

# Protocol 12 – High Risk Classification, Reclassification and Reporting

*GeoEnviroLogic Professional  
Development*

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# Protocol 12

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## *Overview*

- Protocol 12 refresher
- Submission statistics
- Common mistakes and misconceptions
- Audit process
- Site risk reclassification
- What's next for Protocol 12?

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## *In case you forgot...*

- Protocol 12 – Site Risk Classification, Reclassification and Reporting
  - Ministry mandate to regulate all contaminated sites and focus on the remediation of high risk sites
  - Six administrative triggers are used to require the submission of a Site Risk Classification Report (SRCR)
  - Information found in SRCR is used to classify site risk (high risk, non-high risk, pending classification)

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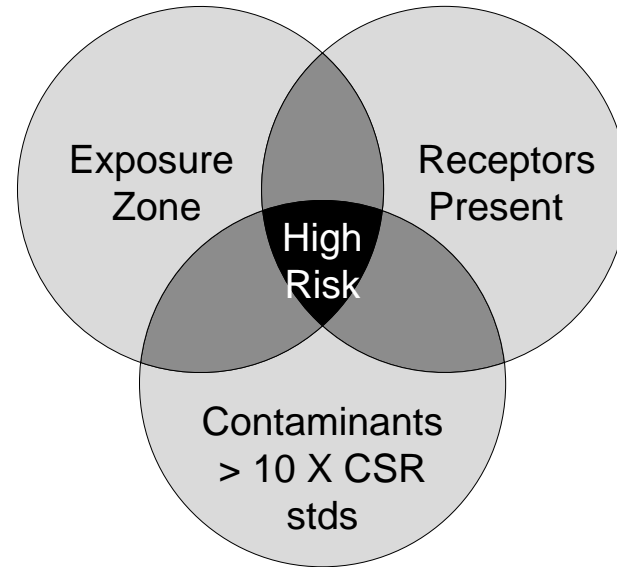
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## Condition #1



Mobile non-aqueous phase liquid  
(NAPL)

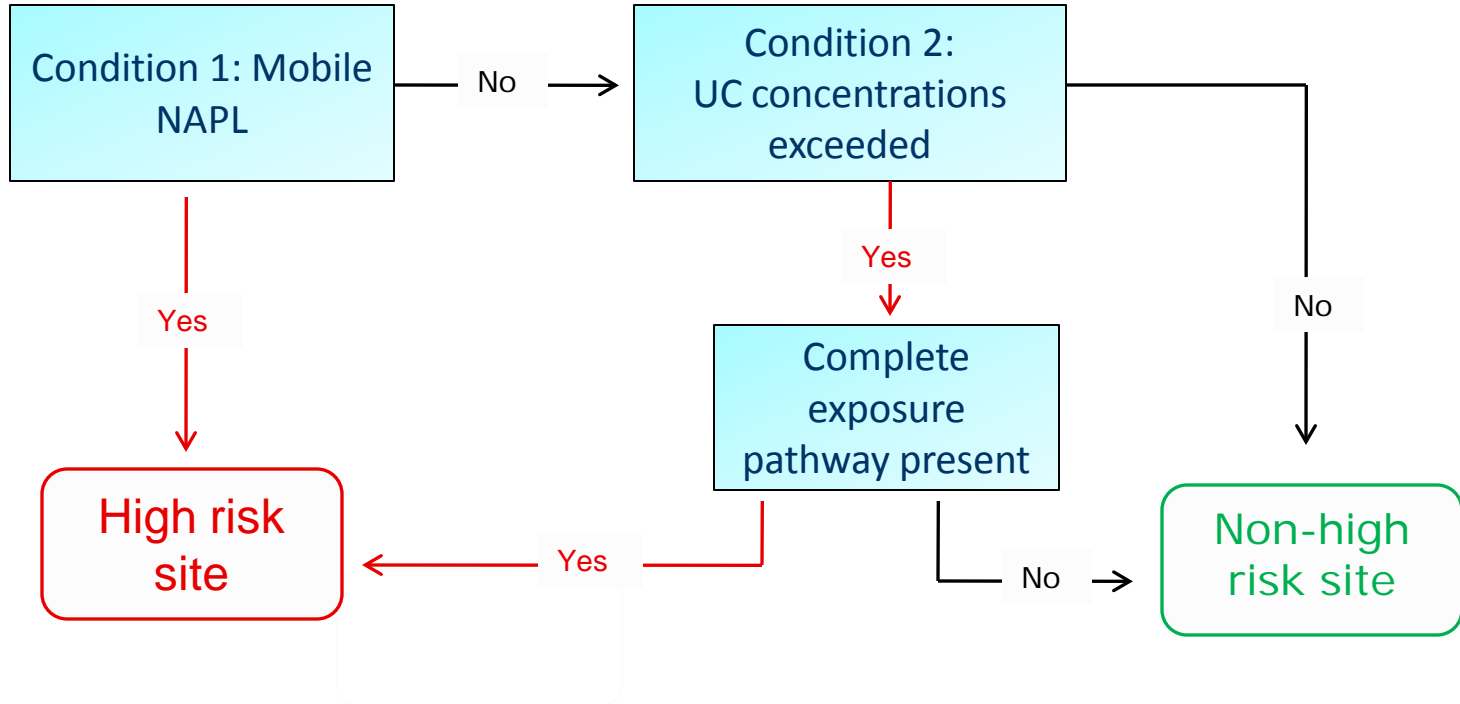
## Condition #2



Upper cap contaminant concentrations  
AND exposure pathway

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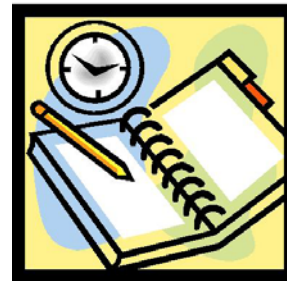
- Protocol 16 – Identifying mobile NAPL
- Protocol 11 – Upper cap concentrations



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- Site Risk Classification Pending....
  - Further investigation is required to classify a site under Protocol 12
    - Offsite migration of contamination
    - Soil vapour investigation required
    - Other areas onsite require investigation to determine site risk
  - Schedule for further investigation and submission of revised Site Risk Classification Report required



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## ***Protocol 12 Statistics:***

- Initial estimate was that 10% of sites classified would be high risk
- To date (up to January 27<sup>th</sup>, 2011):
  - 217 sites have been classified
    - 14 are high risk
    - 189 are non-high risk
    - 14 are pending classification
  - ~65% of submissions triggered by NIR
  - ~34% triggered by NOM or CSSA
  - ~1% other triggers

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## *Common mistakes or misconceptions:*



- SRCR not being submitted when required
  - Issuance of non-compliance letters

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## ***Common mistakes or misconceptions:***

- Site investigation schedule not provided if information is insufficient to classify site
  - Should include schedule for submission of revised SRCR
- All media and entire site does not necessarily need to be investigated in order to classify the site (Section 5.7 and FAQs)
  - Classification should be based on all site information obtained during investigation/remediation to date

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## *Auditing Process*

- 1 in 20 site risk classifications are subject to a random ministry audit
  - Applicants are informed via a form letter



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- All information used to classify the site risk is submitted to the ministry for review
- Ministry reviewer confirms that site information is sufficient to classify the site and that the site has been classified correctly
- Outcome letter is issued to applicant
  - 3 anticipated decisions

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## ***Site Reclassification***

- Section 6.0
  - A person can apply to have a site reclassified as a non-high risk or risk managed high risk site
  - A site can be reclassified at any time after high risk conditions have been removed or addressed
  - Reclassification reporting requirements:
    - Revised Site Risk Classification Report
    - Summary of Site Condition (if high risk remediation >90 days)
    - Approved Professional signoff of the above

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## ***Site Reclassification***

- Additional information may be required by the Director in certain site circumstances
- Can reclassify parts of sites, however the entire site can only be reclassified where all high risk conditions have been remediated

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## *What's next for Protocol 12?*

- Amendments are scheduled for early 2011
  - Proposed changes include:
    - Adding exemptions provided in FAQ section
      - Negative determinations, numerical CoC applications, reportable spills, residential UST sites, soil quantity
    - Edits to SRCR and Exposure Pathway Questionnaire forms

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## *Resources*

- Site risk classification key topic section
  - Administrative Guidance 10
  - Fact Sheet 45
- Site risk classification FAQs
- Questions can be emailed to [siteclassification@gov.bc.ca](mailto:siteclassification@gov.bc.ca)

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*Any Questions?*

