

OMNIBUS UPDATES

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CSAP Professional Development Workshop
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Ministry of
Environment

Overview

1. Reminder of June 2015 objectives
2. Summer Omnibus activities
 - a) New Initiatives
 - b) Accomplishments
3. Overview of General Stakeholder Comment
4. CSAP Comment /Concerns
5. Immediate Schedule

At June 2015 CSAP PD Workshop we talked about:



Pending Draft [Proposal Papers](#):

1. Omnibus Updating: Overview
2. Schedule 4 - Generic Human Health and Environmental Health soil standards
3. Schedule 5 – Human Health Matrix Soil Standards
4. Schedule 6 – Environmental Health Matrix Soil Standards
5. Schedule 5 – Soil to Groundwater Protective Matrix Soil Standards
6. High Density Residential Soil Standards
7. Schedule 6 – Water Quality Standards
8. Schedule 7 – Soil Standards Triggering Contaminated Soil Relocation Agreements
9. Schedule 9 – Sediment Quality standards
10. Schedule 10 – Generic Human Health soil standards and Generic Drinking Water standards
11. Schedule 11 – Vapour Quality standards

Formats for proposed Schedule X (soil) and Schedule W (water)

OMNIBUS TOPICS — CSAP JUNE 2015 WORKSHOP

Proposal to eliminate Schedule 7 Soil Standards Triggering CSRAs

Possible new “Parkade” and Human Health Wildlands vapour standards



Possible new soil/water standards for some “emerging toxicants”

Discussed technical aspects related to proposed purpose-derived Wildlands soil standards

Need for consequential amendments to:

- Hazardous Waste Regulation and
- Organic Matter Recycling Regulation

Needed changes to various CSR Protocols, Procedures and Guidance documents, and

Presented the schedule/timeline to accomplish the Stage 10 amendment

OMNIBUS SUMMER 2015 – “NEW” INITIATIVES

During the summer the ministry initiated:

- Treaty 1st Nations consultations
- Request for Drafting Lawyer
- Finalizing “TRVs” (with CSAP assistance)
- BCELTA “Methods check” and “Substance DL check”
- Finalizing Draft Proposal Papers as “Final Protocol Papers”
- Calculation of draft standards
- Work on consequential amendments for HWR & OMRR
- Contracting of facilitated final stakeholder consultation



OMNIBUS SUMMER 2015 - ACCOMPLISHMENTS

During the summer the ministry:

- Posted the 11 Draft Proposal Papers for comment
- Provided “one on one” meetings on the proposal papers with key stakeholders, including:

BCBC	BCELTAC	BC MoH	CAPP	CFA
City of Surrey	City of Vancouver	CSAP	DFO	EC
EPD	HC	MARR	OGC	SABCS
UDI				

- Finalized “Response to Comment Received” document
- Finalized “Decided Elements for Stage 10 Amendment” based on response to comments received.

COMMENTS ON OMNIBUS PROPOSAL PAPERS

Comments received:

- 8 week comment period: July 7, 2015 to August 28, 2015
- 300 comments submitted from wide range of stakeholders
- 60+ comments received from CSAP
- Most CSAP comments were technical in nature
- Most CSAP comments focussed on concerns with proposals

THANKS FOR
COMMENTING

COMMENTS – GENERAL SUPPORT

Proposal Papers – Common Endorsed Elements

Unanimous support for:

- ongoing fixed cycle of standards updating
- new High Density Residential land use standards
- new “Parkade” vapour standards

Strong support for:

- new Sch X (soil) and Sch W (water) formats
- New WL modified regression derivation method
- updating the Sch 10 Soil and DW standards
- converting aesthetic-based DW standards to new toxicologically-based DW standards
- eliminating Sch 7 CSRA standards/use all CSR standards to determine need for CSRA
- deferring updating of IW and LW standards to next cycle
- deferring updating of sediment standards to next cycle



COMMENTS – GENERAL CONCERNS

Proposal Papers – Common Concerns

- must have a “grandfathering period” re: Stage 10 implementation
- timeline to complete Stage 10 amendment
- will Analytical methods (for emerging toxicants) be available ?
- will Background and Detection Limit checks be retained ?
- concerns re: Consistency between Health Canada DW tox-based guidelines and proposed new LRS updated tox-based DW standards
- will there be an opportunity to see/review the Emerging Toxicants list ?
- concerns re: hierarchy of TRV sources
- Will there be an opportunity to see/review the TRV list ?
- transparency/documentation of new derived standards
- will there be an opportunity for further consultation on actual calculated standards ?
- will Clinical Adjustment Factors be retained for arsenic, cadmium and lead ?



COMMENTS – GENERAL CONCERNS

Proposal Papers – Common Concerns

- GW model and soil to GW to protect DW standards – too conservative
- ETs for human health standards – too conservative
- concerns for WL standards
 - EC15 level of protection of protection – too conservative
 - Concern with using combined lethal and non-lethal ECx data to set WL standards
 - New WL standards will increase cost of site assessment and remediation
 - No support for Human Health WL vapour standards
 - Need for more clarity re: application of WL vs. Urban Park standards in cities
- scope and timing of Consequential Amendments to HWR and OMRR
- controversy re: possible adoption of CCME PHC analytical methodology, derivation approach and guidelines versus retaining the existing BC PHC analytical methodology, derivation approach and standards
- concern with enforcement of HDR prohibitions (e.g. no playgrounds and 3 story rule)



CSAP COMMENTS – NON-TECHNICAL

CSAP comments which have resulted in changes to proposals include:

General concerns

- Concern for a “Coming into Force” provision
- Concerns related to PHC fractions, analytical methods, possible adoption of CCME guidelines and derivation methods for updating MoE VPH/LEPH/HEPH soil and water standards
- Concerns re: Human Health and Ecological TRVs
- An opportunity to review/comment on draft standards



FORWARD
A NEW WAY

Specific concerns

Concerns for proposed Environmental Health matrix stds:

- WL concerns re: use of NOEC/LOEC data
- combining of lethal and non-lethal data
- refinement of new regression method
- use of CL soil invert/plant standard for HDR
- desire for early access to datasets used in derivations



Concerns for Human Health matrix stds:

- will clinical adjustment factors be used for As, Cd & Pb ?
- Human Health ET for WL – 52, 26 or 13 weeks ?
- use of child receptor - too conservative for CL
- desire for early access to TRVs, bioavailability factors, etc. used in derivations

Specific concerns

Concerns for new GW model and matrix Soil to GW stds:

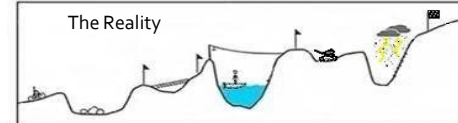
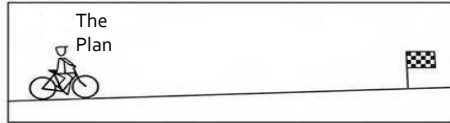
- will result in less stringent stds for substances subject to bio-decay and absorption (e.g. benzene) but more stringent stds for substances with revised Kds and new water quality stds (e.g. metals)
- need for P2 leachate test and new P2 linked parameter suites
- desire for 2005 SABCS recommendations to be fully addressed for Stage 10

Specific concerns

Concerns for water stds:

- inconsistency between Hel Can and MoE tox-based DW stds
- proposed new Hardness AW standard
- need for Sch 10 DW standards to be media apportioned
- proposed antimicrobial and E2 water standards will capture domestic waste water and septic fields
- timing of Hel Can vs. MoE proposed PFOS/POFA water standards

OMNIBUS – IMMEDIATE SCHEDULE



Date	Task to be completed
mid November	Non-1 st Nations “Response to Comment” posted to web
End November	1 st Nations consultations completed
	1 st Nations “Response to Comment” completed
early December	1 st Nations “Response to Comment” posted to web
end December	“Final Protocol Papers” drafted
mid January	“Final Protocol Papers” posted to web
end January	Final facilitated “group stakeholder” consultations

QUESTIONS ?

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