

MEMBERS UPDATE – Summer 2019

Message from the President

It is with great pride that I begin my term as President of the CSAP society. The organization has established a strong reputation across British Columbia by ensuring the integrity, objectivity and expertise of the members it serves. CSAP has a long history of consistently supporting and protecting the public's interest by cooperating and consulting with professional and scientific bodies, stakeholders, local and provincial governments.

I want to share my goal with you to build on this legacy by embracing and implementing new ideas and feedback. I am proud to lead the society's board over the months ahead and look forward to embracing new plans aimed at growing CSAP's brand. We're getting things started with a face to face meeting this month with the Ministry of Environment to discuss our mutual objectives and identify areas for improvement.

CSAP's proven track record of minimizing environmental risks and protecting the health and safety of future generations sets the stage for further success over the year ahead. Our staff consists of a small but mighty pool of talented and knowledgeable individuals who oversee the invaluable efforts of committee members, CSAP members and our partners and stakeholders.

I would like to thank the committee members who are stepping down from their roles with us and to welcome the 16 new members who came on board this summer:

Patricia Carmichael, Board of Directors, Membership Committee Chair
Travis Deeter, Professional Development Sub-Committee
Dawn Flotten, Membership Committee
Gary Hamilton, Performance Assessment Committee
Heidi Horlacher, Board of Directors
Jim Laidlaw, Professional Development Sub-Committee
Duncan Macdonald, Board of Directors, Governance Committee Chair
Trish Miller, Discipline Committee Chair
Simone Mol, Technical Review Committee
Cindy Ott, Professional Development Sub-Committee
Peter Reid, Governance Committee
Erin Robson, Professional Development Sub-Committee
Scott Steer, Performance Assessment Committee
Michelle Uyeda, Membership Committee
Audrey Wagenaar, Membership Committee
Reidar Zapf-Gilje, Discipline Committee

I am truly inspired by the dedication of all our committee members and the CSAP members whose expertise plays a key role in keeping British Columbia's land and waterways safe and clean. It is imperative we keep this momentum growing to advance the important work CSAP does.

Your communication is fundamental to this development and I encourage you to connect with me anytime. I look forward to working together and we'll see you at the fall workshop!

Tony Gillett, P.Eng.

Ministry Updates/ Clarifications:

A summary of previous Ministry Clarifications is available [here](#).

Performance Assessment Committee Updates

- A recent performance assessment highlighted one of the key elements in the conceptual site model (CSM) underlying Technical Guidance 4: Vapour Investigation and Remediation (TG4). It is important to note that vapour investigation at the foundation elevation represents the worst-case location, even for a deep parkade structure with a shallow vapour source. The submitting AP's rationale was supported as follows:
- In this scenario, the Site is a newly constructed high rise, with 20m of underground parkade structure. The source of vapour is an ongoing offsite source, near surface. The pre-construction vapour contamination identified onsite was near surface. The vapour remediation investigation location was at the bottom of the parkade.
- The performance assessment panel, along with most members of the PAC committee, found this rationale surprising because of the difference in elevation. Specifically, why wouldn't the ambient air in the first level of parkade represent the worst-case location for potential vapour intrusion?

The key points of the CSM in in this example are as follows (and they are also referenced and linked in TG4):

- The primary process for soil vapour entering buildings is typically soil gas advection (SABCS, 2006);
- Most of the soil gas flow occurs within 1 to 2m of the foundation (SABCS, 2006); and
- Intact concrete is virtually impermeable to air flow (USEPA, 2012).

References:

- Science Advisory Board for Contaminated Sites in British Columbia (SABCS), Guidance on Site Characterization for Evaluation of Soil Vapour Intrusion into Buildings. February 2006.
- Office of Solid Waste and Emergency Response U.S. Environmental Protection Agency (USEPA), Conceptual Model Scenarios for the Vapor Intrusion Pathway. February 2012.
- For resubmission of a legal instrument application that was concluded to be deficient under a performance assessment (PA), the document package is expected to be standalone. Therefore, all relevant technical reports and supporting documents from the original submission and revised or additional documents prepared to address information requests from the PA, are to be included. Please ensure that the documents and forms for a resubmission application are complete. Omissions will result in a delay in processing.
- As stated in the Performance Assessment Guidelines, where Stage 1 review findings for a PA indicate that "Additional Information is Required": The AP has two months from the date they receive the Stage 1 Review Findings to submit the required information in an Addendum to the

submission. If more time is required, an extension outlining reasons for the delay may be requested from the PA coordinator. To avoid long PA processing times, no more than three extensions will be accepted (up to 6 months).

- A recent PA which included a P21 drinking water release obtained for chloride in groundwater identified a requirement for background approvals for the parameter of concern (chloride in this case) for all media (e.g. under Protocol 4 and Protocol 9). ENV clarified that the P21 release cannot be relied on to dismiss chloride in soil as background. Aquatic life water use was also considered for the chloride concentrations.

Detailed & Administrative Screening Update

- A recent detailed screening for a submission in which a Protocol 2 Site-Specific Numerical Soil Standards (SSS) was derived as noted on Schedule C of the instrument provided a lesson learned regarding documentation on the use of this approach in the Summary of Site Condition (SoSC). Section 4.4. of the SoSC 'Applicable Numerical Concentration Standards and Criteria' indicates that 'If Other is specified above, please explain: (applicable or excluded guidance, protocols or policies specific to the site)'. Therefore, if the submission documents include a Protocol 2 derived SSS, then the "Other" box should be checked and appropriate comment provided, including the substance(s) for which SSS's were derived. Also, if substances were remediated to a P2 derived SSS the information should be included in Section 5.3 of the SoSC in the Background column which includes P4 and P9. Please note that if the P2 derivation required a Director's Decision that this ENV document must be listed in SoSC Part 3: Document Summary and Schedule D of the legal instrument.
- CSAP was requested by Land Remediation to undertake a Detailed Administrative Screening (DAS) of CSAP submissions. The DAS started on January 1st, 2015. Its primary objective is to:

"Ensure that the sufficient documentation has been supplied with the CSAP Submission to meet the requirements of Procedure 12".

Since the implementation of the DAS process, many of you have indicated that the review process has been beneficial to your practice. It has become an integral part of the process for the submission for regulatory instruments and we have received positive feedback from the statutory decision makers (SDMs) at ENV.

- Please remember to mark your calendar for our upcoming webinar on the DAS on October 3rd, 2019 from 10–11 am. We will be reviewing the Preliminary and Detailed Screening Process, the screening tools, and the Annotated SoSC and discussing the feedback received from both ENV and submitting APs. – WEBINAR POSTPONE

We will also cover the lessons learned from the screening process and will review some statistics gathered from the screening spreadsheets to identify common problems associated with submissions.

Technical Review Updates:

The Technical Review Committee (TRC) thanks retiring TRC members Guy Patrick and Ian Mitchell, and welcomes our incoming new member, Simone Mol. In recent months, the TRC has been focusing on delivery of projects. The PFAS deliverable has been published on the CSAP website and an update to CSAP's vapour guidance is underway. Given the downturn in submissions, the budget for the TRC for this fiscal year is lower than usual. For this reason, the TRC's project commitments for 2019/20 are still in progress. Thank you to everyone who submitted their suggestions to the TRC for future project ideas – there were lots of good insights. We are reviewing them and working on identifying priorities.

Membership Updates:

The Membership Guidelines were updated in April 2019 and can be found here: <https://csapsociety.bc.ca/wp-content/uploads/CSAP-Membership-Guidelines.pdf>

Updates primarily include clarification for:

- New applicants regarding the application process and the necessary documentation outlining experience; and
- Experienced reviewers regarding the minimal level of competence that must be demonstrated by applicants for approval to write examinations.

It is also now mandatory to submit your required 150 PD hours through the online submission manager using the CPD tracking tool. This must be completed at the time of your annual membership renewal and no later than December 31st.

For those whose membership renewal is due December 31, 2019, please note that at least one AP submission is required before that date if you have not submitted in the last three years. In addition to the required 150 PD hours, evidence that you remain a member in good standing with your parent organization must also be submitted. Refer to Appendices 9 and 10 of the CSAP Membership Guidelines for specific details on membership renewal and CPD hour requirements.

2019 examinations are scheduled for November 5th, 6th and 7th. The Experience Review process is currently underway and scheduled to be completed by August 31st. The total number applicants writing the exam this year are:

Total Candidates: 13 (3 Past candidates and 10 New Applicants)

Numerical Exam: 8

Regulatory Exam: 10

Risk Exam: 4 (Numerical AP: 1)

Please note the deadline for applications to write the Regulatory Exam for those members who were unable to complete a CSAP submission as part of their renewal requirements is August 31st, 2019.

The CSAP Society currently comprises 116 members; 17 Risk APs; 93 Numerical APs; and 6 Risk/Numerical APs.

Professional Development Updates:

Webinars:

Have you checked out a CSAP webinar lately? Simply visit csapsociety.bc.ca to review the following recordings:

- P22 and TG4 Soil Vapour
- Preparing a CSAP Submission
- Omnibus Standards Review: Real Data-Real Results
- SLRA and Groundwater Models
- PA and Detailed Screening – Lessons Learned
- Detailed Administrative Screening
- TG4 and Trench Worker Attenuation Factors

New webinars are currently in the works, including topics such as:

- CLAUSE 1 AND 2 – Regulatory Instruments
- Risk Conditions
- PVPs
- CoCs
- AG11

If you have an idea for a CSAP webinar, please share it with us by sending an email to: communications@csapsociety.bc.ca

CSAP Event Calendar:

Don't miss the **CSAP Fall Professional Development Workshop!**

Date: Friday October 25th, 2019

Check-in: 8:30am

Time: 9am to 4:00pm

Venue: The Vancouver Trade and Convention Centre, 1055 Canada Place, Meeting Room Level 2, West Meeting Rooms 211 – 214, Vancouver, B.C.

Registration closed

We'll begin this session with technical presentations from your Technical Review Committee and ENV,

and then we'll move to discussing topics that impact the future of the industry.

This year's theme: "Sustainability in Contaminated Sites Management"

The current state of investigation and remediation in BC will be explored, followed by venturing 'outside the box' to see where we are at and where we need to be going.

A special guest is also joining us to share key insights from the Netherlands!

This presentation will cover both the history of Dutch policies and the current approach the Dutch use to address contaminated sites.

Upcoming changes to law and regulations on soil and groundwater contamination and remediation include a new 'Environment Law' in the Netherlands. This law states that new paradigms are now required to remediate, in addition to simply the presence of contamination by itself.

INDUSTRY Events

9th Annual SABCS Conference and Workshop on Contaminated Sites

September 26, 2019

7:45am – 4:30pm

2019 Segal Building

500 Granville Street Rooms 1200 – 1500 (all sessions) and 2300 (parallel session only)

[SABCS Conference Registration now open](#)

- Conference Program now available
- Technical Presentations and Regulatory Updates

[Conference Program](#)

[Workshop Program](#) now available

Adapting Contaminated Sites Management to a Changing Climate

Speakers from across Canada and the United States

September 25, 2019

7:45am – 4:30pm

SFU Harbour Centre Earl and Jennie Lohn Policy Room

515 West Hastings Street

Vancouver, BC

In The News:

- [National Post article](#)