

Contaminated Soil Relocation Agreement Processing Requirements for Approved Professionals

This document outlines the procedures that Approved Professionals should follow when processing an application for a Contaminated Soil Relocation Agreement (CSRA).

When is a CSRA required?

The circumstances that trigger submission of a CSRA application are outlined in Administrative Guidance 7, "Completing and Submitting an Application for a Contaminated Soil Relocation Agreement" and Fact Sheet 41, "Relocation of Soils from Contaminated Sites."

Processing a CSRA application

Approved Professionals should follow five steps when they receive a CSRA application:

- Step 1. Determine if the CSRA application package is complete
- Step 2. Confirm that a CSRA is legally required for the proposed relocation
- Step 3. Determine if the soil to be relocated has been adequately characterized
- Step 4. Assess the receiving site suitability
- Step 5. Submit a recommendation to the Director of Waste Management (the Director).

Step 1. Determine if the CSRA application package is complete

The CSRA application package is considered complete if it includes the following:

- A Contaminated Sites Regulation (the Regulation) Schedule 8 CSRA application form (all sections of Parts I, II and III must be complete).
- A satisfactorily completed Contaminated Sites Services application form, *along with appropriate Contaminated Sites Approved Professionals Society and ministry fees.*
- All required supporting documentation including but not limited to:
 - a summary of historical activities at the source site and list of associated potential contaminants of concern (PCOCs);
 - a site plan for the source site showing the area where soil to be relocated is situated and associated sampling locations;
 - summary tables of analytical results for PCOCs compared to applicable land use standards for the receiving site and Column II or III of Schedule 7, Column III or IV of Schedule 10, and Column II, III or IV of Schedule 11, as appropriate;
 - a risk assessment report for risk-based applications; and
 - associated laboratory reports.

Submission of full preliminary and detailed site investigation reports is not required for a CSRA application; however, information submitted should fully describe the soil to be relocated. Incomplete application packages should be returned to the applicant.

Step 2. Confirm that a CSRA is legally required for the proposed soil relocation

Based on the information provided with the application, confirm that the soil to be relocated exceeds the applicable standards in Schedule 7, 10 or 11 of the Regulation and that there are no exemptions under the *Environmental Management Act* (the Act) or Regulation to the requirement for a CSRA.

Step 3. Determine if the soil to be relocated has been adequately characterized

To determine if the soil to be relocated has been adequately characterized, the Approved Professional should review the supporting documentation provided and evaluate the following:

- Have the current and historical activities at the source site and associated PCOCs been adequately assessed?
- Was a site plan provided showing the sampling locations and area to be excavated?
- Were the soil samples collected as outlined in Technical Guidance 1 or by an acceptable alternate method?
- Were the soil samples analyzed for the appropriate PCOCs?
- Were the soil analytical results correctly compared to the appropriate Schedule 7, 10 or 11 standards?

If the answer to all of the above questions is “yes”, then the soil to be relocated has been adequately characterized.

Step 4. Assess the suitability of the receiving site

The relocation of soil to a receiving site must not cause contamination or significant potential for adverse effects on human health or for pollution of the environment. The suitability of the receiving site must be assessed as follows:

- Where required, was the soil pH at the receiving site determined according to Technical Guidance 5?
- Were the soil analytical results compared to the appropriate numerical or risk-based standards for the receiving site, or will the soil be treated in a soil treatment facility?

The receiving site is suitable if the soil does not exceed any of the applicable numerical or risk-based standards for the receiving site. For soil being relocated to a soil treatment facility, the applicant must provide a statement from an Approved Professional indicating that the design of the facility will fully contain the contaminated soils during treatment.

Step 5. Submit a recommendation to the Director

The Director decides whether or not to enter into a CSRA based on the recommendation of an Approved Professional or ministry staff. Recommendations from an Approved Professional should be submitted as described in Administrative Guidance 5, “[Approved Professional Recommendations Relating to Low and Moderate Risk Sites](#)” and associated ministry policies.

If there are known regulations, bylaws or legal restrictions prohibiting the relocation of soil to the receiving site, the reviewer should advise that the Director not enter into the CSRA.

Note: This document does not replace the Environmental Management Act or its regulations. It does not list all provisions relating to Contaminated Soil Relocation Agreements. If there are differences or omissions in this document, the Act and regulations apply.

If you have questions about CSRAs, please send a message to remediationFAQs@gov.bc.ca.

For more information, contact the Environmental Management Branch at site@gov.bc.ca.