

Fiddler, Rob GCPE:EX

From: Roome, Robyn ENV:EX
Sent: Wednesday, October 2, 2013 5:04 PM
To: 'Wayne Smook'
Cc: McGuire, Jennifer ENV:EX; McCandlish, Brad ENV:EX
Subject: Finalized Environmental Monitoring Plans: Water and Sediment Quality and Biological Programs

Hi Wayne,

Thank you for submitting the September 30, 2013 Environmental Monitoring Plans: Water and Sediment Quality and Biological Programs for the Lemon Creek Jet-A1 fuel spill incident of July 26, 2013. The BC Ministry of Environment is prepared to consider the Environmental Monitoring Plans finalized, however please note the following:

Water and Sediment Quality

Section 4.2.2.2 Data Collection and Regulatory Standards/Guidelines:

- Please include total organic carbon analysis to all sediment chemistry samples earmarked for hydrocarbon analyses, so that differences in sediment characteristics can be incorporated into the sediment chemistry assessment.

Section 4.2.3 Porewater Quality:

- Sampling porewater has been proposed for assessment of interstitial groundwater quality and the potential for contaminated sediments to act as a source of groundwater contamination. If use of porewater piezometers is not possible due to nature of the shoreline substrate, the Ministry expects that every attempt will be made to use alternative approaches to assess potential contamination of groundwater/porewater. While surface water and well water quality data collected in August, 2013 may lead to the expectation that the spilled product likely did not migrate into and through shallow groundwater areas, it is important to use empirical evidence to confirm this especially since shallow alluvial aquifers may be recharged during higher flow periods as stated in SNC's table-top conceptual site model.
- Identification of elevated porewater concentrations should trigger further groundwater quality assessment.

Biological Programs

3.2.1.1 Benthic Invertebrate Program:

- It would be helpful for public understanding of the monitoring program, if proposed sites for benthic monitoring as well as sites with historic data monitored by Slocan River Stream keepers, MOE, etc., were identified on the maps.
- When analyzing and reporting data, please identify any benthic invertebrate metrics/indices that Slocan River Stream keepers have utilized on historical data collected from the Slocan River or Lemon Creek.
- Please consider addressing recent observations of unusual abundance of periphyton growths identified by the Slocan River Stream keepers.

Please let me know if you have any questions.

Regards,

Robyn Roome

Regional Director

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