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October 15, 2015

Project: 134072

Shell Canada Products  
PO Box 100, Station M  
400 - 4<sup>th</sup> Avenue SW  
Calgary, AB T2P 2H5

**ATTENTION:** John Driedger, P.Eng.

**REFERENCE:** **Performance Verification Plan, Management Area (City MA) Adjacent to Former Service Station at 490 Carney Street, Prince George, BC  
Location Code: C01181**

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The Environment & Water business unit of SNC-Lavalin Inc. (SNC-Lavalin) has prepared this Performance Verification Plan (PVP) in support of an application for a Certificate of Compliance (CofC) for the Management Area (MA) associated with the adjacent former service station, at 490 Carney Street, Prince George, BC, Location Code: C01181, BC Ministry of Environment (MoE) site ID # 2062 (herein referred to as the "City MA"). The PVP presents the principal risk controls that apply at the City MA to ensure the City MA CofC remains valid (i.e., the key risk controls of Schedule B). The PVP was prepared in accordance with MoE Procedure 12: Procedures for preparing and issuing contaminated sites legal instruments (2013) and Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans (2014).

## **Principal Risk Controls**

A Human Health and Ecological Risk Assessment (HHERA) was conducted for the City MA, and the results presented in the SNC-Lavalin report, *Human Health and Ecological Risk Assessment, Former Shell Service Station and Associated Management Area, 490 Carney Street, Prince George, BC, Location Code: C01181*, prepared by SNC-Lavalin, dated October 14, 2015, (SNC-Lavalin, 2015a). The HHERA was prepared based on the findings and conclusions presented in the SNC-Lavalin report, *Preliminary Site Investigations, Detailed Site Investigation and Decommissioning, Former Shell Service Station and Management Area, 490 Carney Street, Prince George, BC* dated September 15, 2015 (SNC-Lavalin, 2015b).

The principal risk control on which the SNC-Lavalin (2015a) risk assessment was based, as presented in Schedule B of the CofC, is as follows:

- › Groundwater must not be used as a drinking water source at the MA.





## Determination of Procedure 12 Remediation Type

Based on the principal risk control for the MA (i.e., the use of institutional control to mitigate/eliminate risks at the MA and lack of imminent risks in the event that control was either not implanted or were rendered ineffective), the Remediation Type applicable at the MA is considered to be Type 2.

Under a Remediation Type 2 scenario, MoE (2013; 2014) indicates that a PVP is required, while an operations and maintenance plan may be required.

## Performance Verification Plan

A PVP is required to ensure that the principal risk control upon which the HHERA is based is being met at the City MA.

This includes the maintenance of up-to-date records of performance verification actions and results for the MA being maintained by the responsible person (or their agents). If requested by the Director, the responsible person (or their agents) will provide these records to the MoE. As well, if requested by the Director, responsible person(s) will provide a signed statement on whether conditions set out in this Schedule B are being met.

Performance verification actions for the City MA include the following:

- › Communication with the owner/operator that groundwater at the MA must not be used for drinking water purposes. The City MA is located in a developed commercial/residential area and drinking water to the surrounding area is currently supplied by a municipal water distribution system. Consequently, groundwater is not being used for drinking water purposes (e.g., consumption, showering, washing, garden watering). The City MA is currently used as a roadway, future use is anticipated to remain industrial with no buildings present. Given the developed nature of the surrounding area and the presence of an alternate drinking water supply in the area, future use of groundwater at the City MA as a drinking water supply is considered unlikely.
- › Based on the above, an advisory for the MA that groundwater must not be used for drinking water purposes is considered appropriate to meet this risk control. The listing of this risk control in Schedule B of the CofC meets this requirement

In summary, it is our opinion that the advisory in Schedule B of the CofC is sufficient for addressing the principal risk control at the City MA.

## References

MoE. 2013. Procedure 12. Procedures for preparing and issuing contaminated sites legal instruments. BC Ministry of Environment, Victoria, BC, February, 2013.





MoE. 2014. Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans. BC Ministry of Environment, Victoria, BC, February, 2014.

SNC-Lavalin. 2015a. *Human Health and Ecological Risk Assessment, Former Shell Service Station and Associated Management Area, 490 Carney Street, Prince George, Location Code: C01181*, prepared by SNC-Lavalin Inc., Environment & Water, dated October 14, 2015.

SNC-Lavalin. 2015b. *Preliminary Site Investigations, Detailed Site Investigation and Decommissioning, Former Shell Service Station and Management Area, 490 Carney Street, Prince George, BC*, prepared by SNC-Lavalin Inc., Environment & Water, dated September 15, 2015.

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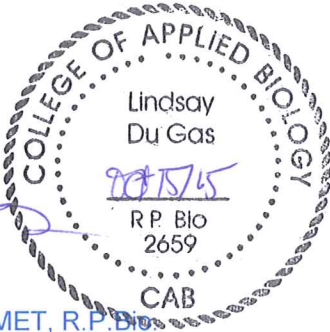

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Prepared by:

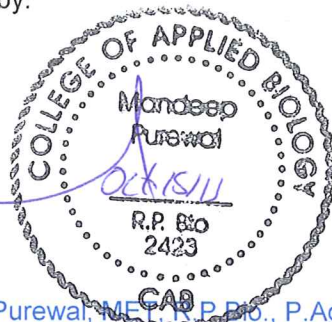



Lindsay Du Gas, MET, R.P. Bio.  
Risk Assessor/Toxicologist

*Environment & Water*  
**Infrastructure**

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enc.

Reviewed by:



Mandeep Purewal, MET, R.P. Bio., P.Ag.  
Project Specialist, Risk Assessment

