

CSAP Member Update Winter 2020

Message from the President

CSAP has had a busy and productive few months since the last update, key details of which you can read below. In particular, I want to draw attention to two important goals the Board set for ourselves at the Strategic Planning Workshop in January 2020. This annual workshop aims to identify and act on big-picture issues that affect how CSAP functions and how APs practice. First, with the Province's developing focus on changes to the professional reliance model in BC, the Board sees a need to evaluate CSAP's relationship with the Ministry and how we can effectively collaborate on issues of shared interest. Second, in the flurry of activity around CSR Amendments 10 through 12 in recent years, our focus has been on providing strong support to the Ministry and on effectively communicating information to our members. This has necessarily pulled attention from our engagement with stakeholders such as industry groups and local government. Therefore, we committed to redouble our engagement efforts to obtain input and perspective from our stakeholders and to make use of their knowledge to understand trends that may affect our practice in the future. The board has struck two task forces to advance these goals. Both task forces will report directly to the Board in the coming months and we look forward to reporting on progress toward these two objectives in future updates.

Tony Gillett, P.Eng.

Ministry Updates/Clarifications

To clarify the application process. The Ministry has listed the following steps:

1. Complete and sign the [Contaminated Sites Services Application form](#) (CSSAF) (mandatory with every application);
2. Forward an electronic copy of all reports and applicable forms (CSSAF, [SRCR/Questionnaire](#)), [SoSC](#), and [Protocol 6 Approval](#) (where applicable) to the Client Information Officer address csp_cio@Victoria1.gov.bc.ca;
3. Mail one paper copy of all documents to the Client Information Officer. Reports and copies of aged reports should only be sent in an electronic format.
4. Please remit the applicable fees (outlined in [CSR Schedule 3](#), Table 2) with the documents. GST should be applied to fees, unless the applicant qualifies for an exemption.

Can a Standards AP sign off on a submission where the PAAD has been used?

In the case of the PAAD, ENV has indicated that in cases where no other media or contamination requires Detailed Risk Assessment and application of the PAAD will result in vapours meeting numerical standards, a Standards AP can sign off on the use of the PAAD in a risk-based (screening level) instrument. If contamination is identified in another medium and requires Detailed Risk Assessment, the use of the PAAD cannot be signed off by a Standards AP.

For background, vapour contamination that exceeds numerical standards in the DSI is to be addressed via Detailed Risk Assessment. However, the application of the PAAD after completion of the DSI may be used in circumstances where no other media moves to DRA and this is the only risk mitigation measure needed to address vapour contamination. P22 indicates that the PAAD can only be used in a risk-based submission, and while it is considered somewhat of a grey-area, ENV has said that they consider the use of the PAAD to be "SLRA-like". Hopefully the ministry can fix this grey area in a future protocol update.

Guidance for listing of substances on a Certificates of Compliance:

Rather than listing substances in Certificates of Compliance which meet either Site Specific Standards and/or Background Concentrations as “remediated” Submitting AP’s will be directed to review the Reports, SoSC and Instruments to determine the appropriate Schedule C listing of substances as per the examples below. These examples apply to both groundwater and soil contamination in which background concentrations are used to substitute for the CSR numerical standards.

- Example A (No physical remediation conducted)
In this example you have a site where you have a background level/SSS of 15 ug/g for arsenic in soils and you are getting a CoC. Your site exceeds the arsenic numerical standard, but Protocol 4 or 9 permits the use of regional concentrations, so your site is not contaminated for arsenic. You do not undertake remediation as all the soils at the site meet the background/SSS level. Schedule C would list the following.
Substances evaluated in soil for Commercial soil use:
To meet local background concentrations/ To meet site-specific numerical standards:
 - Arsenic CAS #
- Example B (Physical remediation conducted)
The example would be you have a site where you have a local or regional background level/SSS of 15 ug/g for arsenic in soils and you are getting a CoC. You have a small pocket where the arsenic was 20 ug/g, which you excavated, and the confirmatory samples were below 15 ug/g. In this case you would enter the language as below in Schedule C indicating the site was “remediated” to a background level or SSS for arsenic in soils
Substances remediated in soil for Commercial soil use:
To meet local background concentrations/ To meet site-specific numerical standards:
 - Arsenic CAS #

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

Performance Assessment Committee Updates

BC ENV updated the SoSC (version 2.3) and posted a new fillable PDF. You can find CSAP’s fillable version [here](#).

Please note that the ministry form does not include the P21 checklist for water use evaluation included in the CSAP SoSC. This checklist is not mandatory for inclusion with the SoSC, but does provide a thorough list of required information for water use determinations.

Reminder that completion of the CSAP Submission Transmittal Letter is mandatory and a hard copy must be provided with each submission for a legal instrument. Please note that dates and signatures for submission documents revised during the detailed screening process or performance assessment must be current. This includes the SoSC and draft legal instrument.

BC ENV has provided clarification for a comment on a P21 related Q&A presented at the Fall PD Workshop. The question and BC ENV clarification follow.

Q. If your site lies within an area of a mapped aquifer, but one can demonstrate it is not actually an aquifer (i.e. hydraulic characteristics or water quality), is a Water Use Determination (WUD) required from BC ENV?

- a. Yes
- b. No

A. b) As long as it can be shown to meet Protocol 21 requirements, then no formal WUD is needed from BC ENV.

Annette Mortensen, Senior Contaminated Sites Officer provided the following clarification:

Thank you for the opportunity to clarify the P21 question. While I agree that “no formal WUD is needed as long as it can be shown that the site meets the Protocol 21 requirements”, the Q&A gave the impression that a mapped aquifer can be exempt from DW use by showing it does not have the required hydraulic characteristics. This exemption option is not available in P21, thus a WUD would be required if making this argument (see further details below). However, there is an exemption option in P21 for mapped aquifers with poor natural water quality and if the site fulfills this requirement there is no need for a WUD from ENV. The CSAP question, in its current form, includes both hydraulic characteristics and water quality and cannot be answered by a yes/no answer. To avoid confusion, I suggest rewording the question to include poor natural water quality only.

P21 specifies that current drinking water use applies to all mapped aquifers. For unconsolidated aquifers, this is described in Figure 1 and for bedrock aquifers additional text is included in Section 6.0 and Figure 4. In general, mapped unconsolidated aquifers fulfill the hydraulic yield requirements for a viable aquifer. The only site I have ever seen where this was not the case, was where the aquifer boundaries were not correctly mapped on IMap. Here a WUD application can be made to ENV showing that the mapped aquifer is not present on the site using site-specific data. For bedrock units, it is fairly common to measure yield in the shallow part of the aquifer that does not fulfill the requirements for a viable aquifer, however, the aquifer is mapped based on higher yielding fractures deeper in the bedrock. Thus, future drinking water use applies regardless of site-specific hydraulic data showing that the shallow part of the bedrock is not a viable aquifer. If a WUD application was made based on site-specific bedrock data alone, it would not be approved by ENV. The only option for a DW exemption would be a WUD showing that the shallow bedrock acts as a natural confining barrier (NCB) protecting the deeper more productive part of the bedrock (note, no WUD application has yet been approved showing the bedrock acts as a NCB).

Sites with poor natural water quality are exempt from future drinking water use if they fulfill one of the following requirements:

- TDS > 4000
 - site located within infilled marine/estuarine foreshore; or
 - sodium/chloride above DW standards for sites within 500 m of a marine/estuarine foreshore.
- This applies to mapped aquifers as well and no WUD is required from ENV if the P21 requirements are fulfilled (note, this is described clearly in the text and the Figure 1 flowchart, however the bedrock flowchart could be updated to make this exemption clearer for mapped bedrock aquifers).

This advice is consistent with how Protocol 21 is written and how ENV has made WUD decisions since the release of Protocol 21. If CSAP find that the typical interpretation of P21 differs from the above advice, please let us know so it can be corrected.

Detailed & Administrative Screening Update **Screening Notes**

- **Lessons learned**

To avoid lengthy discussions and back and forth between the preliminary screener (PS), detailed screener (DS) and submitting AP, SoSC forms for submissions with multiple instruments, such as for a source site and one or more affected parcels should be prepared in such a way that the readers (PS, DS and ENV) can understand the correlation between all sites from the SoSCs and instruments. This means that all SoSC forms should relate to each other and that the full story should be apparent in all related SoSC forms. This includes, but is not limited to, a clear identification of the source site, the affected site(s), which site is affected by which contaminants, delineation issues, which COC was remediated to which standard, using numerical or risk based standards, etc.

Explanations can be provided in SoSC Sections 2, 4.1, 4.8, and 5.6.

- **Use of CSAP PCOC Screening Document**

The CSAP PCOC screening document titled Potential Contaminants of Concern at Selected Commercial and Industrial Land Uses, June 2018, is intended as a guidance tool and not considered exhaustive, nor is it considered prescriptive. As stated in the PCOC screening document *"The PCOC lists in this document are not exhaustive, nor are they intended to be prescriptive. These lists are based on literature review, input from CSAP membership, and our own experience and are intended as a guide only. This document includes the opinions and suggestions of the authors and does not necessarily reflect the opinions and recommendation of CSAP or the Ministry of Environment and Climate Change Strategy."*

It is noted that the PCOC screening document considers differentiating between primary and secondary contaminants for PCOC selection and provides an example for gasoline contamination. Please be aware that ENV has not provided guidance on the assessment of CSR regulated substances as primary and secondary contaminants in fuels or other contamination sources. Therefore, if the selected approach for PCOC selection includes differentiation between what the practitioner considers primary and secondary constituents of a potential contaminant source, the decision to eliminate regulated substances will require a site, media and contaminant specific rationale to discount regulated substances and the approach may not be acceptable to CSAP and ENV. A thorough investigation of contaminant specific PCOCs is the preferred approach.

Technical Review Committee Updates:

Over the past quarter, the Technical Review Committee has been focused on wrapping up projects started in previous years (all of which have been presented at CSAP meetings) and looking ahead to potential future efforts by the TRC. Thank you to those of you that have sent suggestions for R&D and Technical Reviews. At the start of CSAP's next fiscal year, you can anticipate seeing Requests for Proposals for prioritized work. To learn more about what the TRC does and how – see the [TRC's guidelines](#).

Many TRC projects have deliverables that are posted on-line for easy access – this is where they are located on the CSAP website: <https://csapsociety.bc.ca/members/professional-development/technical-studies/>

Membership Updates:

- 1) **Salute to retiring CSAP member Robin Jones**

Robin Jones has been a Numerical AP since May 2003, and stepped down as a CSAP member in December 2019.

He was an active member of CSAP:

- Board of Directors from 2013 to 2017
- Membership Committee from 2013 to 2014
- PD Sub-Committee from 2014 to 2015
- Discipline Committee from 2014 to 2015
- Executive Committee from 2014 to 2017
- Governance Committee from 2017 to 2019

CSAP thanks Robin for his dedicated work on the various CSAP committees he participated on and wishes him the best in his future endeavours.

2) **Congratulations to the new CSAP Members**

The following individuals have successfully completed the CSAP exam process and have been appointed to the Roster of Approved

Professionals by ENV:

Numerical:

Darlene Atkinson, Lindsay Beaton, Paul Gardner, Brent Olson

Risk:

Albert Loveridge

3) **Request for Examination Development Volunteers**

The Membership Committee invites interested AP's to put their name forward to volunteer as part of the examination process.

The exam development panel will be selected based on experience and a range of locations and company affiliations.

Exam Developer: The time commitment is as follows:

- New volunteers 2-hours webinar on March 20th.
[2 billable hour]
Experienced volunteers 1-hour webinar on March 20th.
[1 billable hour]
- Write 2 exam questions by Friday April 10th, write 3 exam question by Monday June 15.
This is a firm deadline; no extensions will be made.
[10 billable hours]
- Attend a 2-hour writing workshop on Tue April 21st (Numerical); Wed April 22nd (Regulatory), and; Thu April 23rd (Risk).
[2 billable hours]
- Peer review of questions
- Attend a 1.5-day exam development workshop on September: 15 & 16 (Numerical); 17 & 18 (Regulatory), and; 21 & 22 (Risk)
[12 billable hours]

4) **Request for Experience Reviewers**

The Membership Committee invites interested AP's to put their name forward to review new candidate's' work experience and provide a recommendation.

We encourage past and present Exam Developers volunteers to be Experience Reviewers too.

Experience Reviewer: The time commitment is as follows:

- Attend 1-hour intro webinar on June 5th
[1 billable hour]
- Experience Reviewers are paired to review each candidate's experience presentation
[maximum 4 billable hours per review]
- CSAP encourages the reviewers to request further information to the candidates if necessary, and to interview them in case they still have doubts and the documents do not suffice for the application resolution
[billable time dependent on case-by-case basis]
- Provide experience review results
Due date July 17th

Please indicate which category of Experience Reviewer (Numerical, Regulatory, Risk) you are interested in by emailing back to npomareda@csapsociety.bc.ca.

5) **To remain a member in good-standing**

- Enter mandatory professional development hours through the submission manager by Dec 31st every year. There are two ways to enter PD hours:
 - a. [By type](#)
 - b. [By event](#)

Great job everyone for entering their PD hours for 2019! The on-line manager is continually being updated to make this process easier. We are working on it!

- Pay annual CSAP Membership fees (invoices will be issued in April , deadline for payment is June 9th- late fee will be charged after that day);
- Provide proof of and maintain liability insurance (when insurance expires);
- Provide proof of good standing with parent professional organization; **AND**
- If your membership is up for renewal, submit one recommendation for a legal instrument through CSAP must have been submitted over the last three-year period.

An AP will not be allowed to practice as an AP unless ALL of these requirements are met.

6) **Changes on Membership Guidelines**

The Membership Guidelines have been updated in the past year and are almost complete (for the time being). The latest version will be released in the next couple of months. Briefly, the main topics undergoing revision are:

- Eligibility Criteria – better clarity on:
 - relevant and direct documented experience for new applicants (RDE vs DDE)
 - RDE and DDE with respect to Risk-based Standards Approved Professionals
 - References (i.e., supervisors)
- Experience Review Process
 - Addition of qualifications, guidelines and forms
- Project Examples added for Numerical and Risk-based Standards applications – forms revised
- Members in good standing and fines/consequences for not meeting the requirements in main body and Appendix 11
- Clarity and simplification of CPD Categories – addition of Categories 3a and 3b.
- Appendix 9 – Presentation of CPD hours – removal of forms for submitting to CSAP. On-line submission is now mandatory

Professional Development Updates:

1) Webinars

Mark your calendars for our live webinar on:

Detailed Screening – Take 2 on April 21!

To learn more about what the detailed screeners look for, what are the most common mistakes they encounter, and how to avoid them, please check it out.

And if you miss the webinar, no problem! Simply go to our website and view the recording, as well as these other great topics! <https://csapsociety.bc.ca/members/pd-webinars/>

- 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

And YES, we are working on new webinars on topics such as:

- The new CSAP Submissions Manager
- CLAUSE 1 AND 2 - Regulatory Instruments, Risk Conditions, PVPs, CoCs, AG11

If you have an idea for a webinar, please send it along to CSAP!

2) Annual General Meeting

Mark your calendars for CSAP's Annual General Meeting to be held in Vancouver on Tuesday June 16, 2020. This promises to be another good one, and will include presentations on on-going CSAP initiatives and ministry updates.

Register [here](#).

3) Events, Conferences, Training

Stay tuned! CSAP will be sending monthly notices of learning and networking opportunities that may be of interest to you!

4) Reach Out!

Got a technical or "gray area" issue that you've run in to for a site you are working on? Need some advice, guidance or feedback? Why not reach out to other APs, or ask CSAP and we'll see if we can find someone to help? Many APs are more than willing to share their experience on similar issues, and that may be just what you need to move forward.

INDUSTRY Events

List of Potential Professional Development Opportunities

Geoenviropro Talks

Weekly, every Wednesday at 10:00am – free

Sign up to be notified [here](#).

EGBC Website

Browse [here](#) for a list of PD offerings, such as webinars, events, seminar recordings, etc.

Salish Sea Ecosystems Conference

Date: April 19-22, 2020

Location: Vancouver Convention Centre Vancouver, BC

PNW-SETAC is organizing a session for the conference: The Environmental Toxicology and Chemistry of the Salish Sea Ecosystem.

Register [here](#).

29th Pacific Northwest SETAC Annual Conference

Date: February 27-29, 2020

Location: Kitsap Conference Center, Bremerton, WA

Every year, PNW SETAC holds a three-day conference in spring or early summer. Locations vary throughout the region, but are usually in Washington or Oregon, and occasionally in Idaho or British Columbia, Canada. Conferences typically include a special session, workshop, and/or short course on the first day, followed by a full day of sessions on the second day and a half-day of sessions on the third.

Register [here](#).

If you have knowledge of technical events that may be of interest to members, please send the event title and date to [Travis Deeter](#) who is tracking PD events for the membership.

Links of interest

[Greentech Media](#) *World's Second-Largest Ferry Operator Switching From Diesel to Batteries*

[NNSL Media](#) *City updates council on Giant Mine participation*

[HazMat Management](#) *Excess Soil Management Guideline in Ontario – White Paper*

[CTV News](#) *BC Budget 2020 Speech*