



VIA EMAIL: regulatory@wing.ca

File: 26250-20/9930
Site ID: 9930

September 5, 2023

Ms. Christine Kennedy
Woodfibre LNG General Partner Inc., Inc. No. A0125267
900 – 1185 West Georgia Street
Vancouver, BC V7Y 1A1

Dear Christine Kennedy:

**Re: Approval in Principle – Approval in Principle (AiP) Area
Squamish (Woodfibre) Pulp Mill, Squamish, BC**

Please find enclosed an Approval in Principle respecting the contaminated site referenced above.

Please be advised that it is acceptable to the Director that risk control requirements outlined in Schedule B condition 2(d) of the 2014 Certificate of Compliance for Site ID 9930 are temporarily suspended during redevelopment and decommissioning activities outlined in the remediation plan listed in Schedule D of the Approval in Principle. The temporary suspension of this condition is subject to reinstatement of risk controls as outlined in the remediation plan.

In addition to the conditions set out in Schedule B of the Approval in Principle, please be advised of the following:

1. Information about the site will be included in the Site Registry established under the *Environmental Management Act*.
2. The provisions of this Approval in Principle are without prejudice to the right of the Director to make orders or impose requirements as the Director may deem necessary in accordance with applicable laws. Nothing in this Approval in Principle will restrict or impair the Director's powers in this regard.
3. A qualified environmental consultant should be available to identify, characterize and appropriately manage:

- (a) any environmental media that may be contaminated, or
 - (b) removal of soil under the provisions of Part 8 of the Contaminated Sites Regulation and may be encountered during any future work at the site.
4. This Approval in Principle does not authorize entry upon, crossing over, or use for any purpose of private or Crown lands or works, unless and except as authorized by the owner of such lands or works. The responsibility for obtaining such authority rests with the persons undertaking remediation. It is also the responsibility of those persons to ensure that all activities conducted under this Approval in Principle are carried out with due regard to the rights of third parties, and comply with other applicable legislation that may be in force.
 5. Additional permits and approvals may be required before remediation begins.
 6. All site materials (e.g., excavated soil, replaced soil, groundwater from dewatering, pumping, well development etc.) must be characterized and managed in accordance with applicable legislation and ministry guidance.
 7. Groundwater wells that are no longer required must be properly decommissioned in accordance with the *Water Sustainability Act's* Groundwater Protection Regulation.
 8. Please be advised that there are inherent health and safety risks associated with remediation activities at contaminated sites. Development of site-specific work procedures in accordance with WorkSafeBC regulations is warranted. Please direct related questions to the WorkSafeBC office at 604-276-3100 (Lower Mainland only) or 1-888-621-7233 (toll free in B.C.).
 9. Any substantial modifications to the approved remediation plan, including substantial changes to the remediation schedule, conditions or circumstances described in the risk assessment upon which the remediation plan is based, or changes in land use, must be promptly identified by written submission to the Director.
 10. If an application for a Certificate of Compliance is to be submitted for the site, the confirmation of remediation report accompanying the application must demonstrate compliance with the remediation standards and criteria in force at the time the application for the Certificate is made, which may differ from the remediation standards and criteria in force at the time of issuance of this Approval in Principle.

Issuance of this Approval in Principle is a decision that may be appealed under Part 8 of the *Environmental Management Act*.

If you require clarification of any aspect of this Approval in Principle, please contact the undersigned at Site@gov.bc.ca.

Yours truly,



Janet Barrett, M.Sc., P.Eng.
Senior Contaminated Sites Officer

Enclosure

cc:

Kate Brandon, District of Squamish
kbrandon@squamish.ca

Client Information Officer, ENV, Victoria
csp_cio@Victoria1.gov.bc.ca

Anna Popova, CSAP Society
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Sumeet Dogra, Keystone Environmental Ltd.
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Stefan Quaglia, Trillium Environmental Ltd.
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APPROVAL IN PRINCIPLE
(Pursuant to Section 53 of the *Environmental Management Act*)

THIS IS TO CERTIFY that the remediation plan described herein submitted by Woodfibre LNG General Partner Inc., Inc. No. A0125267 (“responsible person”) for the contaminated site identified in Schedule A of this document has been approved.

When implemented, the remediation plan must be implemented in accordance with the requirements and conditions specified in Schedule B.

The substances for which remediation will be conducted and for which this Approval in Principle is valid are specified in Schedule C.

I have issued this Approval in Principle based on a review of the documents listed in Schedule D. I, however, make no representation or warranty as to the accuracy or completeness of that information.

A Director may rescind this Approval in Principle if conditions imposed in the Approval in Principle are not complied with or any fees payable under Part 4 of the Act or regulations are outstanding.

This Approval in Principle should not be construed as an assurance that there are no hazards present at the site.

September 5, 2023
Date Issued


Janet Barrett
For Director, *Environmental Management Act*

Schedule A

The site covered by this Approval in Principle is portions of former Squamish (Woodfibre) Pulp Mill, Squamish, BC property (the "Site"). The PID and legal description for which the Site is portions of are:

Lot A District Lots 2351 and 8295 Group 1 New Westminster District Plan EPP86843
PID: 031-814-026

Lot 1 District Lots 2802 and 8294 Group 1 New Westminster District Plan EPP86842
PID: 031-813-992

District Lot 5899, Group 1 New Westminster District, Except Part in Reference Plan 5238
PID: 015-822-061

District Lot 6237 Group 1 New Westminster District, Except Plan EPP86841
PID: 015-791-611

The Site is legally known and described by the following two metes and bounds legal description:

Starting at the southwest corner of Lot A District Lots 2351 and 8295 Group 1 New Westminster District Plan EPP86843:

Thence 128° 36' 58" for 35.975 metres to the point of commencement.

Thence 93° 44' 05" for 132.684 metres;

Thence 358° 33' 57" for 18.422 metres;

Thence 09° 39' 24" for 17.908 metres;

Thence 21° 44' 20" for 22.175 metres;

Thence 35° 32' 38" for 102.532 metres;

Thence 47° 30' 10" for 33.373 metres;

Thence 92° 48' 33" for 12.222 metres;

Thence 69° 41' 52" for 13.365 metres;

Thence 33° 29' 05" for 24.770 metres;

Thence 72° 06' 56" for 21.064 metres;

Thence 90° 01' 27" for 27.035 metres;

Thence 186° 23' 55" for 6.096 metres;

Thence 105° 50' 37" for 7.644 metres;

Thence 25° 34' 17" for 10.376 metres;

Thence 101° 05' 35" for 29.551 metres;

Thence 93° 13' 19" for 36.254 metres;

September 5, 2023

Date Issued



Janet Barrett

For Director, *Environmental Management Act*

Thence 66° 57' 57" for 99.415 metres;
Thence 36° 53' 11" for 49.508 metres;
Thence 55° 42' 06" for 34.434 metres;
Thence 101° 47' 21" for 11.255 metres;
Thence 46° 56' 17" for 17.267 metres;
Thence 133° 07' 17" for 8.016 metres;
Thence 47° 28' 30" for 10.585 metres;
Thence 79° 48' 05" for 30.478 metres;
Thence 46° 46' 49" for 34.752 metres;
Thence 37° 19' 41" for 93.801 metres;
Thence 23° 38' 48" for 56.132 metres;
Thence 57° 12' 54" for 22.045 metres;
Thence 345° 02' 33" for 29.159 metres;
Thence 276° 37' 47" for 10.539 metres;
Thence 05° 42' 37" for 11.303 metres;
Thence 77° 23' 48" for 49.531 metres;
Thence 346° 12' 34" for 14.155 metres;
Thence 44° 22' 29" for 8.798 metres;
Thence 76° 40' 45" for 22.159 metres;
Thence 46° 31' 57" for 30.435 metres;
Thence 74° 12' 15" for 40.193 metres;
Thence 68° 24' 56" for 20.116 metres;
Thence 68° 24' 55" for 12.404 metres;
Thence 93° 47' 25" for 10.725 metres;
Thence 149° 24' 43" for 7.995 metres;
Thence 93° 54' 23" for 2.918 metres;
Thence 45° 00' 00" for 5.676 metres;
Thence 80° 02' 21" for 12.874 metres;
Thence 28° 08' 01" for 7.914 metres;
Thence 79° 17' 20" for 8.343 metres;
Thence 330° 03' 26" for 80.437 metres;
Thence 335° 46' 45" for 52.967 metres;
Thence 314° 13' 05" for 19.568 metres;
Thence 294° 57' 46" for 19.278 metres;
Thence 287° 50' 25" for 19.478 metres;
Thence 264° 45' 12" for 63.651 metres;
Thence 270° 40' 53" for 61.581 metres;
Thence 275° 06' 32" for 8.167 metres;
Thence 295° 44' 51" for 21.762 metres;
Thence 292° 58' 22" for 7.426 metres;

September 5, 2023

Date Issued



Janet Barrett

For Director, *Environmental Management Act*

Thence 278° 13' 51" for 14.764 metres;
Thence 270° 00' 00" for 18.031 metres;
Thence 283° 45' 28" for 38.148 metres;
Thence 305° 27' 30" for 42.555 metres;
Thence 310° 37' 39" for 41.993 metres;
Thence 321° 43' 34" for 45.492 metres;
Thence 326° 45' 19" for 47.903 metres;
Thence 323° 22' 39" for 25.615 metres;
Thence 270° 24' 13" for 3.722 metres;
Thence 254° 15' 30" for 2.158 metres;
Thence 143° 37' 01" for 5.273 metres;
Thence 152° 14' 10" for 89.633 metres;
Thence 136° 54' 24" for 41.441 metres;
Thence 146° 46' 24" for 14.689 metres;
Thence 155° 33' 48" for 19.114 metres;
Thence 175° 36' 51" for 2.443 metres;
Thence 186° 22' 07" for 7.544 metres;
Thence 252° 25' 55" for 10.534 metres;
Thence 230° 08' 30" for 24.149 metres;
Thence 239° 11' 20" for 17.043 metres;
Thence 246° 30' 03" for 19.355 metres;
Thence 262° 56' 01" for 45.113 metres;
Thence 255° 13' 46" for 19.796 metres;
Thence 253° 14' 37" for 36.136 metres;
Thence 256° 59' 32" for 14.515 metres;
Thence 266° 19' 36" for 9.885 metres;
Thence 287° 01' 32" for 7.834 metres;
Thence 307° 57' 29" for 4.801 metres;
Thence 324° 51' 26" for 12.906 metres;
Thence 333° 01' 27" for 130.571 metres;
Thence 21° 54' 41" for 9.439 metres;
Thence 32° 33' 15" for 6.291 metres;
Thence 67° 31' 30" for 12.855 metres;
Thence 46° 02' 36" for 14.781 metres;
Thence 36° 35' 22" for 45.033 metres;
Thence 41° 21' 02" for 22.320 metres;
Thence 55° 23' 17" for 15.342 metres;
Thence 66° 15' 37" for 25.768 metres;
Thence 00° 10' 39" for 4.290 metres;
Thence 270° 10' 39" for 12.802 metres;

September 5, 2023

Date Issued



Janet Barrett

For Director, *Environmental Management Act*

Thence 233° 59' 19" for 39.048 metres;
Thence 224° 19' 24" for 89.268 metres;
Thence 201° 33' 18" for 33.638 metres;
Thence 158° 42' 59" for 79.392 metres;
Thence 145° 06' 21" for 109.179 metres;
Thence 187° 58' 24" for 44.795 metres;
Thence 224° 36' 42" for 46.852 metres;
Thence 252° 05' 11" for 48.723 metres;
Thence 278° 31' 09" for 54.399 metres;
Thence 296° 08' 39" for 11.710 metres;
Thence 273° 14' 14" for 9.899 metres;
Thence 252° 32' 16" for 10.021 metres;
Thence 212° 34' 18" for 11.109 metres;
Thence 270° 00' 00" for 19.301 metres;
Thence 188° 48' 56" for 14.752 metres;
Thence 90° 00' 00" for 16.019 metres;
Thence 190° 40' 51" for 32.517 metres;
Thence 182° 33' 18" for 28.427 metres;
Thence 187° 38' 53" for 9.004 metres;
Thence 185° 47' 08" for 18.615 metres;
Thence 164° 35' 45" for 12.301 metres;
Thence 150° 13' 05" for 11.349 metres;
Thence 114° 46' 14" for 11.296 metres;
Thence 99° 49' 46" for 21.146 metres;
Thence 102° 21' 12" for 18.515 metres;
Thence 119° 07' 31" for 15.247 metres;
Thence 148° 31' 25" for 42.155 metres;
Thence southerly being an arc of a 57.325 metre radius curve having a radial bearing of 242° 40' 25" to the centre of said curve and a radial bearing of 307° 45' 52" to the end of said curve an arc distance of 65.124 metres;
Thence 223° 52' 38" for 147.610 meters;
Thence 215° 11' 24" for 243.190 metres;

Returning to the point of commencement.

Starting at the northwest corner of District Lot 5899, Group 1 New Westminster District, Except Part in Reference Plan 5238:

Thence 90° 16' 15" for 125.413 metres to the point of commencement.
Thence 90° 16' 15" for 148.169 metres;
Thence 180° 07' 30" for 119.501 metres;
Thence 270° 24' 13" for 43.203 metres;

September 5, 2023
Date Issued


Janet Barrett
For Director, *Environmental Management Act*

Thence 326° 22' 11" for 11.536 metres;
Thence 319° 15' 40" for 7.859 metres;
Thence 286° 37' 19" for 27.804 metres;
Thence 270° 11' 10" for 66.931 metres;
Thence 00° 13' 47" for 96.167 metres;
Returning to the point of commencement.

The site contains part of a legal parcel depicted in engineering drawings prepared by Keystone Environmental Ltd. on March 21, 2023.

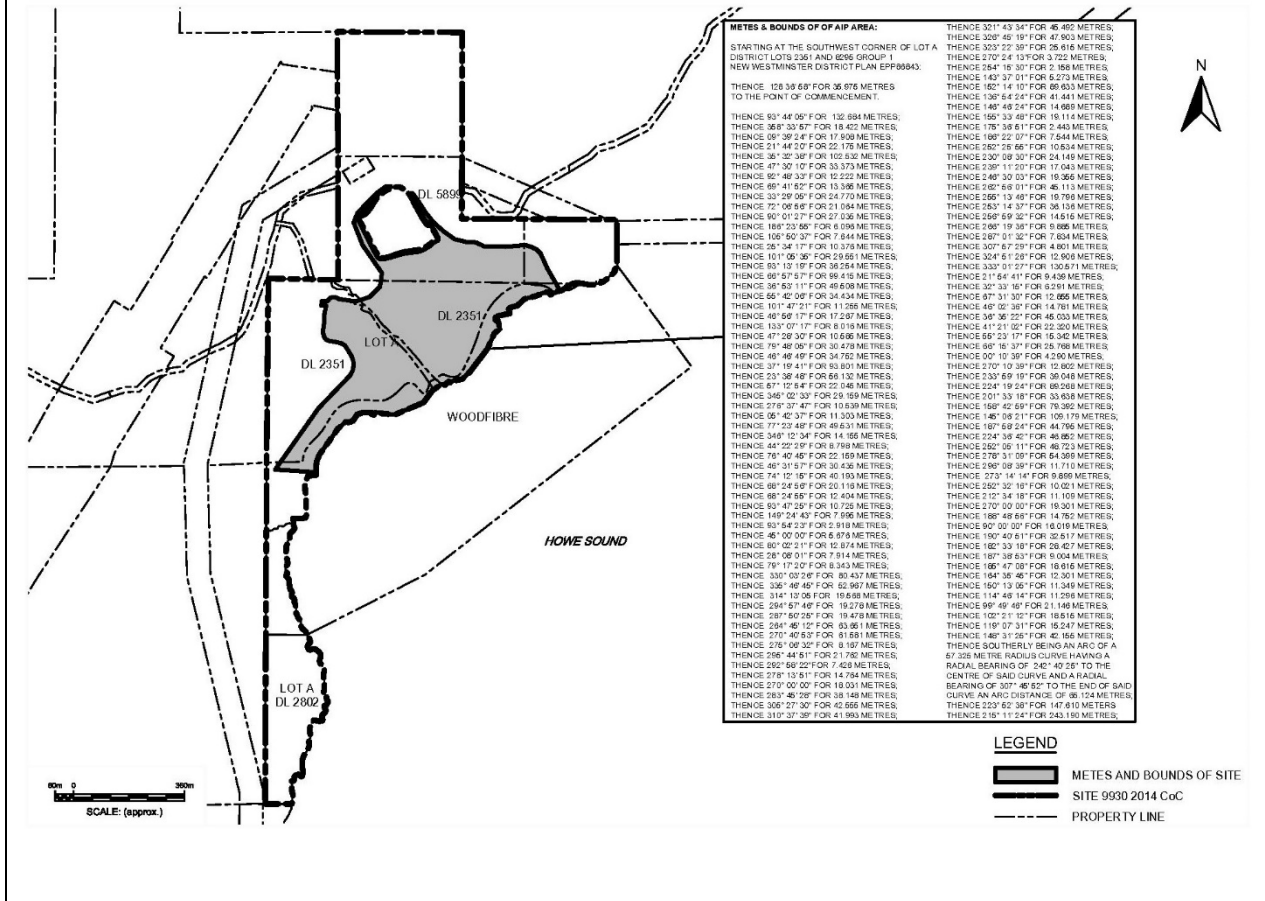
The approximate centre of the site using the NAD (North American Datum) 1983 convention is:

Latitude: 49° 39' 56.00"
Longitude: 123° 15' 13.00"

September 5, 2023
Date Issued

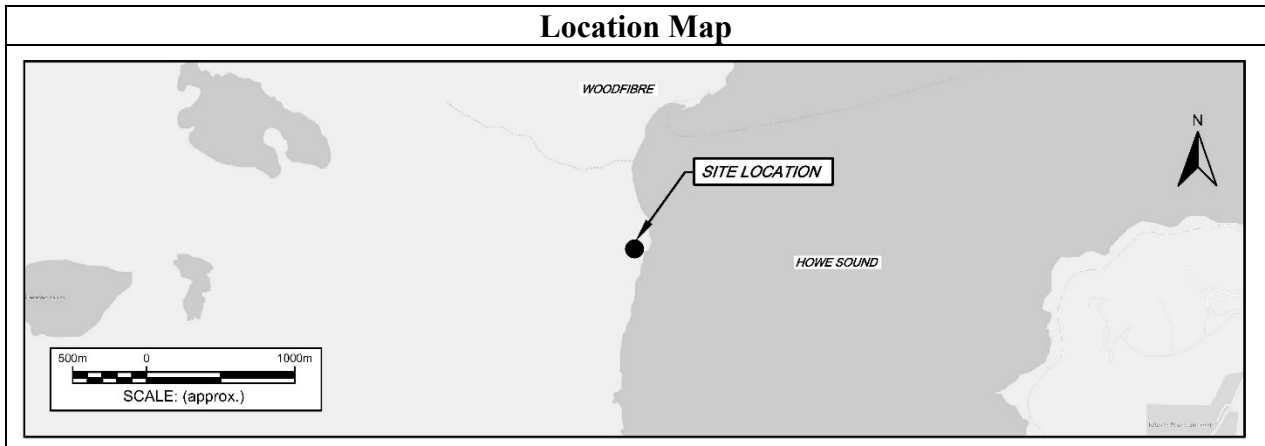
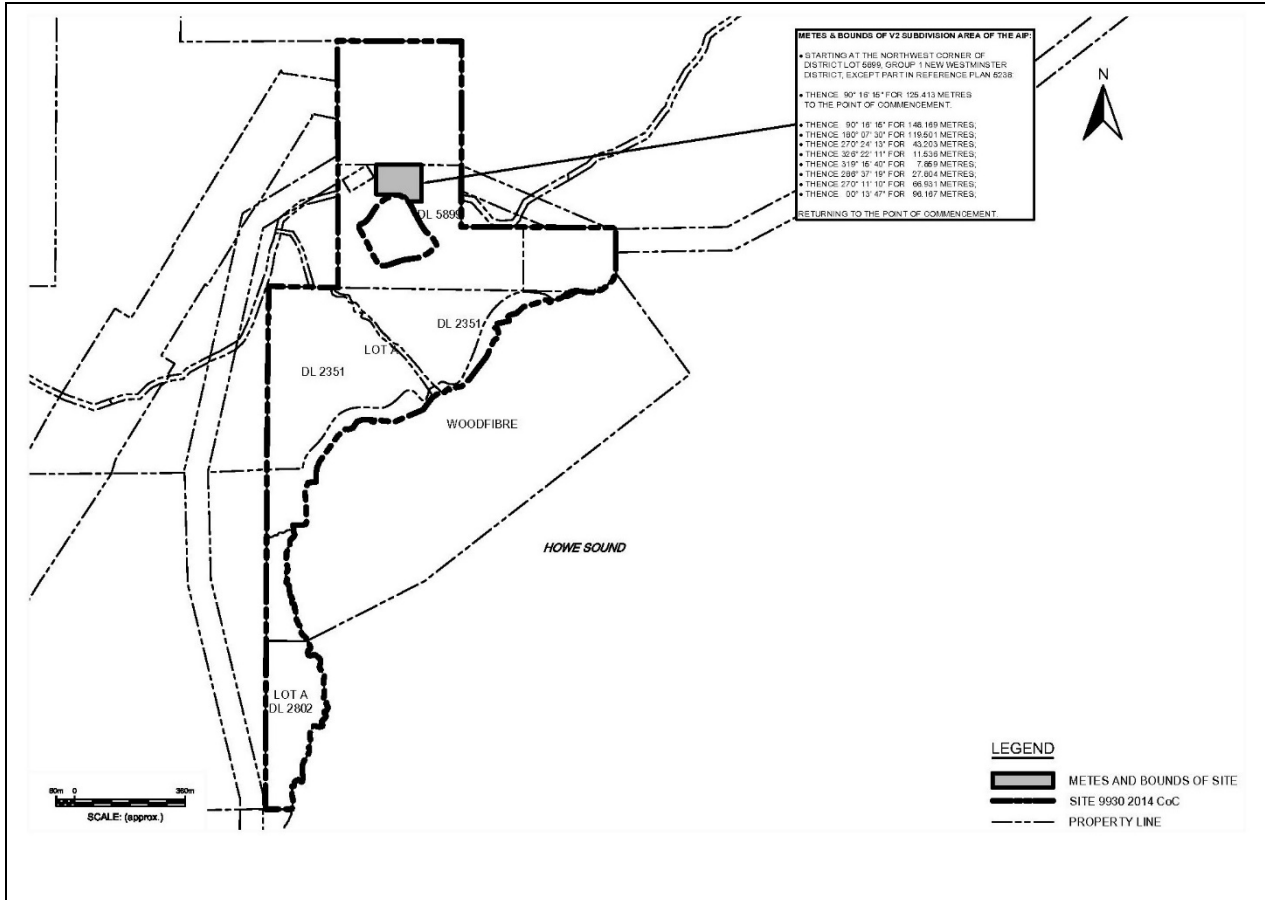

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Site Plan



September 5, 2023
 Date Issued

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September 5, 2023
Date Issued

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For Director, Environmental Management Act

Schedule B

Requirements and Conditions

1. Remediation, including monitoring, inspections and maintenance of any works, must be undertaken by the responsible person in the manner and schedule specified in the plan listed in Schedule D or as specified in a modification of the plan approved by the Director.
2. Any substantial modifications to the approved remediation plan, including substantial changes to the remediation schedule, or circumstances described in the risk assessment upon which the remediation plan is based, or changes in land, vapour, water, or sediment use, must be promptly identified in a written submission by the responsible persons to the Director. An application for an amendment or new Approval in Principle may be necessary.
3. Up-to-date records of monitoring, inspections and maintenance of any works must be maintained by the responsible person or their agent. The records must be available for inspection by the Director.
4. Remediation must be completed within five years of the date of issuance of this Approval in Principle.
5. Remediation must be confirmed in accordance with applicable legislation and ministry guidance. Within 90 days of completing remediation, a report summarizing confirmation of remediation must be prepared in accordance with section 49 (2) of the Contaminated Sites Regulation and submitted to the Director.
6. A statement signed by an Approved Professional must be submitted to the Director annually within 90 days of the anniversary of the date of issuance of this Approval in Principle. The statement must include the following:
 - (a) A summary of remedial activities undertaken during the reporting period; and
 - (b) An assessment comparing remediation progress to the actions and schedule set out in the plans referenced above. Refer to Condition 3 above if remedial progress differs substantially from the schedule set out in the approved plan.

If requested by the Director, a report signed by an Approved Professional must be submitted for review to the Director and must include the following:

- (a) A summary of remedial activities undertaken to date;

September 5, 2023
Date Issued


Janet Barrett
For Director, *Environmental Management Act*

- (b) An assessment comparing remediation progress to the actions and schedule set out in the plans referenced above. Refer to Condition 3 above if remedial progress differs substantially from the schedule set out in the approved plan;
 - (c) Supporting documentation (e.g., analytical reports, records of inspection, maintenance of treatment works, etc.).
7. The documents listed in Schedule D indicate that vapour attenuation factors were applied to meet Contaminated Sites Regulation numerical standards at the site. These vapour attenuation factors were selected based on assumptions about the structures, locations and depths of buildings existing or expected at the site. These assumptions include the following:
- (a) *Any existing structures or proposed structures for the site are/will be slab-on-grade or have a concrete basement.*

Any inconsistencies that arise between the structures, locations and depths of proposed or constructed buildings at the site and the range of structures, locations and depths of buildings assumed in the selection of vapour attenuation factors in the documents listed in Schedule D must be promptly identified by the responsible person in a written submission to the Director. An application for an amendment or new Approval in Principle may be necessary.

September 5, 2023
Date Issued


Janet Barrett
For Director, *Environmental Management Act*

Schedule C

Substances and Uses

Substances to be remediated in soil for industrial land soil use:

To meet risk-based remediation standards:

antimony	7440-36-0
arsenic	7440-38-2
barium	7440-39-3
benzene	71-43-2
chromium	7440-47-3
copper	7440-50-8
HEPHs	NA
lead	7439-92-1
LEPHs	NA
nickel	7440-02-0
tin	7440-31-5
zinc	7440-66-6

September 5, 2023

Date Issued



Janet Barrett

For Director, *Environmental Management Act*

Schedule D

Documents

Summary of Site Condition, Approval in Principle (AiP) Area – Squamish (Woodfibre) Pulp Mill, Squamish, BC, Keystone Environmental Ltd., May 1, 2023;

Stage 1 Preliminary Site Investigation Update, Analytical Data Review and Remediation Plan, Approval in Principle (AiP) Area – Squamish (Woodfibre) Pulp Mill, Squamish, BC, Keystone Environmental Ltd., March 31, 2023;

Human Health and Ecological Risk Assessment, Approval in Principle (AiP) Area – Squamish (Woodfibre) Pulp Mill, Squamish, BC, Keystone Environmental Ltd., March 31, 2023;

Stage 1 Preliminary Site Investigation and Baseline Assessment, Portion of D.L. 5899, Fortis V2 Subdivision Area, Woodfibre, Squamish, BC, Keystone Environmental Ltd., January 5, 2023;

Debris Assessment - Proposed FortisBC Work Areas, Keystone Environmental Ltd., October 21, 2022;

DRAFT Hydrogeochemical Assessment in Support of Effluent Discharge Permit (EDP), Subsurface Investigation Report, Woodfibre LNG Site, Squamish, BC, Stantec Consulting Ltd., September 1, 2021.

Soil Characterization from Surficial and Investigative Drilling Programs, Woodfibre Site, Squamish BC, Keystone Environmental Ltd., May 26, 2021;

Certificate of Compliance - Uplands Portion - Woodfibre Squamish Pulp Mill, Woodfibre, British Columbia, Ministry of Environment, December 22, 2014;

Summary of Site Condition, Site ID 9930, Tetra Tech EBA Inc., GeoEnviroLogic Inc. and Azimuth Consulting Group, November 28, 2014;

Performance Verification Plan for Certificate of Compliance at Former Squamish Pulp Mill, Woodfibre, BC (Uplands Portion) MOE Site ID: 9930, Keystone Environmental Ltd., November 28, 2014;

Uplands Human Health and Ecological Risk Assessment - Addendum #1, Former Squamish Pulp Mill, Woodfibre, BC, Keystone Environmental Ltd., November 28, 2014;

September 5, 2023
Date Issued


Janet Barrett
For Director, Environmental Management Act

Confirmation of Remediation Former Squamish Pulp Mill Site, Woodfibre, BC, Keystone Environmental Ltd., November 28, 2014;

Preliminary Site Investigation, Stage 1, Preliminary Site Investigation, Stage 2, Detailed Site Investigation and Supplementary Site Investigation Former Squamish Pulp Mill Site, Woodfibre, BC, Keystone Environmental Ltd., October 10, 2014;

Uplands Human Health and Ecological Risk Assessment Former Squamish Pulp Mill, Woodfibre, BC, Keystone Environmental Ltd., October 10, 2014;

Historical Waste Asbestos Disposal Area Closure Plan, former Squamish Pulp Mill, Squamish, BC, Keystone Environmental Ltd., October 10, 2014;

Application for Water Use Determination, Woodfibre Mill, BC, Ministry of Environment, August 15, 2014;

Preliminary Site Investigation Stage 1, Western Pulp Ltd. Squamish Pulp Mill, Squamish, BC, Keystone Environmental Ltd., August 19, 2005;

Phase 2 Landfill, Woodfibre, BC, Gartner Lee Ltd., January 1997; and

Design Report: Woodfibre Mill Landfill, Klohn Leonoff Ltd., April 1, 1992.

September 5, 2023
Date Issued


Janet Barrett
For Director, *Environmental Management Act*