

CSAP Submission 101:

The Basic Requirements under Protocol 6 for Instrument Recommendation Submissions

CSAP contaminated site instrument issuance recommendations under MoE Protocol 6 require myriad support documents and materials. Both novice APs and experienced APs who make these recommendations regularly require help to confirm that their recommendation packages are complete.

This document identifies issues to help APs prepare and submit complete contaminated site instrument recommendation packages under Protocol 6. Because package requirements may change, this document will be subject to change. APs are reminded that this document is for information purposes only. Although CSAP Society will endeavour keep the document up to date and correct, it is the recommending AP's responsibility to ensure that his or her recommendation package is complete and that it meets requirements in effect when the recommendation is submitted.

Ministry Administrative and Other Guidance

- These documents explain requirements and procedures APs should follow when submitting recommendations to the Director of Waste Management for a non-high-risk site.
 - [Admin Guidance 3 - Applying for Contaminated Sites Services](#)
 - [Admin Guidance 5 - Approved Professional Recommendations Relating to Low and Moderate Risk Sites](#)
 - [Admin Procedure - Establishing Boundaries of a Site](#)
 - [Protocol 6 – Eligibility of Applications for Review by APs](#)
 - [Ministry Questions and Answers \(Q&As\)](#)

Transmittal Letter

- The CSAP Society transmittal letter template lists required and recommended submission elements and can help with assembling the submission package.
- CSAP Society recommends that submitting APs include a transmittal letter with each submission.
- Including a submission transmittal letter is not mandatory.
- A transmittal letter template that may be used by APs is provided at the following link:
 - [Transmittal letter](#)

Review of Findings (RoF) Report

- A Review of Findings (RoF) report is written by a recommending AP to document the review process and identify professional judgment and other issues that are relevant to the recommendation and that are not clearly articulated by the submission support documents.
- The RoF report is not included with the submission but instead is retained in the submitted AP's files.

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- If the submission is selected for a Performance Assessment (PA), the recommending AP may choose to forward the RoF report to CSAP Society for the PA reviewers to assist them with their assessments.
- A RoF report may expedite the PA process, potentially reducing review time for the Stage 1 Report, if no or minimal additional information is requested by the PA Stage 1 Report.
- Completion of a RoF by an AP is not mandatory.
- A RoF Report template that may assist APs is provided at the following link:

a. [Arms Length Review](#)

Required Ministry Submission Documents

P6 Eligibility	Confirm that written Ministry pre-approval is appended to applicable support documents when such pre-approval is required
Contaminated Sites Services Request Form (CSSRA)	Mandatory for all submissions
Summary of Site Condition (SoSC)	Mandatory for all submissions ¹
Site Risk Classification Report (SRC)	Mandatory except for Determination of not contaminated site
Exposure Pathway Questionnaire	May be required based on responses identified on the completed SRC
Notification of Initiation/Completion of Independent Remediation (NIIR/NCIR)	Generally mandatory using the Ministry forms except for some exceptions such as when working under an AiP; or when working in response to a spill that has been reported under PEP; or when NIIR or NCIR have been previously submitted and they continue to be applicable and complete; or when NIIR or NCIR notices appear in a Site Registry report and they continue to be applicable and complete, etc.
Notification of Offsite Migration	Generally mandatory using the Ministry form except when migration notices appear in a Site Registry report and they continue to be applicable and complete
Draft Instrument Cover Letter (available here for members only)	Mandatory
Draft Instrument Template (available here for members only)	Mandatory
Technical Guidance 10 (PSI Checklist)	Mandatory except for Contaminated Soil Relocation Agreement and CoCs based on AIPs
Technical Guidance 11 (DSI Checklist)	Mandatory except for Contaminated Soil Relocation Agreements, Preliminary and Final Determinations, and COCs after AIPs
Contaminated Soil Relocation Agreement (CSRA)	Mandatory for contaminated soil relocation to a non-approved location or facility

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***Notes:**

¹ Only one SoSC is required when multiple instruments are requested under a single CSSRA form where the instruments are based on a common set of reports. Ensure that SoSC information is organized clearly by instrument area.

Changing the SoSC form (such as revising form headers or existing text is not permitted but addition of i.e. lines to existing tables and addition of explanatory notes within existing sections is permitted.

Latitude and longitude should indicate the centre of site

Metes and bounds descriptions should define the portion of the instrument area and the name of the surveying firm must be identified.

Required Supporting Reports

Instrument	Reports
Approval in Principle (Standards)	PSI ² DSI Remediation Plan
Approval in Principle (Risk)	PSI ² DSI Screening Level or Detailed Risk Assessment Remediation Plan
Certificate of Compliance (Standards)	PSI ² DSI Confirmation of Remediation
Certificate of Compliance (Risk)	PSI ² DSI Screening Level or Detailed Risk Assessment Confirmation of Remediation
Certificate of Compliance with an Approval in Principle already in place	Confirmation of Remediation ¹
Preliminary and Final Determination	PSI ²
Contaminated Soil Relocation Agreement	Investigation Report for source site and characteristics (as per CSRA and SoSC) of the receiving site/location Soil Relocation Agreement

***Notes:**

¹ If the submission is quality assessed, copies of the AiP and the Remediation Plan for the Pas must be provided to the CSAP Society

² If the Stage 1 PSI is more than 6 months old, a PSI Update may be also required.

Documentation of professional judgment exercised that differs from written Ministry guidance or standard industry practice should be included along with relevant Ministry correspondence. The documentation is important for completion of the reporting and to reduce the potential for processing delays, particularly should the submission be selected for PA.

The [Ministry FAQ](#) provides additional information that may be helpful.

Required Legal Site and Site Registry Information

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Note: A membership is required and applicable fees must be paid to access the following files from BC Online.

- Current (within 6 months) printout of applicable [Land Title Office Record](#)
- Copy of applicable [Land Title Office Legal Plans](#) or other land survey results
- Current (within 6 months) area-based [Site Registry Search Results](#) (0.5 km radius)
- Current (within 6 months) [Detailed Site Registry Search Results](#)

Document Information Presentation

- The completed Ministry Draft Instrument template, Ministry Draft Instrument Cover Letter, and SoSC in both hard copy and on DVD in Word format (pdf format acceptable for the SoSC) must accompany the reports.
- Draft Instrument Schedule A (site location map) on DVD is no longer required as a separate file (as long as the image is in the draft instrument word doc that is provided on the DVD)
- List substances according to medium (soil, sediment, groundwater, vapour), class (if substance classes are listed by the applicable CSR Schedule), and alphabetically
- Identify applicable Draft Instrument Schedule B conditions

Payment of Fees

- Make cheque payable to CSAP Society for applicable [CSAP Society Fees](#)
- Make cheque payable to Minister of Finance for applicable [Ministry fees](#)
- Confirm with Ministry before submitting fees for multiple-instrument submissions

CSAP Society Submission Screening

CSAP Society screens each instrument submission that it receives under Protocol 6 to ensure that the proper documentation has been included in the submission, that descriptive information about the site is presented consistently, and that the Ministry Draft Cover Letter and Draft Instrument templates have been correctly completed.

The submitting AP will be sent a list of required edits, if any, that must be completed before the submission can be sent to the Ministry for final review and instrument release.

The submission will be held by CSAP Society until all required edits are completed. If no correspondence from the submitting AP is received by CSAP Society in a timely manner, CSAP Society may deem the submission to be incomplete and return it to the submitting AP. If CSAP Society deems a submission to be incomplete and returns it to the submitting AP, payment of a CSAP Society resubmission fee (currently \$500) will be required for the CSAP Society to process the submission when the required edits are finally completed and the submission resubmitted to the CSAP Society.

Top 3 difficulties with submission documentation:

1) The applicant's, owner's and agent's information in Part A, D and signature block of Application Form should match Part 1, Cover Page, of Summary of Site Condition:

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- a) **Owner** is the person (organization) listed in LTO Records and should be put in Part 1, Cover Page, of SoSC, Application Form, and Site Risk Classification Report. Owner signs SoSC or provides a letter of authorization for an agent to sign SoSC. As well, the owner should be the address in the instrument cover letter, with a copy to agent and AP.
- b) **Applicant** is the person listed in Part 1, Cover Page, of SoSC . The Application Form Part A should contain applicant's name. Applicant signs Application Form. Released instrument is addressed to the Applicant.
- c) **Agent** is the person listed in Part 1, Cover Page, of SoSC. He can sign Application Form, but released instrument will be still addressed to an applicant. He can sign SoSC with written consent of the owner.
- d) **Lessee**. In general, the person commissioning the work or their agent may sign section 8.2 of SoSC. To clarify the association with the site in question the wording <the owner / as the agent on behalf of the owner / lessee> should be struck out completely and appropriate wording be penned in above (i.e. owner, lessee or agent of source property; previous site owner; company responsible of a spill; etc.)

If the lessee is not listed in LTO Records, and if the site is being remediated to risk-based standards, or if there are offsite impacts, written consent from the owner should be provided.

2) **Site Plan** and **Location Map** should meet the following requirements:

- a) Oriented north, clearly labeled with a north arrow;
- b) Include scale and street names;
- c) Site boundaries identified with continuous bold line on Site Plan; site clearly marked on Location plan;
- d) Location Map contains enough information so location can be found easily by car;
- e) No logos;
- f) Black and white, suitable for photocopying.

3) **Substances** in Schedule C should be listed according to MoE templates:

``Under separate bullets list them by substance class and alphabetically as they appear within each substance class. List only those substances identified in Schedules 4, 5 and 10(for soil); Schedules 6 and 10 (for water), Schedule 9 (for sediment); Schedule 11 (alphabetically) for vapour. ``

Example:

- Antimony, arsenic, iron, manganese and magnesium; and
- Benzene and ethylbenzene.

Selection Process for Performance Assessments (PAs)

1 in 10 (standards) and 1 in 5 (risk-based) applications are randomly chosen for PAs.

CSAP Society notifies submitting PAs immediately when a submission is selected for PA.

Ministry may also conduct random or targeted audits of submissions.

Ministry may also request that CSAP Society conduct a PA of a submission not randomly selected for PA.