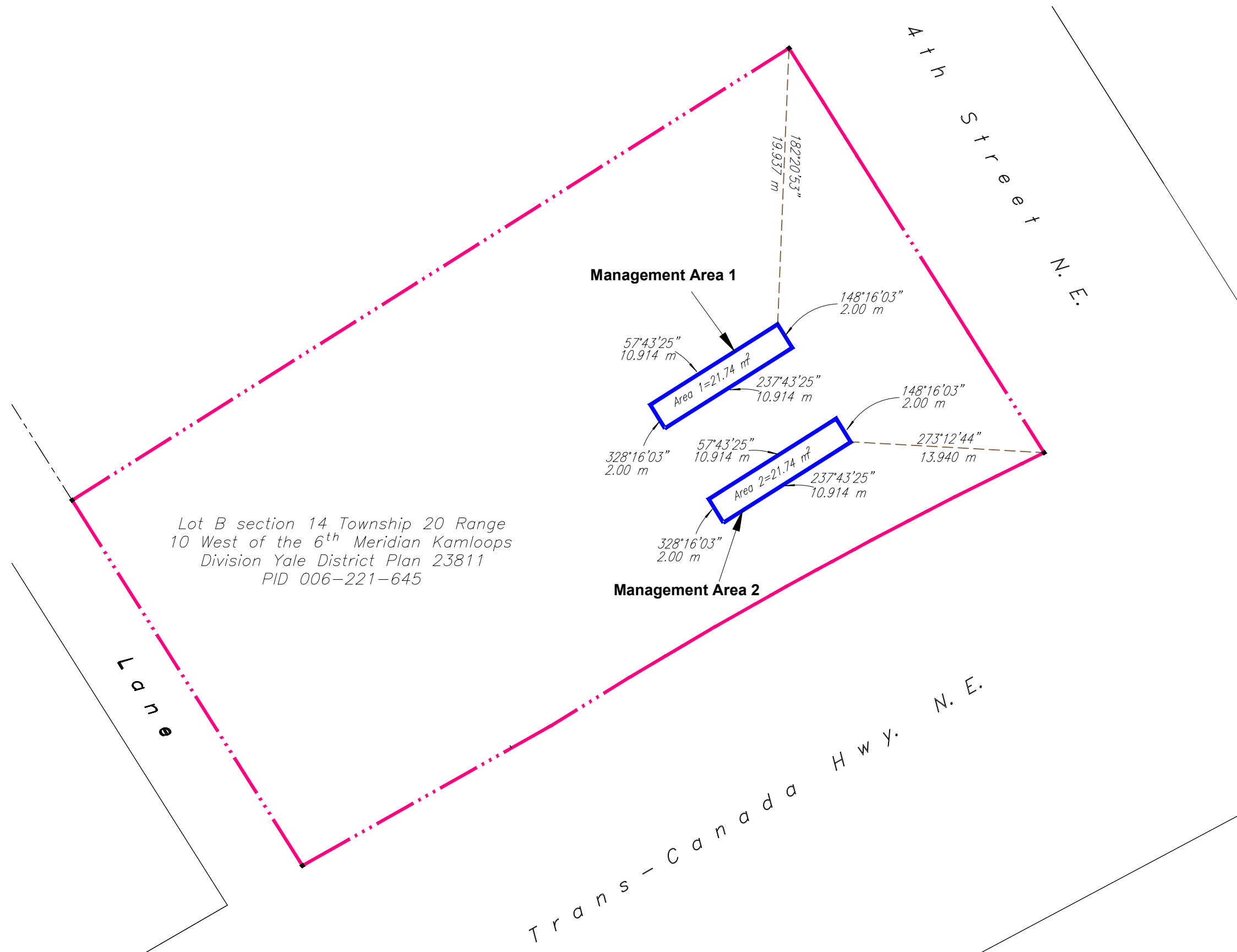


LEGEND

--- Subject property line

— Management Area

2021/12/31 Date format: yyyy/mm/dd



Lot B section 14 Township 20 Range
10 West of the 6th Meridian Kamloops
Division Yale District Plan 23811
PID 006-221-645



Management Areas 1 & 2		
Imperial Oil Limited 371 Trans-Canada Highway NE, Salmon Arm, British Columbia		
Drawn: VM	Page Size: 11 x 17 in.	Ref. No.: 10-8481
Reviewed: EMW	File No.: 8481 PLAN	Date: 2022/05/16
PARSONS		Drawing No.: 1

NOTE: All features are approximate.

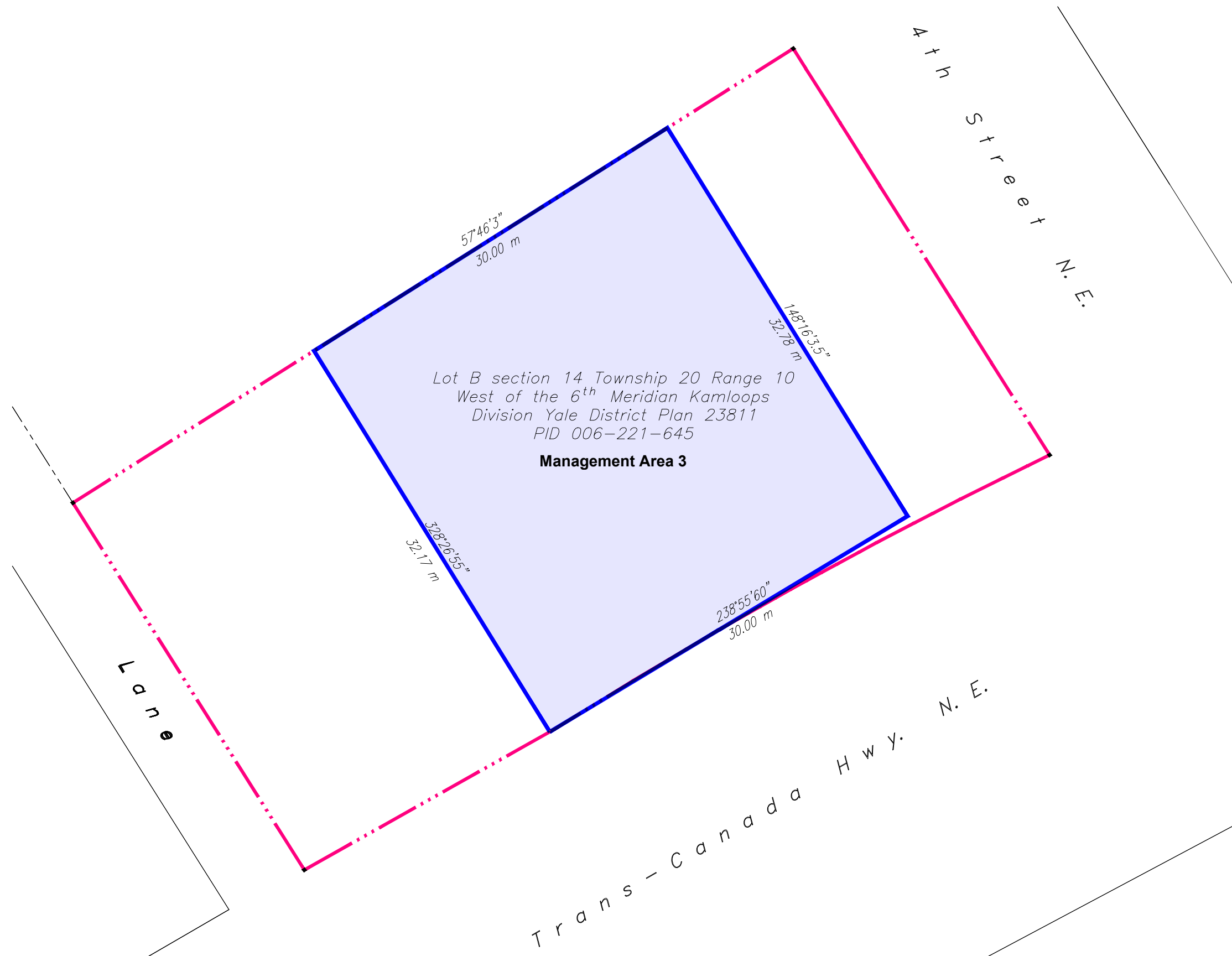


LEGEND

--- Subject property line

— Management Area

2021/12/31 Date format: yyyy/mm/dd



Lot B section 14 Township 20 Range 10
 West of the 6th Meridian Kamloops
 Division Yale District Plan 23811
 PID 006-221-645

Management Area 3

A t h
S t r e e t
N . E .

L a n e

T r a n s - C a n a d a
H w y .
N . E .



Management Area 3		
Imperial Oil Limited		
371 Trans-Canada Highway NE, Salmon Arm, British Columbia		
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PARSONS		Drawing No.: 2

NOTE: All features are approximate.