



SOCIETY OF CONTAMINATED SITES APPROVED  
PROFESSIONALS OF BRITISH COLUMBIA

# Performance Assessment Committee Update

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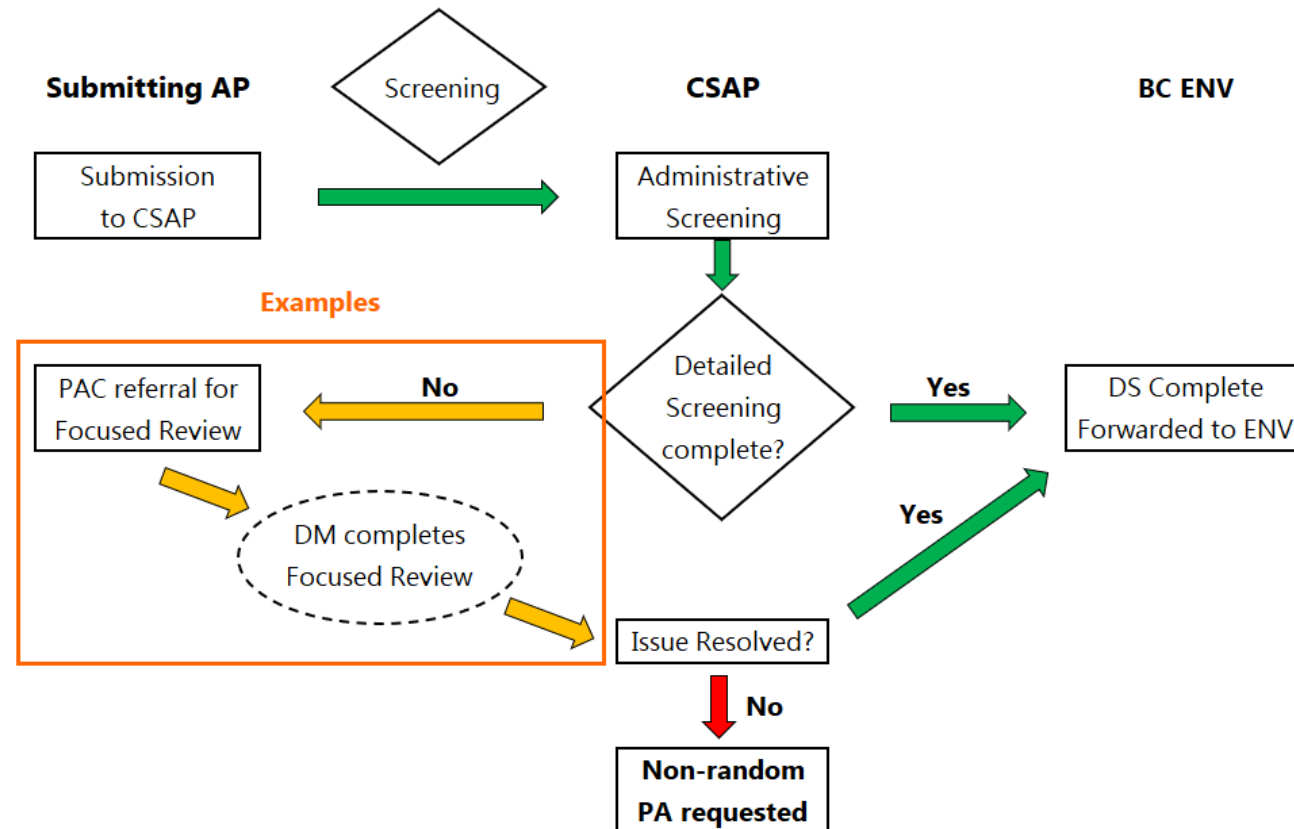
# Submission Metrics to Date



- For Fiscal Year 2022-23 (Apr 1 to Nov 4, 2022 [7 months])
- 92 Submissions Received
  - 15 Performance Assessments (PAs)
  - 2 Focused Reviews (FRs)
  - 3 Non-random PA (NRPAs)
- 2 FRs:
  - 1 ended in NRPA, other still being resolved
- 3 NRPAs:
  - 1 from FR, 1 from PA measures, 1 at request of ENV

# Review of PA Process – Focused Reviews (FRs)

- Members may not be familiar with FRs in the CSAP Process
- Examples of FRs and Outcomes





# Review of PA Process – Focused Reviews



1) When Identified?

*Detailed Screening or at request of ENV  
Referral made to PAC*

2) Who completes them?

*A Delegated Member that sits on the PAC*

3) How long do they typically take?

*5 – 10 business days depending on the issues and  
the potential need for ENV involvement*



# FR – Example 1 Submission



- Risk-based COC Submission with off-site Affected Parcel
- Source Parcel in fee simple under Provincial jurisdiction
- Off-site Affected Parcel on VFPA land under Federal jurisdiction
- Submission included email communication with VFPA that a COC would not be required for their property, given it was characterized, risk assessed and on federal land





# FR – Example 1 Issues Identified

- Submission did not include the entire extent of contamination as per P6
- Required a P6 Pre-Approval from ENV
- FR prompted during Detailed Screening
- To understand the off-site issue, DSI was reviewed
- Questions raised on TG8-level delineation of groundwater contamination
- Submission was ‘Deficient’ and required re-submission with NRPA



# FR – Example 1 Outcome



- P6 Pre-Approval obtained from ENV
- Additional groundwater investigation completed
- Re-submission
- ‘Additional Information Required’ at Stage 1
- All Stage 1 Findings were addressed with an updated Risk Assessment
- NRPA Final finding was ‘Sufficient’




# FR – Example 2 Submission & Issues




- Numerical AIP within a numerical COC area
- AIP included future remediation after building was to be demolished
- No contamination identified within COC area
- Submitting AP was unfamiliar with submission requirements and expected the COC area to be a conservative approach
- During Detailed Screening, the incorrect Instrument was identified
- FR recommended





# FR – Example 2 Outcome




- Data within COC Area supported an application for a Preliminary Determination instead
- Submitting AP was contacted to revise recommendation to a Preliminary Determination
- Went through Detailed Screening with revised ENV documents and correct draft Instruments
- NRPA not recommended

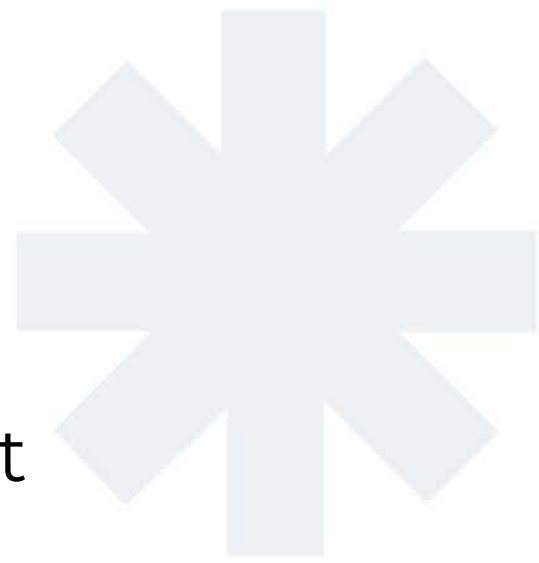


# FR – Example 3 Submission & Issues

- Numerical COC application
- During Detailed Screening, vapour attenuation factors (VAFs) were found not to have been included in Section 4.4 of the SoSC
- Through email correspondence, vapour investigation for future use was questioned
- FR recommended



# FR – Example 3 Outcome




- Additional vapour investigation completed but found not to be required
- No residual vapour source remained onsite
- Previous vapour source was within contaminated fill that had been removed from Site
- No vapour source in native soil identified
- Issues resolved in Detailed Screening
- NRPA not recommended



# FR – Example 4 Submission & Issues



- Numerical COC application
- DW not applicable to the Site
- Insufficient information provided in Section 4.2 of the SoSC to confirm inapplicability
- Not resolved during Detailed Screening
- FR recommended for applicable water use standards



# FR – Example 4 Outcome



- Hydrogeology section of DSI reviewed
- Sufficient information provided in DSI report
- Submitting AP requested to revise SoSC
- Detailed Screening completed
- NRPA not recommended





# Focused Reviews Takeaways

- Issues typically identified during Detailed Screening, but can be requested by ENV
- Reports and supporting information relevant to the issues raised are reviewed by a DM
- CSAP strives to make it a learning opportunity for members
- Most issues are resolved through Detailed Screening, but exceptions can result in an NRPA



# Focused Reviews as part of CSAP's Process

## QUESTIONS?



# Contaminant Migration Communications



- Members are reminded of Communication Expectations for Affected Parcel Owners
- Similar to previous Administrative Guidance 11
- Information can be found under the '*Contamination Migration*' tab on ENV's webpage
- Checklist for Source Parcel Responsible Persons and Affected Parcel Owners
  - Emails for cooperative affected parcel owners
  - Registered mail recommended for uncooperative affected parcel owners



# Contaminant Migration Communications



- Requirements and Expectations for Source Parcel Responsible Persons
  - Delineate and remediate full extent of contamination
  - Provide NOMs, SRCRs, and NIRs
  - Communicate remedial strategy, plan and schedule
  - Where Instruments are sought for Affected Parcels provide communication record to ENV
  - Provide copies of any Instruments obtained to the Affected Parcel Owners



# Contaminant Migration Communications



- Advice and Expectations for Affected Parcel Owners
  - Obtain legal and technical advice with professional familiar with BC contaminated site requirements
  - If you are aware of migrating contamination, but have not been contacted by the Source parcel owner, contact them and request information
  - Review information on your rights, obligations and liability exposure
  - Undertake an independent review of investigation and remediation work at your affected parcel for verification





# Contaminant Migration Communications



- REMINDERS

- ENV reviews communications under the lens of Administrative Fairness
- Communication Record is to be included in the list of reports within the SoSC and in Schedule D of the draft Instrument
- Issues that are perhaps not resolved during Detailed Screening are deferred to ENV

A hiker with a backpack is seen from behind, walking on a rocky mountain trail. The background shows a vast mountain range under a clear sky. The image is partially obscured by a green and blue geometric overlay.

# Contaminant Migration Communications



QUESTIONS?

# PAC Update

Questions? Please contact PAC Chair  
[PAC@csapsociety.bc.ca](mailto:PAC@csapsociety.bc.ca)



# CSAP