



**VIA EMAIL**

Victoria File: 26250-20/4879, 29185  
Site ID: 4879, 29185

January 30, 2025

Antonio Marinelli  
Conwest (Viscount) Limited Partnership  
401 – 1930 Pandora Street  
Vancouver, BC V5L 0C7  
[michelle.sotomayor@bc.com](mailto:michelle.sotomayor@bc.com)

**Re: Approval in Principle – 13200 Vulcan Way and 2611 Viscount Way,  
Richmond, BC**

Dear Antonio Marinelli:

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

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 professional 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 that 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](mailto:site@gov.bc.ca).

Yours truly,



Ingrid Sorensen, M.A.Sc., R.P.Bio Senior  
Risk Assessment Officer

Enclosure

cc: City of Richmond  
[building@richmond.ca](mailto:building@richmond.ca)

Brent McGlashan, Bank of Montreal  
[Brent.McGlashan@bmo.com](mailto:Brent.McGlashan@bmo.com)

Client Information Officer, ENV, Victoria  
[csp\\_cio@Victoria1.gov.bc.ca](mailto:csp_cio@Victoria1.gov.bc.ca)

Brent Olson, Keystone Environmental Ltd.  
[bolson@keystoneenvironmental.ca](mailto:bolson@keystoneenvironmental.ca)

Michael McLeay, Keystone Environmental Ltd.  
[mmcleay@keystoneenvironmental.ca](mailto:mmcleay@keystoneenvironmental.ca)

CSAP Society [submissions@csapsociety.bc.ca](mailto:submissions@csapsociety.bc.ca)



Ministry of  
Environment  
and Parks

**APPROVAL IN PRINCIPLE**  
**(Pursuant to Section 53 of the *Environmental Management Act*)**

**THIS IS TO CERTIFY** that the remediation plan described herein for the contaminated site identified in Schedule A of this document has been approved in principle.

The remediation plan must be implemented by the responsible person in accordance with the requirements and conditions specified in Schedule B.

A director may rescind this Approval in Principle if imposed conditions are not complied with or if any fees payable under Part 4 of the Act or regulations are outstanding. A director retains the right under section 60 of the Act to take future action if additional relevant information, site activities or actions by the responsible person indicate that it is warranted.

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

The issuance of this Approval in Principle is based on a review of relevant information including the documents listed in Schedule D. No representation or warranty is made as to the accuracy or completeness of that information.

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

January 30, 2025  
Date Issued

  
Ingrid Sorensen  
For Director, *Environmental Management Act*

## Schedule A

The site covered by this Approval in Principle is located at 13200 Vulcan Way & 2611 Viscount Way, Richmond, British Columbia, which is more particularly known and described as:

LOT "C" SECTION 20 BLOCK 5 NORTH RANGE 5 WEST NEW WESTMINSTER  
DISTRICT PLAN 25054  
PID: 003-752-305  
13200 Vulcan Way, Richmond, BC

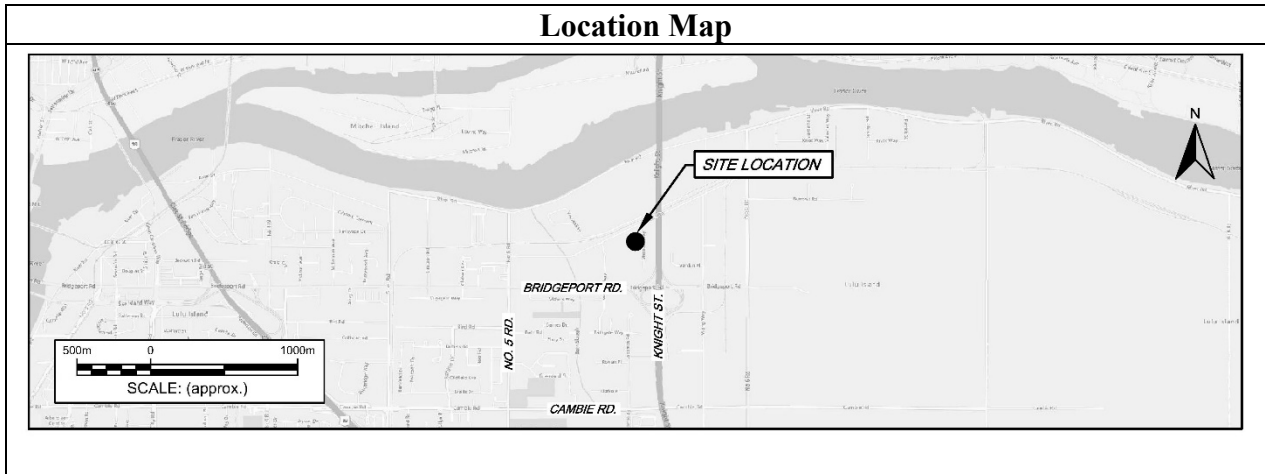
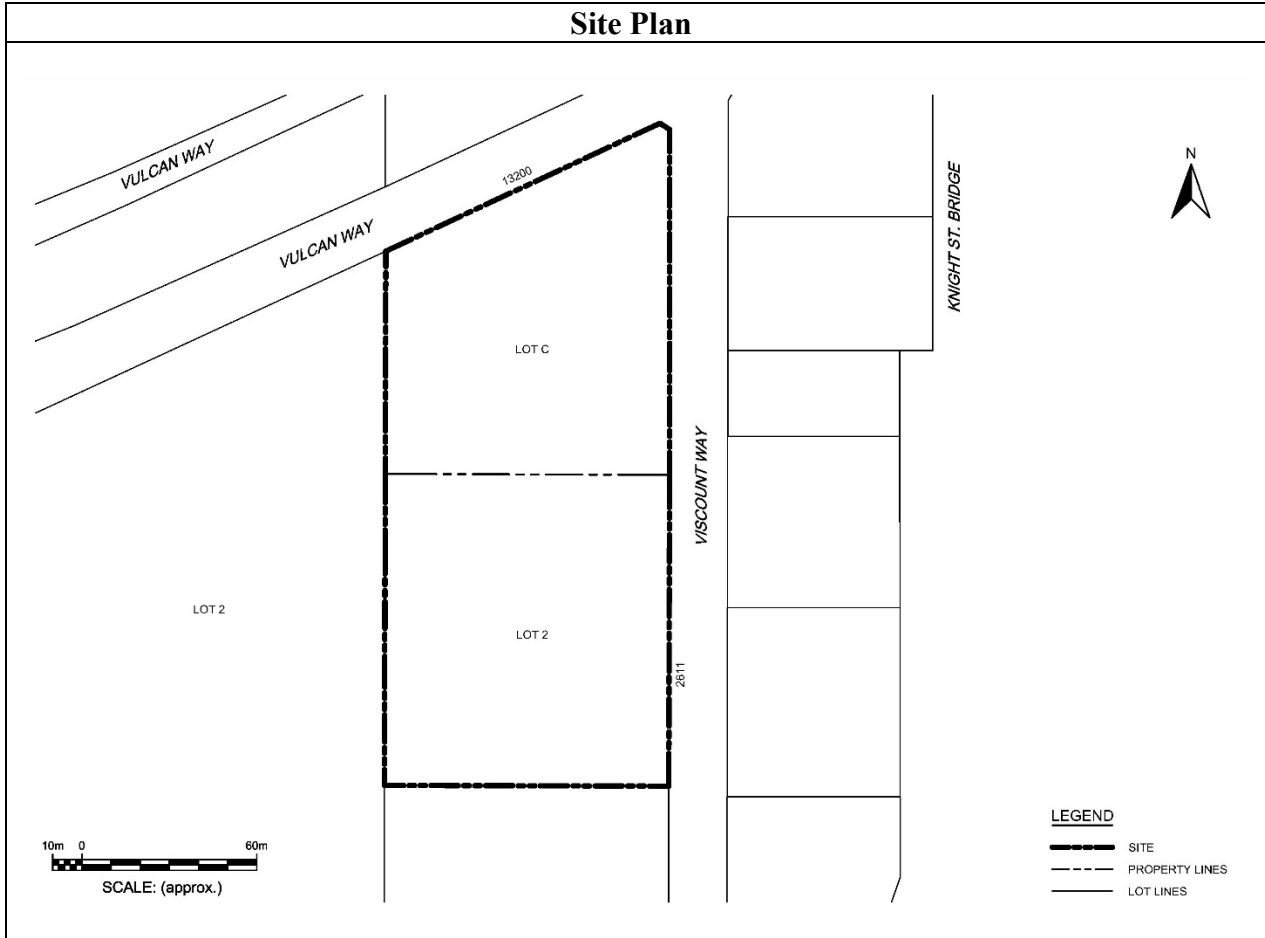
LOT 2 SECTION 20 BLOCK 5 NORTH RANGE 5 WEST NEW WESTMINSTER DISTRICT  
PLAN 79060  
PID: 011-973-811  
2611 Viscount Way, Richmond, BC

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

Latitude: 49° 11' 41.00"  
Longitude: 123° 4' 46.7 "

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## Schedule B

### Requirements and Conditions

The following requirements and conditions must be met by the responsible person:

1. Remediation, including outstanding investigation, 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 investigation or remediation schedule, conditions or circumstances described in the risk assessment upon which the remediation plan is based, or changes in land, vapour, water use, must be promptly identified in a written submission by the responsible person 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.

Supplementary site investigations must be undertaken as summarized in the approved remediation plan until delineation is complete. Delineation details must be documented and submitted to the director within 5 years of the date of issuance of the Approval in Principle.

Supplementary site investigation details are to be submitted to the director in a revised detailed site investigation report, in accordance with section 59 of the Contaminated Sites Regulation OR in a confirmation of remediation report in accordance with section 49 (2) of the Contaminated Sites Regulation as outlined below.

Remediation and supplemental investigation must be completed within 5 years of the date of issuance of this Approval in Principle.

Remediation must be confirmed in accordance with applicable legislation and ministry guidance. A report summarizing supplemental investigation activities, as specified in the approved remediation plan and confirmation of remediation report, prepared in accordance with section 49 (2) of the Contaminated Sites Regulation, must be submitted to the director within 90 days of completing remediation.

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A statement signed by an Approved Professional must be submitted to the director annually. The statement must include the following:

- (a) A summary of investigation activities undertaken during the reporting period;
- (b) A summary of remedial activities undertaken during the reporting period; and
- (c) An assessment comparing investigation and remediation progress to the actions and schedule set out in the plan referenced above. Refer to Condition 2 if 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 investigation and remedial activities undertaken to date;
- (b) An assessment comparing investigation and remediation progress to the actions and schedule set out in the plan referenced above. Refer to Condition 2 if investigation or remedial progress differs substantially from the schedule set out in the approved plan;
- (c) Interpretation of current and cumulative monitoring results from the soil, vapour, and groundwater;
- (d) Evaluation of the performance of the institutional and/or engineering controls; and
- (e) Supporting documentation (e.g., analytical reports, records of inspection, maintenance of treatment works, etc.).

The documents listed in Schedule D indicate that vapour attenuation factors were applied to meet Contaminated Sites Regulation numerical standards at and adjacent to 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) Proposed buildings at the site will be of slab-on-grade construction at current or higher ground surface elevations.*
- (b) Groundwater is not in contact with the foundation slab and there is no active pumping or drawdown of groundwater at the site.*
- (c) Subsurface vapour is not under pressure.*

Any inconsistencies that arise between the structures, locations and depths of proposed or constructed buildings at or adjacent to 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.

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## Schedule C

### Uses, Substances and Chemical Abstract Numbers

#### *Substances to be remediated in soil for industrial soil use:*

To meet risk-based remediation standards:

Chromium (total and trivalent)	7440-47-3, 16065-83-1
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#### *Substances to be remediated in water for aquatic life fresh and marine water use:*

To meet risk-based remediation standards:

boron	7440-42-8
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#### *Substances to be remediated in water for drinking water use:*

To meet risk-based remediation standards:

boron	7440-42-8
dichloroethylene, 1,2 cis -	156-59-2
vanadium	7440-62-2
vinyl chloride	75-01-4

#### *Substances evaluated in soil for industrial soil use:*

To meet local background concentrations:

selenium	7782-49-2
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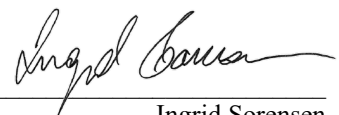
*Substances evaluated in water for drinking water use:*

To meet local background concentrations:

arsenic	7440-38-2
chromium (total)	7440-47-3
cobalt	7440-48-4
iron	7439-89-6
lithium	7439-93-2
mercury	7439-97-6
nickel	7440-02-0
sodium ion	17341-25-2

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## Schedule D

### Documents

*Summary of Site Condition, 13400 Vulcan Way and 2611 Viscount Way, Richmond, BC, Keystone Environmental Ltd., November 2024*

*Record of Communications with the owners of a portion of 2700 Sweden Way, Richmond, BC, Keystone Environmental Ltd., November 2024.*

*Report of Findings - Stage 1 Preliminary Site Investigation, Detailed Site Investigation, and Remediation Plan, 13200 Vulcan Way & 2611 Viscount Way and a portion of 2700 Sweden Way, Richmond, BC, Keystone Environmental Ltd., November 2024*

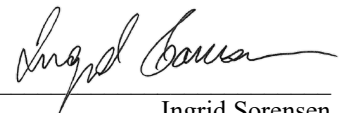
*Report of Findings - Human Health and Ecological Risk Assessment, 13200 Vulcan Way and 2611 Viscount Way, and a portion of 2700 Sweden Way, Richmond, BC, Keystone Environmental Ltd., November 2024*

*Performance Verification Plan for Approval in Principle, 13200 Vulcan Way and 2611 Viscount Way, Richmond, BC, Keystone Environmental Ltd., November 2024*

*Report of Findings - Detailed Site Investigation of Off-Site Conditions, 2611 Viscount Way and a portion of 2700 Sweden Way, Richmond, BC, Keystone Environmental Ltd., September 2024*

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