

Total number of surveys received: **53**

1. Executive Committee

- i. Are you aware of situations where APs are being over conservative and rejecting submissions that MOE would accept? If so, would you be willing to assist CSAP in documenting these so that we can share these as lessons learned if they are deemed appropriate? (Either provide details below or provide your contact information so that CSAP can contact you for details.)

Yes	4	8%
No	17	32%
N/A	23	43%
Comments	9	17%

Comments:

- A very open ended question: unfortunately much of CSAP practice falls into realm of "opinion". Please encourage use of references for opinion support;
- PA assessments almost universally lean to conservative interpretation in matters of professional judgement (e.g. cross-gradient distance where offsite surface become a risk to a subject site.)
- Seems likely but cannot prove;
- Hard to tell as MoE is generally conservative but also not consistent across the board. I would say that some reviewers' comments trend towards conservatism. Can't recall what sites though;
- I think we need to define what is "overly conservative". The current protocols/guidelines are very perceptive, so there is very little left for judgement. Question is – are CSAPs personalities showing up on AP work?;
- Spacing of boreholes/wells for delineation. Exercising professional judgement for screening out PCoCs for vapours;
- We generally come to the right decision although it is still sometimes when we need to work through APs wanting to see the work done as they would do it;
- I think this question needs to be asked to professionals working (consulting), MoE and industry (not just APs);
- The process is conservative because there is no direct benefit not to be;
- Yes – not necessarily rejecting, but requiring a level of investigation that MoE would likely consider excessive. Difficult to document this.
- Yes. Marginal APECS and PCOCs; Level of assessment of APECS and associated PCOCs;
- Yes
- Not that I know of;

- No, I think members mostly try to meet MoE requirements or expectations;
- Unnecessary detailed delineation to a sub-metre (level <0.1m); Require to delineate substances that have no exceedance;
- No, urban myth;
- Not specifically, but I am concerned HWR/CSR overlap needs to be addressed soon to avoid unnecessary administrative requirements.

ii. Are you aware of situations where APs are being under conservative and accepting submissions that MOE would reject? If so, would you be willing to assist CSAP in documenting these so that we can share these as lessons learned if they are deemed appropriate? (Either provide details below or provide your contact information so that CSAP can contact you for details.)

Yes	2	4%
No	19	36%
N/A	30	56%
Comments	2	4%

Comments:

- No, but I've "heard" that this occurs;
- No, I think members mostly try to meet MoE requirements or expectations;
- Hard to say. The MoE reviews so few these days, and consultants are exposed to those rarely, it's impossible to say what MoE standard level of care is (with the exception of TG6). I am involved in several MoE reviews files and find their reviews to very inconsistent per MoE staff person, also making it hard to know what their expectations are when acting as an AP;
- I have reviewed historical reports where documents would not likely be adequate for submission;
- Yes - Releases with limited investigation/delineation. Limited investigations at sites with a Director's decision for no investigation required;
- No – Possibly too much effort working with submitting AP in making an assessment "sufficient";
- This should be captured in the detailed screening. Please search Membership Committee's input – various selected matters.

2. New Opportunity or APs.

MoE has opened a dialogue with CSAP regarding a future role for APs in the Ministry's Permitting process. The current task will require CSAP to develop clear methodology as to how AP's could assist in the Permitting Process including Policy for the scopes of work that could be completed by APs and the a practical business case for the completion of all review work.

Would this sort of work be of interest to you

Yes	19	36%
No	34	64%

Interested (number of permit applications): Brant Dorman (2), Gary Lin (3), Michael Sloan (1), Mark Adamson (0), Mike Geraghty (1), James West (0), Lori Larsen (3), Art Hildebrand (2), Richard Kwan (0), Tone Gillett (2), Jason Christensen (3), Robert Beck (2), Tadd Berger (0), Stephan Quaglia (0), Blair McDonald (3-5), Kelly Forseth (7).

Comments:

- Yes, I think it is a good idea for CSAPs to be involved in this to help MoE;
- Need more info.

Would you like join a small group to review and finalize CSAP's proposal? I am interested

Comments:

- No time at this time.

3. Membership Committee

i. Are you interested in joining a committee?

Yes	30	56%
No	19	36%
Already	4	8%

Interested: James Smith, David Newton, Michael Geraghty, Gary Lin, Michael Sloan, Mark Adamson, James West, Lori Larsen, Art Hildebrand, Richard Kwan, Tony Gillett, Jason Christensen, Robert Beck, Tadd Berger, Kelly Forseth, Gary Hamilton, Audrey Wagenaar, Rob Lauman, Ingo Lambrecht, Robert McLenehan (leach tests), Harm Gross, Ajay Tumber, Dawn Flotten, Tom Frkovich, Jim Laidlaw, Michael McLeay, Simone Mol, Takako Matsueda, Paul Webb.

4. TR Committee

i. What technical issues did you experience since last June that you would like the Tech Review Committee to be aware of?

Responses:

- The peat standards – dry weight makes a huge difference;
- Chloride in soil – not as soluble as assumed;
- Delineation of groundwater contamination to drinking water use standards adjacent to a creek;
- Evaluation of applicable standards at site where bedrock is present at shallow depths;
- Definition of "intake" P12;

- Leachate from waste material being assessed as groundwater as representative for a site;
- Arsenic background in groundwater often above standards;
- In common with some others: the difficulty of delineating contaminants (chloride) in peat;
- Background determination in mineralized areas (mine sites) re: delineation for RA;
- Documentation of regional groundwater quality (Se, As) and expensive delineation;
- Inconsistencies between CSAP submission manager and MoE SoSC template, as well as some usability deficiencies;
- Representative sampling techniques protocols such as EPA incremental sampling;
- They have been making good choices to date;
- PCoC naming/spelling consistency;
- Conflict as to appropriateness of Peristaltic pumps for collection of VOCs samples – at shallow, intermediate depths;
- Chloroform showing up in vapour when NO in soil and groundwater;
- Practitioners and Aps thinking it's acceptable to collect groundwater samples for VOCs using a peristaltic pump;
- Common background constituents;
- Peat/organic soils;
- Delineation;
- Peat leachate;
- I see other CSAPs accepting samplings of volatiles (eg BTEX) in groundwater (deeper than 3 meters) via peristaltic pumps. They state this is common practice and supported by CSAP. Is this correct? Clarification to members would be useful;
- Peat and salt standards and analytical issues.

ii. Are you interested in assistance the TRC and what is your area of specialization?

Interested: Laura Koch (Soil),

Patty Carmichael (Hydrology/contaminated site assessment methodology/procedures),

Gary Lin (I specialize in contaminated fate and transport and contaminant hydrology),

Michael Sloan (Specializing in regulatory, soil quality, hydrology),

Robert Beck (applicable guidelines for peat soil (specialization: hydrology and soil science – UBC 1996) or PVP guidelines (or leachate methods)),

Tadd Berger (Master in Env. Mgt. Bachelor in soil science, 19 years international exporters),

Kelly Forseth (remediation design),

Audrey Wagenaar (Human health risk assessment and toxicology)

Ajay Tumber (site investigation and remediation of petroleum hydrocarbon contaminated sites, but not at the present time)

Jim Laidlaw (engineering/assessment)

Michael McLeay (risk assessment)

5. PA Committee:

i. Improving the Performance Assessment Process

The Performance Assessment Committee (PAC) is always looking for ways to improve the Performance Assessment (PA) process, and welcomes input and suggestions from CSAP members. We are now considering documenting the PA findings in a single findings letter for the standards and risk portions, respectively. We believe that this change will streamline the response process of the Stage 1 findings and lead to faster resolution of requests for additional information and clarifications.

Are you in favour of the proposed change?

Yes	32	60%
No	13	25%
Not sure	8	15%

Suggestions:

- Format of letter would need work to ensure that both panel members can comfortably sign without delay;
- Could the PA Committee help with pre-approvals? This can be a significant bottle neck for submissions;
- There are benefits on separating the two. I'm not sure if having a RA digging into DSI or vice versa a good idea. Depends on who 😊
- Allow for non-CSAP project personnel to attend PA meetings. CSAPs tend to be independent so need backup.
- Single report from CSAP (DM to prepare);
- I think it is important for the PA reviewers to document their comments in a letter that they sign themselves. I think this keeps the PA reviews reasonable, because their name is associated with each of their comments. If it's one letter, the individual RA reviewer can hide behind the DM;
- Strongly opposed. Will unnecessarily complicate and slow the process with no material gain for anyone;
- What happens if MoE says they disagree on the professional judgement?

- Findings letter should emphasize the issues that have a material effect on the decision to issue an instrument. Minor corrections/improvements are valuable from a professional development perspective, but should be presented in a separate section of the letter;
- A mechanism for more ready acknowledgement of submitting AP's professional judgement;
- PA prepare two worksheets of findings and the delegated member prepare and issue the final findings letter;
- Absolutely need the DM to integrate findings of panel and distinguish critical issues from "nice to fix".

ii. Use of Professional Judgment for P6 Submissions

CSAP is looking into ways that professional judgment can be used more frequently and effectively when making a P6 submission. The impression is that many members are reluctant to use professional judgment because of the uncertainty of how these judgments may be viewed in a performance assessment or by the ministry.

We would like your input in developing guidance when to use and how to document the use of professional judgment.

Are you in favour of CSAP developing such guidance?

Yes	42	79%
No	5	10%
Not sure	6	11%

Suggestions:

- Guidance on documentation would be appreciated;
- CSAP OFTEN overcomplicates a process. Therefore would need to clarify scope of ref. of proposed guidance;
- How to document Pro. Judgement – OK. When to use Pro. Judgement – not sure. Sample spacing, frequency or similar – maybe.
- On first thought, I am not certain that guidance is consistent with reliance of professional judgement. A challenge with PJ is that we are pressured to defer to policy/guidance. More policy/guidance may simply add to the burden. PJ shall rely on scientific principles.
- Define professional judgement first. Members and stakeholders likely have different definitions. It is not "getting away with something". Members are very well qualified and have qualified with at least a decade of experience.
- Excellent initiative! Ideas: 1) Daslers should not judge submissions; 2) Perspective is missing when PA'ers adopt extreme positions + are be default assumed correct; 3) Consideration should be given to the fact no investigation or remediation is scientifically defensible + so forcing an issue may be unwarranted.

- Must be technical in basis to documented site data to support; "Reasonable" Professional judgement should not be "punished" if not approved by reviewers; This will be difficult as there is a wide range of technical abilities, training and experiences within CSAPs, with some judgements above the ability of some others to adjudicate;
- Should identify which protocols were deviated from and why, referencing other guidance as appropriate;
- You would need enhanced liability protection;
- Expectation for documentation is where guidance is most needed;
- Our members have a wealth of professional and technical experience. Clients pay for this experience. To not use that experience suggests a flawed system to me;
- There is an easy way of doing this. I have been involved in other organizations and can provide some suggestions
- If can backup professional judgement with scientific argument, should override any CSR guidelines, protocols, etc.;
- "Level of detail" in assessing sites and defining delineation;
- It would end up so vague that it wouldn't really make any material difference for APS or reviewers;
- Documenting areas where professional judgement has been used as part of technical reports;
- I think it would be helpful if CSAP can develop more guidelines/fact sheets on evaluation of APEC/PCOC investigation methodology, well spacing, post remediation sampling;
- Absolutely need all parties to exercise more judgement – difference of opinion are just that unless it would lead to a change in conclusion.

iii. Have you been using the Annotated Summary of Site Condition?

Yes	42	79%
No	11	21%

The Annotated SoSC is available on the CSAP website at:

<https://csapsociety.bc.ca/members/guidance-documents/> . It provides instructions on how to complete the SoSC, including additional information now required by the BC MoE.

Comments:

- A dropdown menu for PCOCs would be helpful;
- The annotated SoSC needs to be clear that it is not so comprehensive as to cover all situations and be followed verbatim;
- I use as a reference;
- Could be further expanded;
- Very useful!
- Good job!
- This is a huge help. Just needs to be kept current with ministry decisions – this is possibly being done already;
- Annotations need to be included in the Submission Manager to clarify and instruct usage;

- Annotations reflect current practice. It seems like it may be time to update the SoSC itself to address divergences between past and current practices;
- I think this document is very helpful and useful. Need more similar documents. CSAP should consider doing the same for CoCs and other forms.

6. PD Committee:

i. Have you attended or attend the CSAP Webinars?

Yes	49	92%
No	1	2%
N/A	3	6%

ii. Did you find the webinar(s) helpful?

Yes	49	92%
No	1	2%
N/A	3	6%

iii. Is there any PD Webinar topic that you would like to see covered? (include it below)

Responses:

- The webinars to date re: common submissions errors in AP submissions has been so vague and high level to not be helpful. A more detailed presentation with real examples is warranted;
- Data quality control and uncertainty;
- PVPs and risk management conditions in CofCs;
- Omnibus amendments;
- How to deal with soil/groundwater exceedances of constituents that were not initially considered as PCOCs and could be anomalies;
- Offsite migration from crownland from one Ministry onto another Ministry's jurisdiction crownland (i.e. MoTI lands onto MFLNRO);
- Stage 10 Amendments;
- Professional Judgement;
- Preparing draft instruments; Evaluation of APEC/PCoCs; Vertical delineation of GW contamination;
- CSR overlap/interaction with WDR;
- TG4 Update; Ongoing lessons learned;
- Give in the detailed screening training! No sense having select few in the know.

- iv. As part of good corporate citizenship, the PD Committee has offered to explore possible philanthropic activities that CSAP could support. Do you support this initiative and if so, do you have any suggestions as to which organization or activities CSAP should consider?

Responses:

- Do not support;
- I am not sure a non-profit should be considered a "corporate citizen". It's not CSAPs role to take funds from our clients and give to charities;
- I think the money should be funnelled back to reduce membership fees;
- No, if CSAP has excess funds, they should invest in members: e.g. increase hourly rates, pay for more of the work conducted, conduct more researches;
- Not really. Recommend using skills we have in outreach. For outreach we could extend our scholarship program;
- Definitely! Habitat for Humanity, Doctors without Borders, Engineers without Borders (water wells);
- Yes. Social Housing (e.g. Pro-bono Brownfields work); Land/Habitat conservation; Mentoring of refugee professionals;
- Yes, Food banks, providing funding to obtain clean drinking water;
- Lifewater Canada! Providing clean drinking water in developing nations;
- Yes;
- Yes, Children Hospital;
- Shoreline Cleanup;
- Support, but keep it local in BC;
- Yes, I support: Associated with the work the Society does;
- I believe that the scholarships are appropriate and adequate as the primary CSAP philanthropic activity;
- Maybe offer a fund for landowners of limited means to assist with risk remediation?
- I support the concept;
- Yes, maybe groundwater related. Numerous First Nations do not have access to clean water supply;
- Yes! Boy Scouts and Girl Guides – they promote good stewardship of the environment. Maybe Soul Foods (or the like)
- Offering expertise to First Nations without the means to pay for service;
- I do not support this initiative (except for scholarships and related);
- Yes, still thinking of something;
- No;
- Yes – educating students about contaminated sites;
- Yes. Industry, Municipalities, Education Institutions, Legal, Developers/Architects, Foreign Investors;

- Habitat for Humanity; redevelopment of brownfield sites for social housing;
- No. We are supposed to be non-profit and should not be accruing revenues to the give away. Scholarships are an exceptions.
- Yes;
- Investigation/remedial funding for non-profit societies.

7. Town Hall – additional comments welcome

i. What improvement do you think would have the biggest impact on CSAP?

Responses:

- Improving the discussion forum on the CSAP website to be easier to use, more interactive and searchable;
- Streamlining submission process;
- Golf Tournament?
- Reduction of paperwork; Be very selective on what actions/activities are to be taken on from BCMoE;
- Extending membership timeframes based on critical PD hours;
- CSAP needs to make sure it is fully compensated for doing work that directly benefits MoE and should be supported by the government;
- Not sure what kind is being asked. I am presuming positive;
- Ministry relationship/Professional Judgement;
- Use of Professional judgement by CSAPs. Current requirements follow CSAR so closely, CSAP are to be conservative and wait on MoE input for final decisions;
- Continuing to try and improve the way the MoE provides info in advance to CSAP, how they ask for CSAP advice, and how they listen to that advice;
- Look at increasing the “nontechnical” rate of \$110/hr with inflation; Look at increasing the scope of items Aps can complete to count towards their minimum 1 submission per 3 years, especially as our review/signatures are requested on a broader scale by MoE;
- Keeping documents updated (SoSC, CoC templates); Develop more annotated documents (CoC, NoM, NIR, SRCR, etc); Dissemination of information similar to CS-Elink (i.e. send emails when new update are posted on CSAP website);
- Improved relationship between MoE and CSAP – seems to be a level of mistrust;
- Focus on outcome and goals vs process.