



SOCIETY OF CONTAMINATED SITES APPROVED
PROFESSIONALS OF BRITISH COLUMBIA

Review Services Committee Update

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RSC Members



- APs: John Taylor, Brant Dorman, Mike Geraghty, Stephan Quaglia, David Newton, Eva Gerencher, Ajay Tumber
- ENV: Colleen Delaney, Heather Osachoff
- CSAP: Patricia Fu, Anna Popova

Topics to be covered



Will recap what types of reports
RSC reviews



The RSC review process



Statistics to date



New CSAP reminder process



Background



- Why was the RSC formed?
- What is a Director's Requirement?



Director's Requirement

- Reviewing reports and statements that must be submitted to meet a director's imposed requirement on a non-high risk site, such as those requirements found in Certificates of Compliance (CoCs) and Approvals in Principle (AiPs)
- Not P6 work



From a CofC

“A statement signed by an Approved Professional shall be submitted to the Director on an annual basis within 90 days of the anniversary of the date of issue of this Certificate. The report shall be by an Approved Professional and shall include supporting documentation and the following:

a) A summary of the results of inspection and maintenance of any risk management and treatment works”



Clause from a AIP



- A report signed by an AP must be submitted for review to **the Director** annually..... of the date of issuance of this Approval in Principle. The report must include the following:
 - (a) A summary of remedial activities undertaken during the reporting period;
 - (b) An assessment comparing remediation progress to the actions and schedule set out in the plans referenced above.
 - (c) Supporting documentation (e.g., analytical reports, records of inspection, maintenance of treatment works, etc.).



Timing and Frequency



- RSC went live Jan 31, 2022
- Actual future numbers unknown but expected about 30 or 40 the first year
- Potentially more (or less) in subsequent years
- However, ENV policy changes can impact numbers

What RSC Reviews

Approved Professional Statements	Requirement usually from an instrument but could be imposed in other ways by Director	Non HR, non HR Managed, non SDS related Various types: monitoring, progress, annual, quarterly, monthly, biennial, triennial, etc.. Also Closure reports
Monitoring Reports	same	same



What we don't do



Reporting requirements
out of permits

Modifications to
Remedial Plans/AIPs

- Extensions to due date
- AIP extensions beyond 5 years
- Requests to Modify Director's requirement

Review Process

RSC assigns a reviewer

If necessary, they ask for clarifications

That has on occasion led to revised application documents

We prepare our review

Everything forwarded to ENV

SDM at ENV considers our review and prepares their decision letter



Visit CSAP web page



- Check CSAP/RSC web page
- Questions can be sent to CSAP or ENV
- Will find RSC transmittal document and checklist for this type of work
- Fee schedule
- Request to Modify Director's Requirement – be sure to read the RSC web page



Application Process



- Documents listed on the Transmittal
- Reporting that considers the checklist
- CSSAF
- Cheque
- SRCR unless exempt
- Submitted same as you do with a P6 submission (electronically to CSAP with mailed cheque)

Stats Since Initiation

Received 18 in first 9.5 months

Increasing trend (maybe)

13 completed and forwarded to ENV

- 65% came out of CofC requirements
- The rest from AIPs
- 15% were older than 5 year
- 15/18 required an AP
- 60% required asking questions

Ongoing

Expecting increased numbers due to the increase in AIPs the past year

CSAP reminder process (90 day)

For 2022 applications. CSAP not going further back than above

Responsibility to remember Director's requirement is always with the submitters not CSAP

Going Forward – Meet SDMs



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Questions?