

LAND REMEDIATION SECTION OMNIBUS UPDATE

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CARO Technical Seminar
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Ministry of
Environment

OMNIBUS – COMMENT SUMMARY

- public comment period for Omnibus Discussion Documents (Proposal Papers) closed August 28, 2015
- ~300 comments received from:

BCBC	BCELTAC	BC MoH	CAPP	CARO
CFA	City of Surrey	City of Vancouver	CSAP	DFO
Environment Canada	Health Canada	Metro Vancouver	OGC	SABCS
SNC Lavalin	Synergy Aspen	TECK	UDI	etc.

OMNIBUS – ENDORSED ELEMENTS

Unanimous support for:

- ongoing fixed cycle of standards updating
- new High Density Residential Land Use standards
- new Parkade Vapour standards

OMNIBUS – ENDORSED ELEMENTS

Strong support for:

- converting aesthetic-based DW to new toxicologically-based DW standards
- new Sch X (soil) and Sch W (water) formats
- WL modified regression derivation method
- deferring updating of IW and LW standards to next cycle
- deferring updating of sediment standards to next cycle
- eliminating Sch 7 CSRA standards/use all CSR standards to determine need for CSRA
- updating the Sch 10 Soil and DW standards

OMNIBUS - CONCERNS

- opportunity for further consultation on actual calculated standards
- will analytical methods (for emerging toxicants) be available
- will Background and Detection Limits checks be retained
- must have a “grandfathering period” re: Stage 10 implementation
- consistency between Health Canada DW (tox-based) guidelines and new CSR updated DW (tox-based) standards
- want to see/review the Emerging Toxicants list
- want to see/review the TRV list
- hierarchy of TRV sources
- transparency/documentation of new derived standards
- will Clinical Adjustment Factors be retained for arsenic, cadmium, and lead

OMNIBUS – CONCERNS (CONTINUED)

- GW model and soil to GW to protect DW standards – too conservative
- ETs for human health standards – too conservative
- scope and timing of Consequential Amendments to HWR and OMRR
- Controversy re: possible adoption of CCME PHC analytical methodology, derivation approach and guidelines versus retaining the existing BC PHC analytical methodology, derivation approach and standards
- Concern with enforcement of HDR prohibitions (e.g. no playgrounds and 3 story rule)

OMNIBUS – CONCERNS (CONTINUED)

Concerns for new WL standards:

- EC₁₅ level of protection - too conservative
- combined lethal and non-lethal ECx data to set WL standards
- will increase cost of site assessment and remediation
- little support for human health WL vapour standards
- need for more clarity re: application of WL vs. Urban Park standards in cities

OMNIBUS – BCELTAAC COMMENTS

- request for advance notification to ensure analytical methods, DLs available
 - Draft standards will be provided to (BCELTAAC) in advance
- units for soil standards as $\mu\text{g/g}$ (or mg/kg) based on dry weight
 - Agreed, footnote 1 of Sch X will state "All values $\mu\text{g/g}$ dry weight unless otherwise stated...."
- Continue with Use of BC Hydrocarbon Parameter Regime within CSR
 - As stakeholder advice received to date regarding the ministry's current approach to PHCs and the CCME approach to PHCs is both contentious and contradictory, the ministry has decided to defer the issue of updating PHC standards to the next cycle of review

OMNIBUS – BCELTAAC COMMENTS (CONTINUED)

- update and define Dioxin TEF Calculations in Schedule 5
 - Agreed, dioxan/furan TEFs will be updated and used to calculate new soil standards for dioxin and dioxin-equivalent coplanar PCBs
- define “DDT and DDT Metabolites” in Schedules 5 and 6
 - Agreed, isotopes comprising DDT and DDT metabolites will be specified in the new schedules
- clarify Units for Ammonia Standards in Schedule 6
 - Agreed, the water standards for ammonia will be specified "as N"
- Emerging Toxicants – Nanomaterials
 - Agreed, but CSR standards for nanomaterials will not be included in the Stage 10 amendment

OMNIBUS – BCELTAC COMMENTS (CONTINUED)

- Emerging Toxicants – Alkylated PAHs, advise against deriving a standard for alkylated PAHs (total)
 - Agreed, the intent is to establish water standards for discrete alkylated PAHs if possible within the time and resource constraints of the Stage 10 amendment. The ministry will not set water standards for "total" alkylated PAHs.
- Remove Total PAH in sediment criteria as they are not tox-based
 - Agreed. This is a priority item for a future cycle of revisions.
- Define Requirement for Hardness Calculation (Dissolved vs Total)
 - The ministry has decided to defer this issue until the Environmental Sustainability and Strategic Policy Division has developed a WQG for hardness

OMNIBUS – BCELTAAC COMMENTS (CONTINUED)

- address Issues with Schedule 4/5 Standards for Peat Soils / Wetlands
 - Agreed, it is hoped that wetlands standards for salt (from the CAPP sponsored research) will be available to include Stage 10 amendment but the broader issue of wetlands standards will have to be held over for the next cycle of standards updating.

WHAT STILL NEEDS TO BE DONE?

- finish and post “Final” Protocol Papers
- complete calculation of draft standards
- complete BCELTAC “DL check”
- do facilitated final consultation on Protocol Papers
- complete Consequential Amendments for HWR & OMRR
- complete revisions to P11 Upper Caps
- complete work on MO package for Stage 10 Amendment

OMNIBUS – NEXT STEPS

- response to Comments finalized – mid-October
- final Protocol Papers – end of November
- FN Consultation – end of November
- “number crunching” – mid-October to mid-December

STAY TUNED!

QUESTIONS ?

Schedule 4 – Lizzy Mos

Schedule 5 Human Health Matrix Standards – Lizzy Mos

Schedule 5 Environmental Health Standards – Remi Odense

Schedule 6 Standards – Heather Osachoff

Schedule 9 Standards – Lizzy Mos

Schedule 10 Soil Standards – Aimée Brisebois

Schedule 10 Drinking Water Standards – Heather Osachoff

Schedule 11 Standards – Peter Kickham

Soil to groundwater matrix standards – George Szefer

P2 Leachate tests – George Szefer

P2 soil types – George Szefer

Emerging Toxicants – Heather Osachoff

TRVs– Heather Osachoff

OMRR Amendments – Lizzy Mos

HDR Standards – Peter Kickham