

Strategy for Managing Monitoring Reports

The Ministry of Environment may require that monitoring reports for contaminated sites be submitted for several reasons:

- to satisfy conditions in contaminated sites legal instruments such as Approvals in Principle, Certificates of Compliance and Orders;
- to meet requirements imposed for independent remediation; or
- to satisfy conditions in waste discharge permits under the *Environmental Management Act*.

To facilitate compliance activities and reduce the need for ministry staff involvement with non-high risk sites, we have developed a strategy to streamline monitoring report management.

What are the strategy's key components?

The strategy has three main components. It:

- adjusts the manner and frequency of reporting by level of risk;
- requires, in some cases, the submission of an Approved Professional statement, or both an Approved Professional statement and a report signed and sealed by an Approved Professional; and
- uses the Site Registry, in conjunction with ministry compliance monitoring, to determine whether Approved Professional statements and reports have been submitted as required.

What must the Approved Professional statement and report include?

The content of the Approved Professional statement and report will vary according to the type of legal instrument and remediation approach used. In all cases, however, the statement should confirm whether the conditions and requirements in an instrument had been met during the reporting period.

In addition to the Approved Professional statement, a report signed and sealed by an Approved Professional may be required to include:

- an interpretation of current and cumulative monitoring results;
- a summary of remedial activities undertaken;
- an assessment of overall remediation progress;
- a summary of inspection and maintenance of treatment and/or risk management works;
- an evaluation of treatment system and/or risk management works performance; and
- supporting documentation such as laboratory reports, figures, tables, and records of monitoring, inspection and maintenance of works.

What are the reporting requirements?

Regardless of the level of site risk, the Director of Waste Management must be promptly notified in writing by the responsible person if:

- discharge limits or other requirements in a waste discharge authorization are not being met;
- substantial changes to an approved remediation plan are intended; or
- there is a change in the conditions or circumstances described in a risk assessment that could invalidate the assessments.

When site monitoring objectives have been achieved or changes to monitoring requirements imposed by the ministry are desired, Approved Professionals may recommend that the Director issue a revised Approval in Principle, Certificate of Compliance or other instrument.

Reporting requirements for non-high risk sites

For lower risk sites and low risk situations associated with waste discharge permits or Director’s requirements under independent remediation, neither an Approved Professional statement nor a report needs to be submitted – unless required by the Director. If the latter is the case, then such reporting would normally be in conjunction with periodic compliance checking activities conducted by the ministry. Records of monitoring, inspections and maintenance of works would also need to be kept.

Reporting requirements for Approvals in Principle and Certificates of Compliance for non-high risk sites include periodic submissions

of an Approved Professional’s statement. Records also need to be kept and a report submitted if requested by the Director. In that event, ministry review fees apply and the submission must be accompanied by a [Contaminated Sites Services Application form](#).

Reporting requirements for high risk sites

For high risk sites and situations, the reporting requirements include submission of an Approved Professional’s statement, along with a report. For example, a high risk situation may involve use of an unproven treatment technology where there is potential for adverse human health or environmental effects should the treatment system not perform as predicted. The frequency of reporting depends on site conditions.

Reports submitted to satisfy conditions in legal instruments for high risk contaminated sites are normally subject to a ministry review fee. In such a case, a [Contaminated Sites Services Application form](#) must accompany the submission.

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, contact the Environmental Management Branch at site@gov.bc.ca.