

**GUIDELINES FOR CONTAMINATED SITES APPROVED PROFESSIONAL
SERVICES ON ELIGIBLE SITES, Version September 28, 2007
Society of Contaminated Sites Approved Professionals of British Columbia**

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1.0 DEFINITIONS

The definitions in this section are specific to these guidelines for work conducted by a Contaminated Sites Approved Professional (CSAP) under the BC CSR and related protocols, procedures and guidelines.

“Act” means the British Columbia *Environmental Management Act*.

“Agreement” means the contract, whether formal (written) or informal (verbal or implied), between the Client and the CSAP, or other legal entity, for conducting the CSAP work.

“Arm’s-Length Review” means CSAP work involving the review of reports, plans and assessments that were not prepared by the CSAP engaged to perform the CSAP work or under the CSAP’s Direct Supervision.

“Client” means the party who engages the CSAP to conduct the CSAP work. This is typically the owner of the site, but can be the Ministry or another party.

“Confirmation of Remediation Report” means a confirmation of remediation report as defined in the CSR.

“Contaminated Sites Approved Professional” and **“CSAP”** mean a Member of the Society who performs contaminated sites approved professional work under section 49.1 of the CSR and related protocols, procedures and guidelines as amended from time to time, unless otherwise indicated.

“Contaminated Sites Regulation” and **“CSR”** mean the Contaminated Sites Regulation under the Act.

“CSAP work” means a submission, including advice and recommendations, to the Ministry Director respecting

- i) a determination of status;
- ii) a contaminated soil relocation agreement;
- iii) an approval in principle of a remedial plan;
- iv) a certificate of compliance; or,
- v) a summary of site condition.

“Detailed Site Investigation” or **“DSI”** means a detailed site investigation as defined in CSR Section 59.

“Detailed Risk Assessment” and **“DRA”** means a risk assessment or environmental risk assessment report as defined in the CSR that is carried out for an Eligible Site as defined in a protocol established by the Ministry.

“Direct Supervision” means responsibility by a CSAP for the direction, management and conduct of professional services by others.

“Eligible Site” means a category of contaminated sites eligible for review and recommendation to the Ministry Director for issuance of an Instrument by a CSAP as defined in a protocol under the CSR.

“Hazardous Waste Regulation” and **“HWR”** means the Hazardous Waste Regulation under the Act.

“Instrument” means a preliminary or final determination of status, contaminated soil relocation agreement, approval in principle of a remedial plan or a certificate of compliance as defined in the Act and Regulations.

“Member” means a member of the Society that is also appointed to the Roster of Approved Professionals by the Ministry Director.

“Ministry” means the British Columbia Ministry responsible for administering the Act.

“Ministry Director” means the “director” as defined in the Act and the CSR.

“Numerical Standards” means generic numerical soil standards, generic numerical water standards, matrix numerical soil standards, generic numerical sediment criteria, director's interim standards and criteria, and site-specific numerical standards of the CSR.

“Parent Organization” means the Association of Professional Engineers and Geoscientists of British Columbia, the College of Applied Biology or the British Columbia Institute of Agrologists.

“Preliminary Site Investigation” or **“PSI”** means a preliminary site investigation as identified in CSR Section 58.

“Regulations” means the HWR and CSR.

“Remediation Plan” means a remediation plan as defined in the CSR.

“Risk Assessment Approved Professional” and **“RAAP”** means a classification of CSAP qualified to undertake review of Detailed Risk Assessments on Eligible Sites.

“Risk-Based Standards” means risk-based standards defined in the CSR.

“Self-Review” means CSAP work involving review of reports, plans and assessments prepared by the CSAP engaged to perform the CSAP work or under the CSAP’s Direct Supervision.

“**Society**” means the Society of Contaminated Sites Approved Professionals of British Columbia.

“**Summary of Site Condition**” means the Ministry document with components summarizing site information and submission documents, to be completed and reviewed by the CSAP.

2.0 INTRODUCTION

CSAPs in British Columbia make recommendations to the Ministry concerning issuance of Instruments. Under this system, the Ministry and the public place a high degree of trust in CSAPs, that issues associated with the investigation, remediation and management of contaminated sites have been appropriately reviewed and addressed, and that requirements of the Act and Regulations have been met.

These guidelines have been developed on behalf of the Society, with funding provided by the Ministry. The guidelines have been prepared with the assistance of a working group of contaminated sites practitioners.

2.1 Purpose of Guidelines

These guidelines are intended to establish practice guidance that CSAPs should follow to fulfill their professional obligation to the Society, the Ministry and for protection of human health and the environment. The guidelines specify tasks and identify general standards of professional practice that CSAPs should follow in conducting CSAP work. The guidelines also serve as a basis for performance assessments for CSAP work under the bylaws of the Society. These guidelines identify the major points that CSAPs should consider when undertaking CSAP work. Additional details are provided through links to appendices identified at the end of these guidelines and should also be considered by CSAPs in conducting their work.

Exercising of professional judgment is an integral part of providing CSAP services. Accordingly, application of these guidelines will vary depending on the circumstance.

2.2 Scope of Guidelines

These guidelines apply to CSAP services provided for Eligible Sites. These services involve review of reports, plans and assessments pertaining to the investigation, remediation and management of contaminated sites, and preparation and submission of recommendations and related documents and forms to the Ministry for issuance of Instruments. These guidelines outline professional services that should generally be performed when undertaking CSAP work.

CSAP work may also involve taking into account guidelines and requirements of agencies other than the Ministry. CSAPs are expected to have a working understanding of such guidelines and requirements and, in some cases, to resolve issues with other agencies prior to completing the CSAP work.

2.3 Qualification

Notwithstanding the purpose and scope of the guidelines, a decision by a CSAP not to follow one or more aspects of these guidelines does not mean that the CSAP has failed to meet the standard of care in the performance of the CSAP's professional services. Such judgments and decisions depend on an evaluation of facts and circumstances to determine if other reasonable and prudent CSAPs, in similar circumstances, would have reached similar conclusions. When deviating from these guidelines, it is essential that the CSAP clearly document the basis for deviation.

3.0 PROJECT ORGANIZATION AND RESPONSIBILITIES

3.1 *Common Forms of Project Organization*

The organization of CSAP work varies according to the needs of the project and parties involved. The CSAP is engaged by the Client who is typically a landowner, but can be another interested party, for example, the Ministry or another environmental professional who is not a CSAP. This form of project organization is unique for professional services in that the CSAP maintains a standard of care to the Ministry, which in most instances is not the Client.

3.2 *Responsibilities of Organization Participants*

3.2.1 Client

The Client should:

- a) before commencing the CSAP work, complete a written agreement with the CSAP confirming the scope, compensation and schedule for CSAP services;
- b) disclose fully and promptly to the CSAP being engaged all information (written or otherwise) related to the CSAP work;
- c) disclose promptly to the CSAP being engaged any previous involvement by other CSAPs regarding issues related to the CSAP work; and,
- d) recognize that the need may arise during the CSAP work for clarification or additional work associated with the reports, plans and assessments submitted for review before the CSAP is able to recommend to the Ministry Director for issuance of an Instrument.
- e) resolve issues of prohibited practise as described under Section 3.2.3.6.

3.2.2 Ministry

The Ministry should:

- a) Respond promptly in writing to questions submitted by the CSAP's concerning interpretation of sections of the Act, Regulations, protocols, and Ministry policy, procedures and guidance.

3.2.3 Contaminated Sites Approved Professional

- 3.2.3.1 The CSAP is responsible for reviewing reports, plans, assessments and other documents, which are submitted in support of a recommendation for issuance of an Instrument. The final accountability for the merits of the recommendation to the Ministry Director lies with the recommending CSAP(s).
- 3.2.3.2 Before establishing an agreement for services, the CSAP should determine if he has a conflict of interest with respect to conducting the CSAP work. If the CSAP has a personal interest in the outcome of the CSAP work, the CSAP must not conduct the work. If the performance of CSAP work can reasonably be foreseen to result in a conflict of interest, the CSAP should not conduct the work. If there is a potential conflict of interest at any time before or during performance of the CSAP work, the CSAP must inform and resolve the potential conflict with the interested parties. If the CSAP has a current or previous involvement with the site or affected off-site areas, the CSAP must disclose the nature of that involvement in writing, to the Client prior to conducting CSAP work.
- 3.2.3.3 The CSAP is responsible for confirming that the requested CSAP work qualifies for CSAP services and in particular that the site for which the work is requested is an Eligible Site.
- 3.2.3.4 If the CSAP intends to perform Self-Review, he is responsible for determining that the CSAP work is eligible for Self-Review.
- 3.2.3.5 The primary responsibility of the CSAP is to determine if the work reviewed meets requirements of the Act and Regulations. Because other legislation, regulation, bylaws and guidelines may also need to be complied with or recognized to remediate or manage a contaminated site, it is also the responsibility of the CSAP to determine, using a reasonable level of diligence, if required aspects of other relevant environmental legislation and guidelines have been followed.
- 3.2.3.6 If, during the course of his review, the CSAP becomes aware of a prohibited practise, (for example, lack of notification of independent remediation, lack of notification of potential for off-site migration of contamination, lack of timely notification of the Ministry of changes to remediation completed under an AiP, relocation of contaminated soil without a CSRA when a CSRA is required, blending of hazardous waste, transporting of a hazardous waste without manifest, etc.), the CSAP must bring this to the attention of the Client in writing. The Client must resolve the prohibited practise to the satisfaction of the CSAP prior to the CSAP recommending an Instrument. These issues often require resolution with the Ministry.
- 3.2.3.7 In conducting the CSAP work, the CSAP must rely on reports, plans, assessments or other documents prepared by others. Although it is the responsibility of the

- CSAP to determine if mandatory requirements of the Act and Regulations have been met, it is not the responsibility of the CSAP to conduct sampling and analysis of environmental media to independently verify the findings of work by others. It is the responsibility of the CSAP, however, to make reasonable efforts to confirm that the data have been collected in manners consistent with good practice and that no obvious evidence of systematic or intentional bias exists in the data.
- 3.2.3.8 In conducting the CSAP work, the CSAP may seek clarification in writing regarding reports, plans, assessments or other documents prepared by others. These reports, plans and assessments may have been completed by a number of parties over a period of time. If the CSAP work determines that there are deficiencies that require additional sampling or other work, the CSAP should notify the Client, in writing, of the deficiencies.
- 3.2.3.9 If the CSAP identifies aspects of the CSAP work that differ from Ministry policy and guidance but in the judgment of the CSAP conform with the intent of the Act, Regulations, and protocols, the CSAP is encouraged to seek written confirmation of this from the Ministry prior to preparing a recommendation for an Instrument.
- 3.2.3.10 In conducting the CSAP work, the CSAP may delegate portions of the work to others, but only under the CSAP's Direct Supervision.
- 3.2.3.11 The CSAP is responsible for documenting the findings of the CSAP work in the Summary of Site Condition and providing recommendations for issuance of an Instrument to the Ministry Director.
- 3.2.3.12 If a CSAP resigns or is suspended or removed from a Parent Organization, he must immediately notify the Society in writing.

4.0 GUIDELINES FOR PROFESSIONAL PRACTICE

The services that CSAPs should consider as part of appropriate practice in carrying out CSAP work are outlined below. This outline is not intended to be exhaustive. Professional judgment is required in the provision of services.

4.1 General

The scope and complexity of CSAP work will vary depending on the site conditions, the type of Instrument being sought, and other factors. The CSAP work may involve the application of numerical standards, the application of risk-based standards/risk assessment, or both.

The type of review may also vary depending on the complexity of the site conditions and objectives of the Client. CSAP work may involve Self-Review or Arm's-Length Review. Self-review involves providing recommendations to the Ministry Director on sites where investigations, plans, assessments or other work to be reviewed has been performed by the Member engaged to perform the CSAP work or under the CSAP's Direct Supervision. Arm's-Length Review involves providing recommendations based on work by others not under the CSAP's Direct Supervision, which may include professionals in the same firm as the CSAP engaged for the CSAP work, or another firm.

4.1.1 Scope of Services

Before commencing the CSAP work, the CSAP shall communicate with the Client to:

- 4.1.1.1 Determine the terms of reference and scope of services for the CSAP work;
- 4.1.1.2 Disclose professional liability insurance coverage and reach agreement on fees, payment schedule and schedule for completing the CSAP work;
- 4.1.1.3 Inform the Client that other fees will be due and owing to the Society and/or the Ministry at the time of application for the Instrument; and,
- 4.1.1.4 Confirm with the Client that the CSAP may disagree with conclusions made in the investigations, plans and assessments to be reviewed based on requirements of the Act, Regulations, protocols or guidelines, policies and procedures of the Ministry and that this may necessitate additional work.
- 4.1.1.5 Inform the Client of the CSAP educational review and performance assessment processes and that submissions selected for these will result in delays in the issuance of the requested Instrument.

4.1.2 Role of Numerical Standards Approved Professionals and Risk Assessment Approved Professional

- 4.1.2.1 For CSAP work that involves the application of both numerical standards and risk-based standards/risk assessment, the CSAP work must be performed by one or more CSAP(s) in these categories.
- 4.1.2.2 CSAP work involving application of numerical standards must be prepared under the Direct Supervision and signed by a CSAP approved as a Numerical Standards Approved Professional and the work involving the application of risk assessment must be prepared under the Direct Supervision and signed by a CSAP approved as a Risk Assessment Approved Professional.
- 4.1.2.3 Where more than one CSAP is involved in the CSAP work, each CSAP must clearly document which portions of the work the CSAP is responsible for reviewing, complete the Summary of Site Condition forwarded to the Ministry Director, and clearly indicate which portions of the resulting recommendations the CSAP is responsible for.
- 4.1.2.4 If the scope of the CSAP work extends beyond the expertise of the CSAP(s), the appropriate professionals must be retained to provide the required expertise. This may be the case, for example, if the proposed Remediation Plan requires the services of geotechnical engineers, structural engineers or other professionals.

4.1.3 Determining Eligibility of Sites For Self-Review

In determining the eligibility of CSAP work for Self-Review, it is recognized that, in general, there will be a higher degree of objectivity when the CSAP work involves Arm's-Length Review. CSAPs may conduct Self-Review in accordance with the guidelines set out in Table 1 of the CSAP Society Rules document.

It is also recognized that there may be benefits to the limited early involvement of the CSAP providing Arm's-Length Review in the preparation stage of plans, assessments, and reports to be reviewed by the CSAP. Any involvement by the CSAP providing Arm's-Length Review prior to commencing CSAP work should be limited and should in no way obstruct the CSAPs objectivity. Under no circumstances should the CSAP conducting Arm's-Length Review perform any function of project management. While the CSAP may provide general advice, the CSAP should not outline or assign work or specific methods and procedures to be followed, or review or evaluate work for accuracy or adequacy prior to commencing CSAP work.

4.2 Objectives

The objectives of CSAP work are to:

- a) Confirm that the investigations, plans, assessments and reports documenting site conditions support the necessary conclusions for a recommendation for issuance of an Instrument;
- b) Document the findings of the CSAP review and provide a written recommendation to the Ministry Director concerning issuance of an Instrument including any conditions recommended to confirm that assumptions made in the investigations, plans and assessments remain valid.
- c) Prepare draft Instruments for review and issuance by the Ministry Director.
- d) Maintain a duty of care to the Ministry with respect to the CSAP work as identified in Section 3.2.3.

4.3 Relevant Legislation, Policy, Procedures, Protocols and Guidance

It is the responsibility of the CSAP to determine that conclusions made in the investigations, plans and assessments comply with the Act, Regulations, protocols, and relevant Ministry policies, guidelines and procedures that have been communicated to all practising CSAPs. In conducting the CSAP work, CSAPs must maintain a current knowledge of the Act, Regulations, protocols and relevant Ministry policy, procedures and guidance that have been communicated to all practicing CSAPs as well as relevant laws and guidelines of other agencies / jurisdictions (e.g., federal government, municipalities).

4.4 Technical Review – Standards Assessment Approved Professional

The scope of CSAP work for SAAPs for sites involving the application of numerical standards and/or screening level risk assessments will vary depending on the site conditions, the type of Instrument being sought and other factors. Additional guidance for CSAPs is provided in the appendices to these guidelines.

4.4.1 Scope

The scope of technical review by a CSAP Standards Assessment Approved Professional may involve review of:

- a) PSI reports (Stage 1 and Stage 2);
- b) DSI reports;
- c) Remediation Plans that do not involve a Detailed Risk Assessment;
- d) those parts of a Remediation Plan involving a Detailed Risk Assessment that pertain to the expertise of the SAAP;
- e) Confirmation of Remediation Reports; and,
- f) Contaminated Soil Relocation Agreements.

Reports such as Remediation Plans, Detailed Risk Assessments and Confirmation of Remediation Reports are developed from information contained in PSI and DSI reports. Items identified below in Section 4.4.2 also generally apply to review of Remediation Plans, Detailed Risk Assessments and Confirmation of Remediation Reports.

4.4.2 PSI and DSI Reports

In reviewing a PSI report or a DSI report, the CSAP must consider whether the following questions have been answered, adequately interpreted, and whether this information is included in the report.

- a) Is the scope of the PSI adequate to identify all likely areas of potential environmental concern (APECs) and potential contaminants of concern (PCOCs)?
- b) Are all test pit, borehole and monitoring well records included?
- c) Are records of all analytical testing included?
- d) Are results from a recent search of the Site Registry included and are the search results adequately interpreted?
- e) Are all test holes and sampling locations clearly shown on scaled drawings?
- f) Are the analytical data reliable?
- g) Are all APECs assessed adequately for all associated PCOCs?
- h) Is interpretation of site-specific factors for substances listed in CSR Schedule 5 adequate and have the correct CSR numerical standards been used that apply to current and future use of land, water, sediment and air (as applicable) at the site?
- i) Are all areas of environmental concern (AECs) identified and adequately delineated for all associated contaminants of concern (COCs)?

- j) Have notifications been made to the Ministry and neighbouring landowners if off-site or potential off-site migration of contamination has been identified?
- k) Is the report free of statements of limitation that preclude the CSAP or the Ministry Director from relying on the work?
- l) Where previous work has been conducted, has it been adequately consolidated and synthesized, and does the report clearly indicate which information has been relied on in developing the conclusions?
- m) Are the report conclusions clear and unambiguous and supported by the investigation results?
- n) Are key assumptions on which the report conclusions are based and are levels of uncertainty associated with the conclusions identified to assist the CSAP evaluate the degree of confidence associated with the conclusions?
- o) Are the report recommendations supported by the findings of the investigations and are the investigations complete?

If the CSAP determines that assessment of all relevant information has not been undertaken, the CSAP is encouraged to request clarification from the report authors or request that the required information be provided before the CSAP review is completed and a recommendation for an Instrument is made.

Prior to review of a Remediation Plan, Confirmation of Remediation Report or an application for a Contaminated Soil Relocation Agreement, the CSAP must confirm that conclusions developed from PSIs or DSIs are sound. The CSAP must not provide a recommendation to the Ministry Director for an Instrument if there are technical deficiencies associated with the PSI or DSI (for example, use of incorrect standards, or inadequate testing for all PCOCs at an APEC).

4.4.3 Remediation Plans

In reviewing a Remediation Plan, the CSAP must consider whether the following questions have been answered, adequately interpreted, and whether the information is included in the reports:

- a) Has the site investigation provided all information required to develop a Remediation Plan?
- b) Does the Remediation Plan generally follow the framework listed in CSR Part 1?

- c) If the Remediation Plan is implemented, is there a high probability that the applicable CSR remediation standards will be met for all COCs and AECs within the time frame specified in a CSR protocol?
- d) If the Remediation Plan pertains to off-site lands, have the affected off-site parties been consulted and have they provided their written agreement for proceeding with the proposed Remediation Plan for offsite lands?
- e) If the Remediation Plan involves a Detailed Risk Assessment, has the supporting risk assessment received sign-off by the CSAP Risk Assessment Approved Professional?
- f) Does the Remediation Plan address all ongoing treatment/monitoring requirements, and are they adequate?
- g) Does the Remediation Plan area address the full extent of contamination and conform to requirements of protocols and Ministry policies in regard to determining the boundaries of a site?

If the CSAP determines that there is either insufficient or inappropriate information supporting the Remediation Plan, the CSAP must request clarification from the report authors or require that the appropriate assessments are carried out.

4.4.4 Confirmation of Remediation Reports

In reviewing a Confirmation of Remediation Report, the CSAP must consider whether the following questions have been answered, adequately interpreted, and whether the information is included in the report:

- a) Have post-remediation confirmatory samples for soil and air been analysed for all COCs that apply to each AEC?
- b) Is the confirmatory sampling adequate to determine that all AECs have been remediated for all COCs?
- c) Do results of post-remediation groundwater monitoring confirm that all AECs have been remediated with respect to all COCs?
- d) Are the analytical data reliable and have all analytical data been included with the report?
- e) Are confirmatory sample locations clearly shown on scaled drawing(s)?
- f) Has imported fill quality been confirmed to be acceptable for use at the site?

- g) If required, has a notice of independent remediation been provided to the Ministry within 3 days of the start of remediation?
- h) If required, has notice of completing independent remediation been provided to the Ministry within 90 days of completing remediation?
- i) If required, has a notice of off-site migration of contamination been provided to the Ministry and neighbouring landowners affected by off-site migration of contaminants?
- j) “If hazardous waste, as defined by the HWR, was transported from the site, was the hazardous waste registered, a Provincial ID number obtained, distributed and were completed waste manifests in accordance with the manifest distribution instructions?”

4.4.5 Contaminated Soil Relocation Agreements

In reviewing an application for a Contaminated Soil Relocation Agreement (CSRA) the CSAP must consider whether the following have been adequately addressed:

- a) Has the proponent reviewed conditions of the Regulations and, if necessary, receiving-site permits or exemptions provided by the CSR to confirm that the CSRA is necessary?
- b) Has the source site been recently and adequately characterized in general accordance with the CSR?
- c) Is the soil to be relocated characterized in general accordance with methods acceptable to the Ministry and has its quality been assessed with reference to appropriate CSR standards?
- d) Is pH of soil at the source and receiving sites adequately characterized in general accordance with Ministry guidance?
- e) Does the soil to be relocated meet the applicable CSR standards for the receiving site?
- f) Is appropriate documentation included (for example, land title search) to confirm that owners of the source and receiving sites have been properly identified?
- g) Is a completed CSR Schedule 8 included with the application for a CSRA?
- h) For transfer of contaminated soils to landfills requiring a CSRA, are copies of relevant landfill permit conditions included with the application?

4.5 Technical Review – Risk Assessment Approved Professional

CSAP work by the RAAP involves review of Detailed Risk Assessments performed for Eligible Sites as defined in a Protocol established by the Ministry.

4.5.1 Scope

The scope of technical review by a CSAP RAAP may involve review of:

- a) human health risk assessment reports;
- b) ecological risk assessment reports;
- c) parts of a Remediation Plan involving a risk assessment that pertain to the expertise of the RAAP; or
- d) parts of a CSRA involving a risk assessment that pertain to the expertise of RAAP.

4.5.2 Risk Assessment Reports

The first step in CSAP review of a risk assessment report is to confirm that it is eligible for CSAP review. Guidance for this determination is provided in a protocol established by the Ministry.

Assuming the report(s) are eligible for CSAP review, when reviewing the risk assessment report, the RAAP must consider applicability of the following:

- a) Has the site investigation report(s) upon which the DRA is based received sign off by a CSAP Standards Assessment Approved Professional?
- b) If the DRA pertains to offsite properties, has the offsite property owner(s) agreed in writing to the risk-based approach?
- c) Does the DRA follow required Ministry protocols and guidance relating to the performance of DRAs?
- d) Does the DRA follow generally accepted frameworks for risk assessments?
- e) Are all DRA framework components (for example, problem formulation/conceptual site model, exposure assessment, effects/toxicity assessment and risk characterization) present and defensible?
- f) Are the tools used within each component of the DRA appropriate for the nature of the site and level of investigation?

- g) Are the study design and methods used appropriate?
- h) Are the results (i.e., exposure and effects/toxicity assessments) presented clearly and appropriately?
- i) Has the existence or absence of each stressor-pathway-receptor combination been adequately assessed? If so, has each pathway been followed throughout the DRA?
- j) If the DRA has been tailored to meet specific objectives (for example, post-remediation predictions, or a higher tier of RA following up on a screening level assessment), is the approach sound and appropriate?

Additional guidance for RAAPs is provided in Appendix F of these guidelines.

4.6 Reporting and Documentation

4.6.1 Summary of Site Condition

A satisfactorily completed Summary of Site Condition (SoSC) must be submitted with the application to the Ministry and must be signed by the CSAP(s).

4.6.2 Draft Instruments

In preparing a draft Instrument for Ministry issuance, the CSAP must determine if the following are appropriately addressed:

- a) Are all reports used to develop the recommendation listed on the Instrument?
- b) Are the applicable CSR standards correctly identified?
- c) Are the substances for which the site has been remediated listed correctly and completely?
- d) Are conditions listed in the Instrument schedules necessary, sufficient and appropriate?
- e) For Preliminary and Final Determinations of Status, have all parties with a registered interest in the subject lands been identified for their receipt of the Instruments?

4.6.4 Record Keeping and Files

Following completion of the CSAP work, the CSAP must initial and date copies of all reports reviewed. These reports must be included with the CSAP submission for inclusion in Ministry files and referencing in the Site Registry.

CSAPs must retain complete copies of their review files for a minimum of 10 years.