



CSAP Society
Professional Development Workshop
Q & A Series - April 29, 2008

Q&A Topic: Performance Assessments

Q: Does the PAC member have to be one in good standing with CSAP?

A: A member of the PAC could be someone who is not an approved professional. However, any member who is an approved professional would have to be a member in good standing of CSAP.

Q: Are the performance assessments findings going to be sent to the Ministry?

A: At this point the plan is only to send the findings if there is some sort of disciplinary action, the assessment is brought to the attention of the ministry. There will only be 2 categories of assessments: sufficient, or not sufficient. If it's not sufficient, it will be brought to the Ministry's attention. The information is available on file if someone wants to view it.

Q: Where will these files be stored?

A: at CSAP's office

Q: What is the timeline on delivery of results of performance assessments?

A: You're looking at about a month right now.

Q: If a submission is not selected for review, what's the waiting period for the initial screening?

A: Four days if it's not selected for performance assessment. After the ministry receives the submission from CSAP, the timeline is 10 days.

Q: If an audit is performed and it's okay, the only thing that goes to the ministry is a letter stating the submission has been audited. Why does it go to the ministry if it's deficient? What is the ministry going to do with the information?

A: The ministry has information about the quality reviews and in the future it still may be useful for the ministry to know why the submission was deficient. The reason is so that the ministry can get feedback on the main issues as to why it was deficient, and to develop policy. It's a matter of sharing information. But CSAP will discuss this with MOE and determine if this is necessary.

Topic: Summary of Site Conditions

Q: Example: A site in an area with general fill. There is no responsibility of that fill by the site owner. By signing Part 8 of the SoSC there is a concern that the owner is taking on some liability on that fill. What kind of responsibility does the owner take on for contamination that is not on their site?

A: MOE Comment: If it hasn't migrated to the site, you're not responsible. By signing that statement (Part 8), the owner is still not taking on any liability. Notify the neighbors of the fill so they are aware.

Q: Issue with electronic signatures on SoSC being made to the public.

A: The Ministry is looking for a .pdf copy of the SoSC as well as a hard copy with the signature on it. The public doesn't need to see the signature, only the ministry. Concerns about someone "lifting" a signature was raised. APEGBC is working on issue of secure signatures.

Q: If engineering works are proposed for risk management, then drawings have to be signed by P.Eng. (who does not need to be an AP).

Topic: Common Submission Deficiencies

Comment, Reidar Zapf-Gilje: Deficiencies can be improved by providing education for APs, more workshops.

Comment, MOE: Disagreement on this. APs typically explain their rationale for making 'mistakes' on their submissions. In other words, it's not that they don't know the 'rules', they are using their own professional judgment that may not coincide with the ministry's. It's not a matter of providing more education.

Q: Chloroform in Soil Vapour beneath City Road next to Remedial Excavation.

A: Use risk assessment approach when only dealing with Vapour.

Q: Contamination migrating onsite. How to obtain COC if neighbor refuses access?

A: no point in excavating it out if it's not originating from the property.

A: goal is to *prevent* contamination migrating onto your site.

A: Technical guidance document would be helpful with the example that M Macfarlane gave (illustration).

Q: Iron in Groundwater for sites where DW does not apply.

A: MOE comment: A CoC can be issued, separately from federal requirements related to Fisheries act and surface water criteria.

Q: What happens in the case of a certificate with 2 land uses?

A: According to the ministry, a certificate can only be a single land use. Two land uses can be done through metes and bounds, on one certificate.

Q: What about a property where the planning isn't finished yet?

Topic: Sediments are not always investigated when site is adjacent to a water course.

Q: Are APs to test sediment in ditches? All groundwater goes to ditches in Richmond. When is a ditch a ditch, when is it more than a ditch?

Comment: In Richmond, for example, there is habitat some of the ditches.

Comment: We need a definition. Protocol 6 defines habitat.

A: MOE comment: If there is a ditch that's established habitat and it's developed, then you have aquatic life standards. If it's maintained as a drainage ditch, even if there are fish in it, it's a ditch.

Comment: There are maps for where there is valuable habitat in Richmond ditches. A professional biologist should be assessing the ditch to establish whether it represent habitat or is mainly a drainage feature.

Q: Parts of legal parcels should not be considered, except in very rare situations, or in the case of offsite migration.

A: An instrument can be issued for a portion of a site.

Q: Do you have to look at all APECs for a portion of a site that has been impacted by off-site migration?

A: The ministry will issue certificates for contaminates you are aware of/responsible for. One can get a certificate for only hydrocarbons, and not metals, for example. Site boundary procedures document is coming out from the Ministry that will cover a lot of these issues.

Topic: Water use standards

Q: If a certificate was issued on the basis of no water use standards, and 5 yrs later, they see aquatic life standards *should* have applied, what does the AP do? Notify the ministry? It's not necessarily an error. As we acquire new information, we see that the old information was wrong.

A: Audience Comment: APs should notify the ministry if they become aware of contamination on their site's neighbouring properties. This may be a non issue with new ministry protocols/procedures?

A: Ministry comment: don't need to look at neighboring sites, only yours. It's whatever is applicable *now*, not in the future, not in the past.

Send questions and comments to info@csapsociety.bc.ca and copy the Ministry.

Consensus on frequency of workshops: once every six months at a minimum.