



## Site Risk Classification Update

On June 1, 2010, the Land Remediation Section’s new site risk classification protocol came into effect under the *Environmental Management Act*. This marked an important milestone in the ministry’s contaminated sites legal regime.

### How was it implemented?

The ministry has been using [Protocol 12, “Site Risk Classification, Reclassification and Reporting”](#), as an administrative tool to classify a site’s risk to human health and the environment. Protocol 12 identifies six triggers used to require the submission of a Site Risk Classification Report (SRCR). Information found in the SRCR is directly used to classify site risk. For an overview of the site risk classification process, please refer to [Fact Sheet 45, “Site Risk Classification”](#).

### Are there any exemptions from having to provide a Site Risk Classification Report?

Yes. In the [Q&As section](#) of our Land Remediation Section’s website, the ministry has provided details on circumstances where the submission of a SRCR is not required. These exemptions will be incorporated into Protocol 12 during a round of revisions expected in 2011.

### Protocol 12 submission statistics

156 sites were classified under Protocol 12 from June 1, 2010 through November 30, 2010. 11 (7%) were high risk sites, 131 (84%) were non-high risk sites and the remaining 14 (9%) were pending classification.

Those pending classification were either required to submit a schedule for completion of a site investigation to support site risk classification or indicated that the remediation of high risk site conditions under independent remediation would be completed in less than 90 days. The following table shows the breakdown of SRCR submissions for each of the six triggers.

SRCR Submission Trigger	Number	Percentage of Total
Notification of Independent Remediation	112	72%
Notification of Offsite Migration	17	11%
Submission of investigation report required by director		
Contaminated Sites Service Application	26	17%
SRCR required by a director	1	<1%
High risk conditions at a neighbouring parcel		

### High risk sites

Of the 11 sites classified as high risk, five had upper cap concentration exceedances and complete exposure pathways, four had mobile nonaqueous phase liquids and two had both of these high risk site conditions.

Commercial and industrial uses associated with the high risk site conditions include petroleum operations (3 sites), dry cleaning operations (2 sites), shooting ranges (2 sites), shipyards (1 site), mining (1 site), suspected spillage (1 site), and mixed commercial and industrial operations (1 site).

The ministry has undertaken varying degrees of involvement in the 11 sites classified as high risk. Most are now being investigated or remediated under the oversight of qualified or Approved Professionals.

### **Are Site Risk Classification Report submissions audited?**

Yes. The ministry has established an auditing process for Protocol 12 where one in twenty site risk classification submissions is selected by the ministry for further review.

Clients are informed of the selection of their site for an audit by letter issued by the ministry. Our expectations are that a client will submit all relevant information (including figures and analytical data) used to classify a site's risk. Applicants are given 30 days to submit the site investigation information.

Site risk classification submissions are selected randomly for auditing, irrespective of the trigger, site owner, consultant and the site risk classification. One exception is that SRCRs submitted with contaminated sites services applications are not selected for audit since these submissions normally include site investigation reports which are reviewed in detail by the ministry or have already been audited by the CSAP Society.

There are three outcomes of an audit, based on a site risk classification review. The ministry

- agrees with the client's classification. No follow up would be required.
- determines that further investigation is required to classify the site risk. Submission of an investigation schedule would be required.

- determines that the site risk has been incorrectly classified. Depending on the reclassification the ministry may require a schedule for further investigation, a summary of remedial methods, etc.

### **What are some common mistakes?**

The ministry has observed some common mistakes with SRCR and the Exposure Pathway Questionnaire (EPQ) submissions.

#### **Site Risk Classification Report mistakes**

- A SRCR is not submitted as required when triggered under Protocol 12.
- If site investigation information is insufficient to determine site risk, in Part 3 of the form, dates are not provided for the completion of site investigations and submission of a revised SRCR.
- A separate SRCR is not submitted for an offsite parcel likely or known to be high risk.
- The "Signatures" section (Part 6 of the form) is not filled out completely – it requires two signatures, a printed name and date.

#### **Exposure Pathway Questionnaire mistakes**

- An EPQ is not submitted as required for a site with upper cap concentration exceedances (whether or not the site is classified as high risk).
- A separate EPQ is not submitted for each onsite and offsite parcel with upper cap concentration exceedances.
- When the first question in a subsection of the EPQ for a particular exposure pathway is answered "no" (e.g., human health water exposure) the subsequent questions under that exposure pathway may be answered, even though responses are not required.

## **Responses to common questions on Protocol 12**

### **Question 1**

Do I need to investigate my entire site in order to classify site risk under Protocol 12?

No. Section 5.7 of Protocol 12 states that a SRCR “must indicate the presence of all parts of the site that are known to be high risk and provide a general schedule for remediating all high risk parts of the site.” If remediation is done on a part of a site and there are no likely or known high risk conditions elsewhere at the site, then a SRCR can be completed based on the information for the part of the site.

### **Question 2**

Must I investigate all environmental media in order to classify site risk under Protocol 12?

No. If based on available site information and in the opinion of a qualified professional the SRCR can be completed satisfactorily in the absence of investigations of one or more environmental media, the SRCR may be submitted to the ministry. However, rationale must be provided to clearly support and document the determination that there are no upper cap concentrations exceedances in the media lacking data.

### **Question 3**

Do I need to completely remediate a site in order to reclassify it under Protocol 12?

No. A site owner can request reclassification of his or her site after the removal of high risk conditions. Remediation of all contamination is not required.

*Note: This summary is solely for the convenience of the reader. The current legislation and regulations should be consulted for complete information.*

*For more information on Protocol 12, contact the Environmental Management Branch at [siteclassification@gov.bc.ca](mailto:siteclassification@gov.bc.ca).*