



May 8, 2023

Fraser Mills Properties Ltd., Inc. No. BC0704848 and
411831 British Columbia Ltd., Inc. No. 411831
3030 Gilmore Division
Burnaby, BC V5G 3B4
Via email: jason.tonin@beedie.ca

Attn: Cody Elder

**Re: Performance Verification Plan for Approval in Principle and Certificate of Compliance
1200 and 1316 United Boulevard, Coquitlam, BC
Project No. 9823**

Keystone Environmental Ltd. (Keystone Environmental) has prepared this Performance Verification Plan (PVP) in support of an application for an Approval in Principle (AiP) for the property referenced as 1200 and 1316 United Boulevard, Coquitlam, BC (the "Site") and for a Certificate of Compliance (CofC) for a metes and bounds portion of the Site that is currently being redeveloped as a temporary sales centre (referred to as "Development Area A"). The metes and bounds for Development Area A is presented in the attached **Figure 23-9823-01**.

With respect to the AiP, the PVP presents the principal risk management measures that apply and must remain in place at the Site until re-development begins and the remediation plan is implemented to ensure that human health and ecological risks remain acceptable under existing conditions. The principal risk management measures contained within the PVP are the same for Development Area A but must continue remain in place to ensure that the CofC for Development Area A remains valid.

The PVP was prepared in accordance with BC Ministry of Environment and Climate Change Strategy (ENV) guidance (BC ENV, 2022). The PVP was based on the findings of the Keystone Environmental (2022) human health and ecological risk assessment (HHERA) report titled *Report of Findings – Human Health and Ecological Risk Assessment, 1200 and 1316 United Boulevard, Coquitlam, BC*.

DETERMINATION OF SITE TYPE

The principal risk control which must be maintained at the Site (including Development Area A) include the following:

- Contaminated soils must remain covered by a minimum of 1.0 m of material meeting risk-based standards or covered by intact pavement or building foundations.

This risk control was put in place to prevent exposure to soil contamination by human and/or terrestrial ecological receptors at the Site (including Development Area A).

Based on this risk control measure for the Site, the Site is considered to be a Type 2 site. A Type 2 site is one that meets risk-based standards under current and future uses through use of institutional or engineered risk controls, apart from the risk controls included for Type 1 sites¹. However, since the risk controls for the Site are associated with the AiP for the Site, the risk controls are only applicable to the Site under the current use until the remediation plan is implemented.

REQUIRED ACTIONS TO IMPLEMENT THE REQUIRED RISK CONTROLS

The following actions are required by Fraser Mills Properties Ltd. and 411831 British Columbia Ltd. to implement the risk controls:

- Mandatory notification provided to the Site owner/operator and workers involved in site redevelopment that soil contamination must remain at least 1.0 metre below grade (mbg) unless covered by intact pavement or building foundations.
- Mandatory annual inspection of the Site by a site operator to ensure risk control is being maintained.
- Mandatory notification provided to the Site owner/operator and workers involved in site redevelopment that if soil contamination is to be removed through excavation, a qualified environmental professional should be retained to characterize the material and advise on proper soil management and disposal.
- Mandatory notification provided to the Site owner/operator to keep and maintain records of risk control maintenance as these records may need to be submitted to BC ENV upon request in the future.
- Mandatory notification provided to the Site owner/operator that the Director must be notified if performance verification actions indicate that there is a failure of the risk control.

Records of risk control maintenance by the Site owner/operator should include the following:

- Scheduled construction activities that have occurred at the Site.
- Description and schedule of inspection and maintenance works conducted at the Site.
- Detailed specifications on any engineering work to be implemented at the Site.
- Quantity and quality of soil or waste managed or disposed of as part of the engineered works.
- Any identified failures in risk control performance along with the measures taken to restore the risk control.

¹ Type 1 sites include those that have an institutional control for limiting the presence of future drinking water wells where the site is serviced by a treated municipal water supply and/or have an engineered control of a maintained and a paved cap covering soil contamination in a municipal roadway or sidewalk.



Suitable forms of record documentation include inspection records, site photographic documentation, engineering drawings/details, communication documents, and related information. This documentation should be recorded at least annually or until an updated HHERA and/or PVP is prepared in support of an application for a risk-based Certificate of Compliance (CofC) for the Site.

SUMMARY RATIONALE

Contaminated soils must remain covered by a minimum of 1.0 m of material meeting risk-based standards or covered by intact pavement or building foundations

Soil contamination exceeding the CSR Schedule 3.1 soil standards for commercial land use (CL) relevant to human and terrestrial ecological health is currently present in soils from across the Site at a minimum depth of 1.2 mbg. The risk assessment assumed that the identified soil contamination would remain at depths of at least 1.0 mbg or covered by pavement or building foundations, which would prevent potential exposures and risks to on-site human and terrestrial ecological receptors. Furthermore, retaining a qualified environmental professional to advise on the proper soil management during excavation would prevent contaminated soils from being relocated to surface and mitigate future unacceptable risks to the environment.

Maintaining communication and inspection records, at least annually or until an updated HHERA and/or PVP is prepared for the Site, is considered a suitable risk management measure.

CONCLUSION

It is our opinion that the actions identified in this report are sufficient to ensure performance verification of the risk controls required for this Site. As such, a contingency plan is not considered necessary and therefore is not provided.

STUDY LIMITATIONS

The findings presented in this report are based upon the field work conducted by Keystone Environmental for Fraser Mills Properties Ltd. and 411831 British Columbia Ltd. Keystone Environmental has prepared this document in good faith and has relied upon information provided by others. Keystone Environmental has assumed that the information provided by third parties is both complete and accurate. This report was completed in a manner consistent with that level of care and skill normally exercised by other environmental professionals, practicing under similar circumstances in the same locale at the time of the performance of the work.

This report has been prepared solely for the internal use of Fraser Mills Properties Ltd. and 411831 British Columbia Ltd., and for review by BC Ministry of Environment and Climate Change Strategy pursuant to the agreement between Keystone Environmental Ltd., Fraser Mills Properties Ltd., and 411831 British Columbia Ltd. A copy of the general terms and conditions associated with this agreement is attached to the end of this report. By using this report, Fraser Mills Properties Ltd., 411831 British Columbia Ltd. and BC Ministry of Environment and Climate Change Strategy agree that they will review and use the report in its entirety.



Any use which other parties make of this report, or any reliance on or decisions made based on it, are the responsibility of such parties. Keystone Environmental Ltd. accepts no responsibility for damages, if any, suffered by other parties as a result of decisions made or actions based on this report.

Sincerely,

Keystone Environmental Ltd.

Kevin Hall, B.Sc., R.P.Bio.
Risk Assessor

Adam Radlowski, M.Sc., R.P.Bio.
Senior Environmental Risk Assessor

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ATTACHMENTS:

- References
- Metes and Bounds Figure



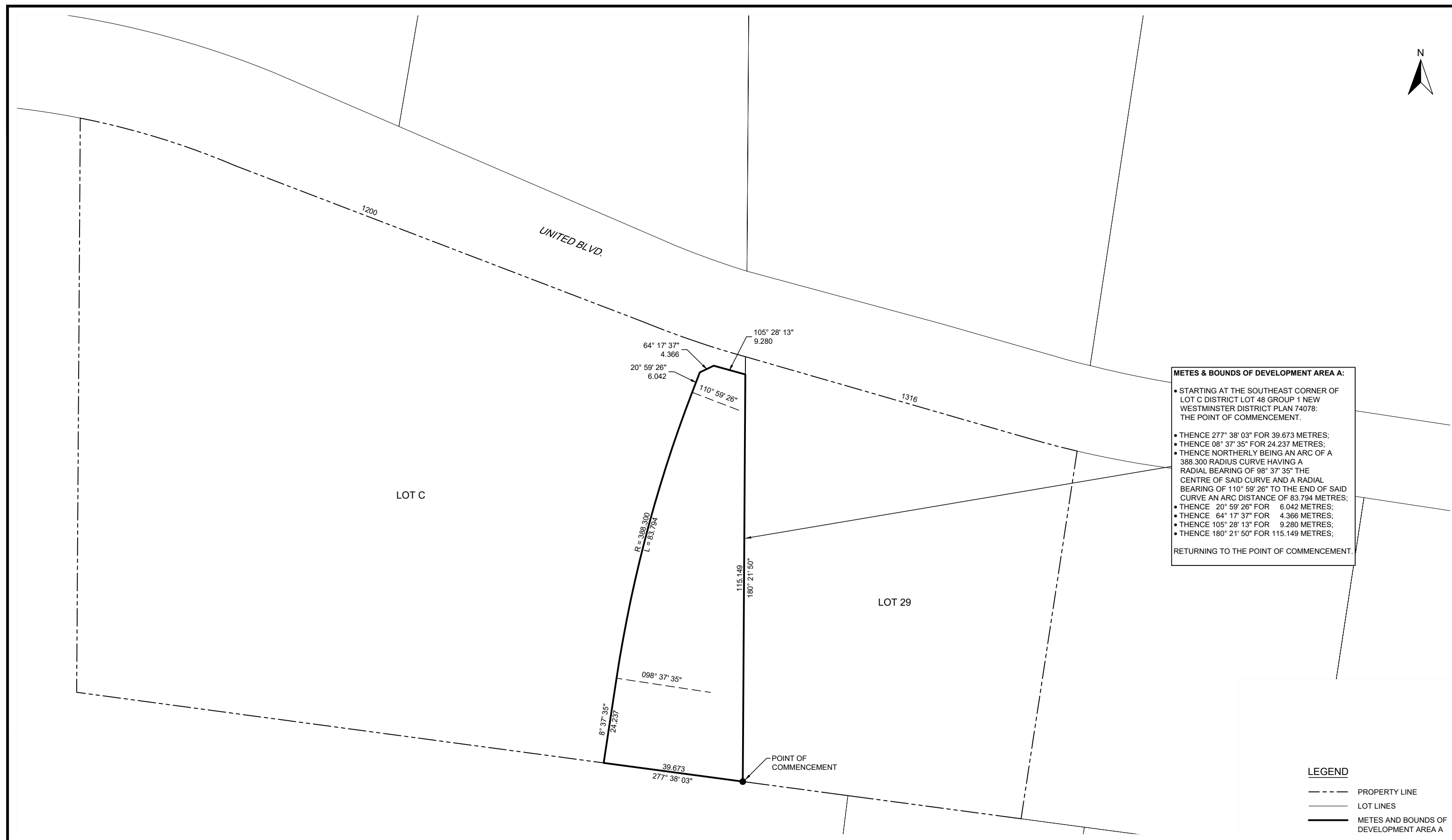
REFERENCES

REFERENCES

- BC ENV. (2023). BC Ministry of Environment and Climate Change Strategy. *Performance Verification Plans*. Retrieved May 3, 2023, from <https://www2.gov.bc.ca/gov/content/environment/air-land-water/site-remediation/remediation-planning/remediation-plan-aip/performance-verification-plans>
- Keystone Environmental Ltd. (2023). *Report of Findings – Human Health and Ecological Risk Assessment, 1200 and 1316 United Boulevard, Surrey, BC*. Burnaby, BC: Keystone Environmental Ltd. May 2023.



METES AND BOUNDS FIGURE



METES & BOUNDS OF DEVELOPMENT AREA A:

- STARTING AT THE SOUTHEAST CORNER OF LOT C DISTRICT LOT 48 GROUP 1 NEW WESTMINSTER DISTRICT PLAN 74078: THE POINT OF COMMENCEMENT.
- THENCE 277° 38' 03" FOR 39.673 METRES;
- THENCE 08° 37' 35" FOR 24.237 METRES;
- THENCE NORTHERLY BEING AN ARC OF A 388.300 RADIUS CURVE HAVING A RADIAL BEARING OF 98° 37' 35" THE CENTRE OF SAID CURVE AND A RADIAL BEARING OF 110° 59' 26" TO THE END OF SAID CURVE AN ARC DISTANCE OF 83.794 METRES;
- THENCE 20° 59' 26" FOR 6.042 METRES;
- THENCE 64° 17' 37" FOR 4.366 METRES;
- THENCE 105° 28' 13" FOR 9.280 METRES;
- THENCE 180° 21' 50" FOR 115.149 METRES;

RETURNING TO THE POINT OF COMMENCEMENT.

LEGEND

- PROPERTY LINE
- - - LOT LINES
- METES AND BOUNDS OF DEVELOPMENT AREA A

NOTES:
 1. THIS DRAWING IS FOR GENERAL INFORMATION ONLY.
 LOT BOUNDARIES AND FEATURES ARE APPROXIMATE.



Keystone Environmental Ltd.
 Ste. 320 4400 Dominion Street
 Burnaby, British Columbia

1200 & 1316 United Boulevard
 Coquitlam, B C

DESIGN	APPROVED
DRAWN AB	CHECKED
SCALE SCALE: 1:1000(approx.)	

CLIENT Beedie Construction Ltd.	SHEET No. 1 of 1
Metes and Bounds of Development Area A	PROJECT No. 9823-04
	REVISION No. 00
	DRAWING No. 23-9823-01

No.	DATE	DESCRIPTION	BY	APPROVED
00	04/17/23	Issued for Client Review	AB	
REVISIONS				