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November 6, 2015

Project 132059

Imperial Oil Limited
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ATTENTION: Nicholas McGregor

REFERENCE: **Performance Verification Plan, Management Area associated with former Plaza Esso service station located at 1389 Main Street in Penticton, BC**

On behalf of Imperial Oil, 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 associated with the former Plaza Esso service station located at 1389 Main Street in Penticton, BC, MoE Site ID 10254 (herein referred to as the "MA"). The PVP presents the principal risk controls that apply at the MA to ensure the CofC remains valid (i.e., the key risk controls of Schedule B of the CofC). The PVP was prepared in accordance with BC Ministry of Environment (BC MoE) Procedure 12: Procedures for preparing and issuing contaminated sites legal instruments (BC MoE, 2013) and Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans (BC MoE, 2014).

PRINCIPAL RISK CONTROLS

A Human Health and Ecological Risk Assessment (HHERA) was conducted for the MA, the results are presented in the SNC-Lavalin report, *Human Health and Ecological Risk Assessment, former Plaza Esso service station located at 1389 Main Street in Penticton, BC*, prepared by SNC-Lavalin (SNC-Lavalin, 2015a). The HHERA was prepared based on the findings and conclusions presented in the SNC-Lavalin report, *Preliminary and Detailed Site Investigation, Former Plaza Esso Service Station, 1389 Main Street, Penticton, BC* (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.



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DETERMINATION OF PROCEDURE 12 REMEDIATION TYPE

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

Under a Remediation Type 2 scenario, MoE (2013 and 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 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 Schedule B of the CofC are being met.

Performance verification actions for the MA include the following:

- Communication with the owner/operator that groundwater MA must not be used for drinking water purposes (e.g., consumption, showering, washing, gardening, ect). The MA is located within a commercially developed area of the City of Penticton with a municipal water supply distributing potable water to the MA and surrounding area. It is considered highly unlikely that drinking water wells will be installed at the MA in the future given the developed nature of the area and the presence of an alternative water supply.

Based on the above, an advisory that groundwater at the MA 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 an advisory in the form of the listing of the above risk control on Schedule B of the CofC is sufficient for addressing the principal risk control at the 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 Plaza Esso service station located at 1389 Main Street in Penticton, BC*. Prepared by SNC-Lavalin. 2015.



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SNC-Lavalin. 2015b. *Preliminary and Detailed Site Investigation, Former Plaza Esso Service Station, 1389 Main Street, Penticton, BC.* Prepared by SNC-Lavalin. 2015.

LIMITATION OF LIABILITY, SCOPE OF REPORT AND THIRD PARTY RELIANCE

This report has been prepared and the work referred to in this report has been undertaken by the Environment & Water business unit of SNC-Lavalin Inc. (SNC-Lavalin) for Imperial Oil Limited. It is intended for the sole and exclusive use of Imperial Oil Limited, its affiliated companies and partners and their respective (insurers), agents, employees and advisors (collectively, "Imperial Oil"). Any use, reliance on or decision made by any person other than Imperial Oil based on this report is the sole responsibility of such other person. Imperial Oil and SNC-Lavalin make no representation or warranty to any other person with regard to this report and the work referred to in this report and they accept no duty of care to any other person or any liability or responsibility whatsoever for any losses, expenses, damages, fines, penalties or other harm that may be suffered or incurred by any other person as a result of the use of, reliance on, any decision made or any action taken based on this report or the work referred to in this report.

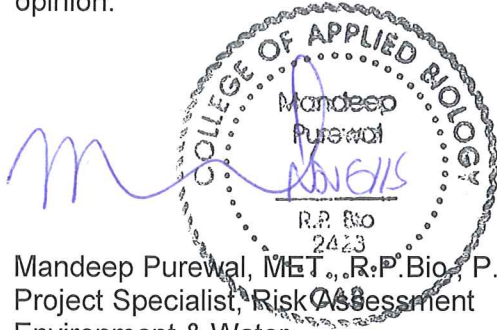
The investigation undertaken by SNC-Lavalin with respect to this report and any conclusions or recommendations made in this report reflect SNC-Lavalin's judgement based on the site conditions observed at the time of the site inspection on the date(s) set out in this report and on information available at the time of preparation of this report. This report has been prepared for specific application to this site and it is based, in part, upon visual observation of the site, subsurface investigation at discrete locations and depths, and specific analysis of specific chemical parameters and materials during a specific time interval, all as described in this report. Unless otherwise stated, the findings cannot be extended to previous or future site conditions, portions of the site which were unavailable for direct investigation, subsurface locations which were not investigated directly, or chemical parameters, materials or analysis which were not addressed. Substances other than those addressed by the investigation described in this report may exist within the site, substances addressed by the investigation may exist in areas of the site not investigated and concentrations of substances addressed which are different than those reported may exist in areas other than the locations from which samples were taken.

If site conditions or applicable standards change or if any additional information becomes available at a future date, modifications to the findings, conclusions and recommendations in this report may be necessary.



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