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May 6, 2016
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Edgar Development Corp
413-375 Water Street
Vancouver, BC V6B 5C6

Attn: Robert Horvath, Development Manager

Dear Mr. Horvath,

Re: Performance Verification Plan for Certificate of Compliance at 333 E. 11th Avenue, Vancouver, BC

Hemmera Envirochem Inc. (Hemmera) has prepared this Performance Verification Plan (PVP) in support of an application for a Certificate of Compliance (CoC) for the property located at 333 E. 11th Avenue, Vancouver, BC (the "Site"). The PVP presents the principle risk management measures that apply at the Site, so that risk-based standards are and continue to be met. It also lays out the actions that must be taken so that these risk controls are implemented and maintained. This PVP was prepared in accordance with BC Ministry of Environment (MoE) *Procedure 12: Procedures for Preparing and Issuing Contaminated Site Legal Instruments*, effective February 1, 2016 (P12) and BC MOE Administrative Guidance on Contaminated Sites #14: *Performance Verification Plans, Contingency Plans, and Operations and Maintenance Plans, Version 3.0*, dated December 2015 (TG14).

This Work was performed in accordance with the Professional Services Agreement (PSA) between Hemmera Envirochem Inc. ("Hemmera") and EDC, dated March 6, 2015 ("Contract"). This Report has been prepared by Hemmera, based on fieldwork conducted by Hemmera, for sole benefit and use by EDC and the Ministry of Environment (MoE). In performing this Work, Hemmera has relied in good faith on information provided by others, and has assumed that the information provided by those individuals is both complete and accurate. This Work was performed to current industry standard practice for similar environmental work, within the relevant jurisdiction and same locale. The findings presented herein should be considered within the context of the scope of work and project terms of reference; further, the findings are time sensitive and are considered valid only at the time the Report was produced. The conclusions and recommendations contained in this Report are based upon the applicable guidelines, regulations, and legislation existing at the time the Report was produced; any changes in the regulatory regime may alter the conclusions and/or recommendations.

1.0 RISK CONTROL TYPE

Based on the risk management measures for the Site (i.e., the use of institutional controls to mitigate/eliminate risks at the Site and lack of imminent risks in the event that controls were either not implemented or were implemented but were rendered ineffective), a **Type 2** risk control is applicable for the Site. Under a **Type 2** scenario, the BC MOE (2016a; 2015b) indicates that a PVP is required.

2.0 PERFORMANCE VERIFICATION PLAN

This PVP was developed based on the Screening Level Risk Assessment (SLRA) completed for the Site by Hemmera in May 2016 and the Stage 1 and 2 Preliminary Site Investigation, Detailed Site Investigation, and Confirmation of Remediation also report completed by Hemmera in May 2016.

2.1 REQUIRED RISK CONTROLS

Groundwater at the Site must not be used for domestic purposes (i.e. drinking water).

2.2 REQUIRED ACTIONS TO IMPLEMENT THE RISK CONTROLS

The listing of this risk control in Schedule B of the CoC is considered adequate to ensure that groundwater at the Site will not be used for drinking water.

2.3 SUMMARY OF RATIONALE FOR SELECTING REQUIRED PVP ELEMENTS

Benzene and ethylbenzene remain in groundwater at concentrations greater than the *BC Contaminated Sites Regulation* (CSR) Schedule 6 drinking water (DW) standards. While the SLRA concluded that drinking water wells are unlikely to be installed given that the future on-Site building will be connected to the municipal water system, it is necessary to ensure that this requirement is met. Communication of this condition to future users/owners via the CoC is considered to be a suitable risk measure.

3.0 CLOSURE

We trust that this report is satisfactory to your requirements. Please feel free to contact the undersigned regarding any questions or further information that you may require.

Report prepared by:
Hemmera Envirochem Inc.

Report peer reviewed by:
Hemmera Envirochem Inc.

**ORIGINAL SIGNED
AND STAMPED**



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4.0 REFERENCES

BC Ministry of Environment (BC MOE) Procedure 12: Procedures for Preparing and Issuing Contaminated Site Legal Instruments dated December 15, 2015. Effective February 1, 2016.

BC MOE Administrative Guidance on Contaminated Sites: Performance Verification Plans, Contingency Plans, and Operations and Maintenance Plans, Version 3.0 dated December 2015.

Screening Level Risk Assessment, 333 West 11th Avenue, Vancouver, BC, completed by Hemmera, dated May 2016.

Stage 1 and 2 Preliminary Site Investigation, Detailed Site Investigation, and Confirmation of Remediation 333 West 11th Avenue, Vancouver, BC, completed by Hemmera, dated May 2016.