

## Procedure 9: Procedures for Processing Site Profiles

Stakeholder	Document Section(s)	Issue	Stakeholder Comments / Recommendations	Ministry Response(s)
Canadian Fuels	General	Bullet 1 wording	Change the work “fax” to “send” or “transmit”	The wording will be amended to “send” in order to include other forms of communication such as email.
SLR Consulting (Canada) Ltd. (Michael Sloan)	Section 3.3.2	Site investigation requirements	In this document, a detailed site investigation (DSI) is required if a NIR, NOM or AIP has been submitted; based on the premise that contamination is present. However, a DSI will have been completed prior to an AIP application. We suggest removing the requirement for again requiring a DSI if an AIP application has been submitted, as there should be one on file with MOE. Requesting an update on the status of remediation would be more appropriate in this case.	According to the legislation, when a Director received a site profile, he/she must determine if site investigation is required or not. This is the mechanism for “freezing” local government authorizations. The Director does not have the legal authority to require an “update”. If the DSI is already complete at the time of the site profile decision, a release would relatively simple to obtain. Until a legal ministry instrument is obtained, the DSI is not considered “complete”. In order to streamline the process as much as possible within the existing legislation, this approach is necessary.
Canadian Fuels (Rob Hoffman)	4.2.2 Scenario 2	Title – With or Without a proposed change in site activity	This comment is confusing, does this mean applicable in all situations?	Yes, scenario 2 is applicable in many different situations, regardless of whether there is a planned change in land use or if the land use will remain the same.
	4.2.3 Scenario 4 and 5	Contamination has not been identified to date but there is “potential” for contamination to exist at the parcel	This section seems unnecessary and speculative	The release mechanism for Scenario 4 and 5 is based on “receipt and acceptance of independent remediation”. If no contamination exists at the property, then a person cannot obtain a release under these scenarios unless there is still a chance that contamination could be encountered (e.g. Under an existing building or area not previously investigated). If there is no potential for contamination, then the proponent must obtain a Determination that the site is not contaminated.

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Canadian Fuels (Rob Hoffman)	4.2.3 Scenario 4 and 5	Requirements imposed by Director	"Remediation must be completed within 5 years". This is inconsistent with "remediation plan" as defined in Procedure 8, which does not specify completion in 5 years.	This procedure applies to non-high risk sites. The requirement for remediation within 5 years is consistent with the requirement to complete remediation in relation to an Approval in Principle issued under Protocol 6.