



January 18, 2016 Project: 131001

Imperial Oil Environmental Services 237 Fourth Avenue, SW, PO Box 2480 Station 'M', Room 25023 Calgary, AB T2P 3M9

ATTENTION: Mr. Nicholas McGregor

REFERENCE: Performance Verification Plan, Management Area associated with

Former Service Station at 8655 Granville Street, Vancouver, BC

On behalf of Imperial Oil (Imperial), 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 adjacent to the former service station, located at 8655 Granville Street, Vancouver, BC (herein referred to as the "MA"). The MA is owned by Mrs. Cynthea Levy. 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). 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, 2014a) and Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans (BC MoE, 2014b).

1 Principal Risk Controls

A Human Health and Ecological Risk Assessment (HHERA) was conducted for the former service station and associated MAs, with the results presented in the SNC-Lavalin report, *Human Health and Ecological Risk Assessment, Former Service Station and Associated Management Areas, 8655 Granville Street, Vancouver, BC*, dated January 18, 2016 (SNC-Lavalin, 2016a). The HHERA was prepared based on the findings and conclusions presented in the SNC-Lavalin report, *Site Investigations and Remediation, Former Service Station, 8655 Granville Street, Vancouver, BC* dated January 14, 2016 (SNC-Lavalin, 2016b).

THIS REPORT CONTIANS PROVISIONS LIMITING LIABILITY, THE SCOPE OF THE REPORT AND THIRD PARTY RELIANCE

These documents and the information contained therein are confidential, property of Imperial Oil Limited and any disclosure of same is governed by the provisions of each of the applicable provincial or territorial freedom of information legislation, the *Privacy Act (Canada)* 1980-81-83, c. 111, Sch. II "1", and the *Access to Information Act (Canada)* 1980-81-82-83, c.111, Sch. I "1", as such legislation may be amended from time to time.





Imperial Oil Environmental Services – Page 2 of 4 January 18, 2016

Project 131001

The principal risk control applicable to this MA, on which the SNC-Lavalin (2016a) risk assessment was based, as presented in Schedule B of the CofC, is as follows:

The current building at the MA will remain in place, and no additional buildings will be constructed at the MA in the future.

2 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 was either not implemented or was rendered ineffective), the Remediation Type applicable at the MA is considered to be Type 2.

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

3 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. Performance verification actions for the MA include the following:

- Communication with the owner/operator that the current building must remain in place and that no additional buildings are to be constructed at the MA in the future. This requirement was previously communicated to the owner of the MA in a letter from SNC-Lavalin, on behalf of Imperial, dated November 23, 2015 (SNC-Lavalin, 2015). The owner has not expressed concerns regarding this requirement, nor do they have immediate plans to sell or redevelop the MA. Communication between Imperial and the owner will continue if the owner expresses an interest in the sale and/or redevelopment of the MA in the future.
- Based on the above, an advisory that the current building must remain in place and that no additional buildings can be constructed at the MA in the future is considered appropriate to meet this risk control. The listing of this risk control in Schedule B of the CofC meets this requirement.

No associated inspection, monitoring/maintenance or other performance verification actions are required for the above conditions.

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 MA.





Imperial Oil Environmental Services – Page 3 of 4 January 18, 2016

Project 131001

4 References

- BC MoE. 2014a. Procedure 12. Procedures for preparing and issuing contaminated sites legal instruments. BC Ministry of Environment, Victoria, BC, February, 2014.
- BC MoE. 2014b. Administrative Guidance 14: Performance Verification Plans, Contingency Plans and Operations and Maintenance Plans. BC Ministry of Environment, Victoria, BC, February, 2014.
- SNC-Lavalin. 2015. Application for Certificate of Compliance for 8675 Granville Street (Your Property), Adjacent to Former Service Station Property at 8655 Granville Street, Vancouver, BC. Dated November 23, 2015.
- SNC-Lavalin. 2016a. Human Health and Ecological Risk Assessment, Former Service Station and Associated Management Areas, 8655 Granville Street, Vancouver, BC. Prepared by SNC-Lavalin. Dated January 18, 2016.
- SNC-Lavalin. 2016b. Site Investigations and Remediation, Former Service Station, 8655 Granville Street, Vancouver, BC. Prepared by SNC-Lavalin. Dated January 14, 2016.

5 Limitation of Liability, Scope of Report and Third Party Reliance

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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.





Imperial Oil Environmental Services – Page 4 of 4 January 18, 2016

Project 131001

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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