

1 Definitions

The following are the acronyms used in this document:

"AP"	Approved Professional
"AS"	Administrative screener
"BC ENV"	BC Ministry of Environment and Parks
"CSAP Society" or "the Society"	The Society of Contaminated Sites Approved Professionals of British Columbia
"CSR"	Contaminated Sites Regulation
"DAS"	Detailed administrative screening
"DM"	Delegated member of the Performance Assessment Committee
"DS"	Detailed screener
"DSC"	Detailed screening coordinator
"FR"	Focused review means a review by a PAC DM to evaluate unresolved issues brought up in a detailed screening; or, requested by the BC ENV
"NRPA"	Non-random performance assessment
"PAC"	Performance Assessment Committee
"PAP"	Performance assessment panel
"PA"	Performance assessment
"PA Coordinator"	CSAP Executive Director
"PAS"	Preliminary administrative screening
"RPA"	Random performance assessment
"SoSC"	Summary of Site Condition
"Submission"	Contaminated sites certification document made pursuant to the <i>Environmental Management Act</i>

2 Introduction

The Society of Contaminated Sites Approved Professionals of British Columbia ("CSAP Society" or "the Society") is responsible for maintaining quality standards of Approved Professionals ("AP") Submissions recommending issuance of Contaminated Sites Regulation ("CSR") certification documents. On behalf of the BC Ministry of Environment and Parks ("BC ENV"), the CSAP Society conducts preliminary administrative screening ("PAS") and detailed administrative screening ("DAS") of Submissions as per BC ENV requirements and guidance. The screening of the Submissions involves a review of the BC ENV submission documents, as

well as a review of other supporting information (e.g., communication summaries, Performance Verification Plans), and does not include the review of any of the technical reports.

Once a submission is received by CSAP Society, it cannot be withdrawn. Extenuating circumstances may be considered. Under such circumstances, the submitting AP(s) must provide detailed rationale for their request to withdraw. A delegated member (DM) of the CSAP Performance Assessment Committee (“PAC”) will review the rationale and provide a recommendation to the CSAP Executive Committee for a decision.

3 Purpose and Scope

The PAS is undertaken by CSAP Society’s administrative screener (“AS”) and involves checking that all the required documents and materials have been included, that the most recent templates were used, and that the address, legal description etc. are correct and consistent across all documents.

The DAS is undertaken by an AP detailed screener (“DS”) who has been pre-qualified to act as a DS by the PAC. The DAS involves reviewing the Summary of Site Condition (“SoSC”), the draft certification document and other required forms and documents for completeness and consistency.

4 Stages of Screening

The screening is conducted in two stages consisting of a PAS, followed by a DAS. A flow chart of the screening process is included as Figure 1.

5 Information Supplied for the Screening

Submitting APs must submit a document package along with their Submission which will include all the pertinent documents as outlined in the mandatory CSAP Transmittal Letter (available on the CSAP Society’s website) including:

- Contaminated Sites Services Application Form
- Draft Certification Document Cover Letter – Word version
- Draft Certification Document – Word version
- Summary of Site Condition – BC ENV’s fillable PDF
- Site Risk Classification Form (not required for negative Determinations)
- Technical Guidance 10 (PSI checklist)
- Technical Guidance 11 (DSI Checklist)
- Land Title Office legal plan(s) or other land survey results (current title within last 30 days)
- Area Based Site Registry Search, 0.5 km radius (current search within the last 6 months)
- Detailed Site Registry Search (current report within the last 6 months)

And as applicable:

- Performance Verification Plan
- Notice of Independent Remediation (Initiation and Completion)
- Notice of Off-Site Migration
- Communication records for affected parcels
- Consent of both owners to join sites
- Typical Borehole Log for ENV mapping project
- Preapproval and Approvals required under Protocols (2, 3, 4, 6, 7 and 9)
- Other as Applicable: (e.g., covenant on land title, prior issued instruments, etc.)

6 Preliminary Administrative Screening (PAS)

Every Submission received by CSAP Society undergoes a PAS, conducted by the AS, according to a certification document specific Preliminary Administrative Screening checklist, which is attached in Appendix A.

The AS will focus on:

- Completeness of the application package.
- Consistency of the application information.

Once the PAS is complete, comments are provided to the submitting AP(s). When the corrected documents are received, the submission is sent to a DS for a DAS.

7 Detailed Administrative Screening (DAS)

The DAS is conducted by a DS to ensure that the Submission is complete and meets the requirements for the issuance of a certification document. The DAS is conducted using the Detailed Screening Spreadsheet (“DS Spreadsheet”) that is comprised of five worksheets: the Summary Worksheet; the Detailed Screening Checklist Worksheet; the Summary of Site Condition Worksheet; the Regulatory Considerations Worksheet; and the Consultations Worksheet. The Summary Worksheet is where the DS compiles any items requiring clarification from the various other worksheets. A copy of the DS Spreadsheet is attached in Appendix B.

The DAS is not a technical review and the reports prepared in support of the Submission will not be supplied or reviewed. The DAS is conducted based on the information provided in the documents listed in Section 2.3, particularly the SoSC.

CSAP Society has prepared an Annotated SoSC which has been circulated to members and will be updated as required (available at <https://csapsociety.bc.ca/submission-package-forms/>). The Annotated SoSC provides examples of information that BC ENV requires to be included in this document. The role of the DS is to ensure that the draft certification document, SoSC and

supporting documents meet the documentation requirements for the issuance of the certification document.

7.1 When Clarifications are Requested by the DS

Once the DAS is complete, and if any clarifications are required, an email will be sent along with the completed DS Spreadsheet to the AS. When the DAS identifies items requiring clarification, the AS will forward the Summary Worksheet (i.e., a compilation of the items requiring clarification from the other worksheets) from the DS Spreadsheet to the submitting AP(s). The submitting AP(s) is then expected to respond by either supplying clarification and/or corrected information, or by providing rationale as to why it is not required.

The submitting AP(s) is required to submit a response to the AS in a timely manner. If no response is received within one month, an email will be sent to the submitting AP(s) and their alternate contact (e.g., Project Manager) indicating that at the two-month mark the client will be notified. At the two-month mark, an email will be sent to the submitting AP(s), their alternate contact and the property owner indicating that if a response is not received within two (2) weeks that the Submission will be sent for a Focused Review (“FR”), which has the potential to result in a non-random performance assessment (“NRPA”).

The submitting AP(s) response is sent to the AS who will then forward it to the DS. The DS will review the response and, if necessary, the DS will contact the submitting AP(s) to discuss items that may not have been sufficiently clarified.

If an item(s) requiring clarification identified during a DS is not resolved (generally within two rounds of questions and responses, although this may vary from case to case) and there is the potential for a major technical error or regulatory omission, the Submission and completed DS Spreadsheet, along with a Summary of the Screening Issues prepared by the DS, are forwarded by the DS to the DS Coordinator (DSC). The DSC will review the information, and, as appropriate, references to the regulation, protocols and/or guidance that pertain to the item(s) identified. During a DAS, if major technical errors or regulatory omissions are identified that do not appear to be resolvable within a reasonable timeframe, or if it is unlikely that any response will address the concerns, the DS will refer the Submission to the DSC as soon as possible.

If the DSC agrees that further consideration of an item(s) is warranted, the Summary of the Screening Issues and the DS Spreadsheet will be sent by the DSC to the PA Coordinator who will assign a DM of the PAC to conduct a FR of the Submission. The submitting AP(s) will be provided a copy of the Summary of the Screening Issues and will be informed that their Submission has been forwarded to a DM for a FR.

A FR may also be requested by a BC ENV Statutory Decision Maker (SDM) during their review of a Submission forwarded by CSAP Society to the BC ENV. In this case, the SDM will contact the PA Coordinator and request that a FR be conducted. The submitting AP(s) will be informed that their Submission has been sent for a FR at the request of BC ENV.

During the FR, the DM will review the sections of the technical report(s) relevant to the outstanding items requiring clarification. The review process may involve discussion with the DS, the submitting AP(s) and/or the BC ENV.

7.2 Outcomes of the Focused Review

There are two possible outcomes of the FR:

- a) All outstanding items requiring clarification from the DS are resolved, and the Submission is sent to the BC ENV.
- b) The outstanding items requiring clarification from the DS are not resolved, and a review of the relevant sections of the report(s) indicates the potential for major technical errors or regulatory omissions that could impact the conclusions of the reports. In this case, the DM will provide the PAC the results of their FR; the PAC will review the information and determine if a NRPA is warranted.

Figure 1: Detailed Screening Process

