



# **Environmental Management Requirements (EMR) for Hazardous Building Materials and Contaminated Sites**

**Effective Date: November 2025**

(Revised from: September 2016)



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## Preface

The purpose of this manual, *“Environmental Management Requirements (EMR) for Hazardous Building Materials and Contaminated Sites”*, is to provide a resource to Alberta Infrastructure staff and consultants dealing with the removal and disposal of hazardous materials found within a building and the management of contaminated sites on projects managed and contracted by Alberta Infrastructure.

The current scope of the EMR includes the following “hazardous materials” in buildings and on sites:

“Hazardous materials” in buildings:

- Asbestos
- Biohazardous materials
- Lead
- Mercury
- Mould
- Ozone depleting substances (ODS)
- Polychlorinated Biphenyls (PCBs)
- Radioactive components in smoke detectors
- Unidentified abandoned chemicals

“Hazardous materials” on sites:

- Petroleum Hydrocarbons (PHC)
- Volatile organic compounds (VOCs)
- Polycyclic aromatic hydrocarbon (PAH)
- Salt
- Heavy metals
- Non-chlorinated phenols and pentachlorophenol (PCP)

*\*Not all of these materials are regulated as “hazardous materials” under legislation.*

This edition of *“Environmental Management Requirements (EMR) for Hazardous Building Materials and Contaminated Sites”* is intended to be periodically updated to reflect the department’s EMR requirements and objectives and to assist staff and consultants in implementing the objectives of the EMR. Suggestions on how to improve this manual are welcome. Please address comments and suggestions as follows:

For hazardous materials within buildings:

Manager, Building Environment Unit (BEU)  
Tel: 780-422-7472

For contaminated sites:

Team Lead, Site Services and Environmental Engineering Unit  
Tel: 780 499 2543

Technical Services and Procurement Branch  
Strategic Integration and Operations Division  
Alberta Infrastructure  
3rd Floor, Infrastructure Building  
6950 - 113 Street NW, Edmonton, AB T6H 5V7  
Email: [infras.trc@gov.ab.ca](mailto:infras.trc@gov.ab.ca)

The Infrastructure Technical Resource (Public Internet Site) contains:

- Environmental
  - Environmental Management Requirements (EMR) for Hazardous Building Materials and Contaminated Sites
  - Hazardous Materials Work Process
  - Contaminated Site Work Process
  - [Environmental Management Requirement Checklist](#)
    - ◆ Asbestos Checklist
    - ◆ Biohazardous Material Checklist
    - ◆ Lead Checklist
    - ◆ Mercury Checklist
    - ◆ Mould Checklist
    - ◆ Ozone depleting substances (ODS) checklist
    - ◆ PCB Checklist
    - ◆ Radioactive components in smoke detectors Checklist
    - ◆ Unidentified Abandoned Chemicals Checklist
- [EMR related Basic Master and Technical Specifications for Owned Infrastructure](#)
- [General ITR Site](#)

The following internal documents and resources are available to the Alberta Infrastructure (INFRAS) project management team:

- Environmental Policy – Hazardous Materials (PIMs website)
- The Project Information Management System (PIMS) Repository (Intranet Site) contains:
  - Construction Start-Up Meeting Agendas and Minutes templates

These documents and other EMR related documents will only be published in electronic format. These are the latest editions.

# 1.0 Management of Contaminated Sites

## 1.1 Introduction

Contaminated sites represent an environmental liability in addition to their impacts on humans and the surrounding environment.

A multiphase process is used to assess and manage environmental issues related to contaminated sites.

Below is more information on the typical phases of an environmental site assessment. Please note that each site is different and may combine phases.

## 1.2 Phase I Environmental Site Assessment (ESA)

The purpose of the Phase I ESA is to identify actual and potential site contamination. Such identification involves the evaluation and reporting of existing information collected through records review, site visits, and interviews. Alberta Environmental Site Assessment Standard (December 2024) specifies the scope of work of Phase I ESA.

## 1.3 Phase II Environmental Site Assessment (ESA)

The purpose of a Phase II ESA is to confirm the presence of and characterize the substances of concern at a given site through intrusive sampling. Where contaminants of concern are identified through an initial Phase II investigation, one or more supplementary Phase II ESAs involving full delineation of the contaminated areas are required as defined in Alberta's framework (described in item 1.4).

Alberta Environmental Site Assessment Standard (December 2024) has been developed to assist Clients and Assessors to plan and implement Phase II ESA investigation.

The principal components of a Phase II ESA are as follows:

- a) Review of existing Phase I ESA and previous Phase II ESA, if any, and other background information;
- b) Developing a Conceptual Site Model;
- c) Planning a site investigation, including development of sampling plans;
- d) Conducting site investigations;
- e) Interpreting and evaluating the data gathered during investigations; and
- f) Summarizing conclusions and providing recommendations.

## 1.4 Phase III REMEDIATION AND CONFIRMATORY SAMPLING

An action plan would be required if the Phase II ESA reveals that existing levels of contaminants did not meet the guidelines. Alberta's framework for the management of contaminated sites is designed to achieve three policy outcomes: 1) Pollution prevention, 2) Health protection, and 3) Productive use.

## 1.0 Management of Contaminated Sites

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Under this framework, three options are provided for the management of contaminated sites as the proponent proceeds from initial site assessment to regulatory closure. The three options are:

- Alberta Tier 1 – generic remediation guidelines
- Alberta Tier 2 – site-specific remediation guidelines based on the modification of Tier 1 guideline
- Exposure Control – risk management through exposure barriers or administrative controls based on site-specific risk assessment

Recommended site remediation is based on a variety of factors including:

- site and contaminants characteristics
- severity of risk to the surrounding environment
- time required to remediate the site
- availability of funds

### 1.4.1 Alberta Tier 1 - Generic Remediation Guidelines

Tier 1 remediation guidelines are generic. They are developed to protect sites at the more sensitive end of the range and can therefore be used at most sites without modification.

### 1.4.2 Alberta Tier 2 – Modified Generic Remediation Guidelines

The Tier 2 approach allows for consideration of site-specific conditions through the modification of Tier 1 guidelines and/or removing exposure pathways that may not be applicable to the site.

Tier 1 and Tier 2 involve physical removal of contaminants. There are a wide variety of technologies available for the remediation of contaminated soils and groundwater depending on the contaminant and soil types, including:

- Excavation and disposal (dig and dump);
- Encapsulation;
- Landfarming – see [Code of Practice for Land Treatment of Soil Containing Hydrocarbons](#);
- Soil Vapour Extraction (SVE);
- Thermal desorption;
- Groundwater pump and treat; and
- Enhanced Natural Attenuation.

### 1.4.3 Exposure Control – Risk Management

Exposure Control is required when contamination exceeds Tier 1 or Tier 2 remediation guidelines where measures to preserve the site conditions or exposure assumptions are required to obtain acceptable risk levels, or otherwise to limit exposure to acceptable levels.

## 1.0 Management of Contaminated Sites

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Exposure Control includes site management measures designed and implemented to ensure that exposures do not result in human and ecological risks in excess of levels considered acceptable.

Long-term risk management options are designed to eventually meet a Tier 1 or Tier 2 objective. Monitoring is required to verify predictions and control efficacy.

### 1.5 Responsibilities

1. The responsibility of INFRAS project management team is to be aware of the environmental phases and the role of the environmental consultant. For information on this process see Contaminated Site Work Process. [https://www.alberta.ca/system/files/custom\\_downloaded\\_images/tr-contaminatedsitesworkprocess.pdf#search=tr%2Dcontaminatedsitesworkprocess%2Epdf](https://www.alberta.ca/system/files/custom_downloaded_images/tr-contaminatedsitesworkprocess.pdf#search=tr%2Dcontaminatedsitesworkprocess%2Epdf)
2. The Environmental Management portion related to the management of contaminated sites resides with Alberta Transportation.
3. Site Services and Environmental Engineering Section, Technical Services and Procurement Branch, Alberta Infrastructure is the contact for all site contamination issues including coordination with Alberta Transportation.

### 1.6 Contact

Team Lead, Site Services and Environmental Engineering

### 1.7 Tel: 780 499 2543 Additional References

- [Alberta Environmental Protection and Enhancement Act](https://open.alberta.ca/publications/e12) (https://open.alberta.ca/publications/e12)
- [Alberta Tier 1 Soil and Groundwater Remediation Guidelines](https://open.alberta.ca/publications/1926-6243) (https://open.alberta.ca/publications/1926-6243)(<http://aep.alberta.ca/lands-forests/land-industrial/inspections-and-compliance/documents/AlbertaTier1Guidelines-Feb02-2016A.pdf>)
- [Canadian Soil Quality Guidelines for the Protection of Environmental and Human Health](https://publications.gc.ca/site/eng/269482/publication.html) (https://publications.gc.ca/site/eng/269482/publication.html)
- [Alberta Environmental Site Assessment Standard](https://open.alberta.ca/publications/environmental-site-assessment-standard) (https://open.alberta.ca/publications/environmental-site-assessment-standard)
- [Code of Practice for Land Treatment of Soil Containing Hydrocarbons](https://open.alberta.ca/dataset/hydrocarbons) (https://open.alberta.ca/dataset/hydrocarbons)
- [Alberta Site-based Remediation Certificate Guide](https://open.alberta.ca/publications/alberta-site-based-remediation-certificate-guide) (https://open.alberta.ca/publications/alberta-site-based-remediation-certificate-guide)

## 2.0 Environmental Incident Report (Site Related)

### 2.1 Incident Report

Environmental incidents could happen anywhere, such as parking lots, roads, and construction sites. An environmental incident occurs when any one of the following events occurs:

- .1 Any spill, release or emergency that may cause, is causing, or has caused an adverse effect to the environment;
- .2 The release is at or in excess of the quantities or emission levels set out for the substance in the Table in section 8.2 (1) of Part 8 of the Transportation of Dangerous Goods Regulation ([SOR/2016-95](#));
- .3 The substance is released into a water course or into groundwater or surface water. This applies regardless of whether the quantity or emission level of the release is at or in excess of the levels set out for the substance in the Table in section 8.1(1) of Part 8 of the Transportation of Dangerous Goods Regulations.

Whenever above environmental incident occurs, the Contractor is required to notify and submit reports as follows:

- .4 Immediately notify the Infrastructure Project Manager of the incident.
- .5 Immediately notify Alberta Environment (phone: 1-800-222-6514).
- .6 Immediately submit to Alberta Environment a completed [Environment Release Report](#) (fax 780-427-3178 or email [ERC.Environment@gov.ab.ca](mailto:ERC.Environment@gov.ab.ca)) and copy the Infrastructure Project Manager. For more information on Release Reporting [click here](#).
- .7 Within 7 days of release, submit to Alberta Environment a completed [Environmental Release Follow-up Report](#) (fax: 780-427-3178 or email [ERC.Environment@gov.ab.ca](mailto:ERC.Environment@gov.ab.ca)) and copy the Infrastructure Project Manager.

The Project Manager is required to immediately notify the:

- .8 Infrastructure Deputy Minister;
- .9 Infrastructure EMR contact person;
- .10 Building Operator/Manager.

For other environmental incidents, the Contractor is required to clean up the site immediately, and the Project Manager is required to immediately notify the:

- .11 Infrastructure EMR contact person
- .12 Building Operator / Manager

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## 2.0 Environmental Incident Report (Site Related)

### 2.2 Clean-Up

Clean-up as soon as possible. Every effort should be made to restore the site to an operational condition as soon as possible. Should fatalities result, it will be necessary to wait until the site is released by the Medical Examiner, the Police, and the Alberta Human Services Occupational Health and Safety Officer. The [Occupational Health and Safety Contact Centre](#) phone number is 1-866-415-8690.

In the event of a hazardous environmental release, it may be necessary to wait until the site is cleared by Alberta Environment or the local authority's emergency response team, or other regulatory agencies.

### 2.3 Post Incident Recovery

Post incident recovery activities should be initiated as soon as possible, preferably while emergency response activities are underway, to ensure the following:

- 1 **Restoration of service.** An emergency may adversely affect the services provided to building occupants.
- 2 **Repair of damaged equipment.** An emergency incident may result in damage to site equipment or facilities. Temporary equipment or facilities may be required to resume services.
- 3 **Alternate work plan, rescheduling of work.** An emergency incident or spill may require prolonged clean-up activities that may affect work schedules. Alternate work schedules may be required to keep projects on schedule.

### 3.0 Management of Hazardous Materials for Buildings

#### 3.1 Introduction

Additions to existing buildings, renovation and demolition projects may involve the disturbance of “hazardous materials”. These “hazardous materials” include:

- Asbestos (U)
- Biohazardous materials (U/R)
- Lead (R)
- Mercury (R)
- Mould (U)
- Ozone depleting substances (ODS)(R)
- Polychlorinated Biphenyls (PCBs) (R)
- Radioactive components in smoke detectors (R)
- Unidentified abandoned chemicals (U/R)

(U) = Unregulated materials

(R) = Regulated materials

(U/R) = Some materials in this category are unregulated others are regulated

#### 3.2 Hazardous Building Materials Survey

- .1 The Project Manager is to contact the Building Environment Unit Manager to discuss the project scope of work details and to inquire about historical environmental file information for the subject building.
- .2 If there is any potential that “hazardous building materials” may be disturbed, the Project Manager is to review all available and pertinent environmental file information to determine if there has been an appropriate hazardous building materials survey.
- .3 If there is no environmental information for the building, or if existing information is not applicable to the project, the Project Manager will initiate a hazardous building materials survey. Contact the Building Environment Unit Manager for further direction and guidance.
- .4 The Building Environment Unit:
  - .1 will conduct a hazardous materials survey, if resources are available, or
  - .2 if resources are unavailable, will recommend that an environmental consultant be retained to conduct the hazardous materials survey.
  - .3 will also assist in the development of scope of work documents.

## 3.0 Management of Hazardous Materials for Buildings

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### 3.3 Contract Documents

- .1 The Building Environment Unit is available for consultation and assistance with hazardous removal materials specifications using INFRAS Basic Master and Technical Specifications.
- .2 When developing contract documents consider the need for a Mandatory Pre-Tender Site Meeting.
- .3 The Building Environment Unit is to be kept informed and involved during the development of contract documents and should review specifications for every project.
- .4 Environmental consultants may be engaged by the Project Manager to develop the contract documents under the guidance of the Building Environment Unit.

### 3.4 Waste Generator Number

- .1 A Waste Generator Number must be assigned by Alberta Environment before regulated hazardous materials are transported and disposed.
- .2 Building Environment Unit possesses a generic Waste Generator Number (G4537) available for use on Alberta Infrastructure projects.
- .3 The Contractor is to advise Alberta Environment of the projects utilizing Infrastructure's Waste Generator Number and inform the Project Manager and the Building Environment Unit that this has been done.

### 3.5 Manifest

- .1 An Environment shipping and waste manifest is required to accompany each load of "regulated" hazardous materials.
- .2 A non-hazardous shipping and waste manifest from the appropriate authority is required to accompany each load of "unregulated" hazardous materials.

### 3.6 Environmental Consultants

The Project Manager is to engage an environmental consultant to monitor and air test contractor's performance of the hazardous materials abatement and/or remediation.

#### Hazardous Materials Compliance Checklist

- .1 Hazardous Materials Compliance Checklists are used by Project Managers as a tool to verify that the consultant and contractor are taking appropriate actions when handling hazardous materials. The checklist is used when undertaking a project or work that involves a hazardous material (i.e. typically this would apply to building renovations or demolition, but could also apply to new construction, if biohazards were found or if mercury, radioactive components, or chemicals were installed).

## 3.0 Management of Hazardous Materials for Buildings

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- .2 Hazardous materials checklists are available for:
  - Asbestos;
  - Biohazardous materials;
  - Lead;
  - Mercury;
  - Mould;
  - Ozone depleting substances (ODS);
  - Polychlorinated Biphenyls (PCBs);
  - Radioactive components in smoke detectors;
  - Unidentified abandoned chemicals.
- .3 Each checklist includes a list of regulatory requirements specific to the hazardous material it addresses.
- .4 The Project Manager completes the checklist, and files it appropriately.

### 3.7 Responsibilities

- .1 The Environmental Management portion related to the management of hazardous building materials during new construction, demolition, and renovation of buildings resides with Alberta Infrastructure.
- .2 It is the responsibility of the INFRAS project management team to engage the Building Environment Unit Manager for information on the management of hazardous materials in buildings work process. Refer to Hazardous Materials Work Process.

### 3.8 Contact

Manager, Building Environment Unit  
Tel: 780-422-7472

### 4.0 EMR Master Specifications for Buildings

#### 4.1 Master Specifications

The following Infrastructure Technical Specifications apply to the EMR and are available in the Infrastructure Technical Resource website. These specifications will be regularly reviewed and updated. It is the consultant's responsibility to ensure the latest version of the Technical Specification is used and proper formatting for the specifications is followed.

##### **Division 02 - Existing Conditions**

02 82 01B.doc	Asbestos Control General Requirements
02 82 05B.doc	Asbestos Containment Procedures
02 82 15B.doc	Asbestos Encapsulation
02 82 33B.doc	Asbestos Removal
02 83 19B.doc	Removal and Disposal of Bulk Lead Materials and Lead-Based Paints
02 84 16B.doc	Removal and Disposal of PCB Capacitors and Ballasts
02 84 25B.doc	Removal and Disposal of PCB Transformers
02 85 05B.doc	Mould Removal General Requirements
02 85 16B.doc	Mould Containment Procedures
02 85 33B.doc	Mould Removal Procedures
02 91 19B.doc	Removal and Disposal of Ozone Depleting Substances (ODS)
02 92 19B.doc	Removal and Disposal of Mercury Components
02 95 00B.doc	Removal and Disposal of Biohazards
02 99 00B.doc	Removal and Disposal of Radioactive Components in Smoke Detectors

Basic Master and Technical Specifications can be found at Infrastructure's [Technical Resource website](#).

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## 5.0 Procedures for Construction Phase (Sites and Buildings)

### 5.0 Procedures for Construction Phase (Sites and Buildings)

#### 5.1 Operational Controls

##### 5.1.1 Introduction

Operational controls are established to ensure Infrastructure activities (including those conducted by contractors and consultants) take place with minimum environmental impact in accordance with the specifications, legal and other requirements.

##### 5.1.2 Responsibilities

The INFRAS project management team, consultants, and contractors are to understand and implement operational controls for their activities that have significant environmental impacts.

Development and implementation of operational controls:

- 1 Identify those activities related to the project that have significant environmental aspects or have the potential for environmental impact. This can be accomplished by conducting a hazard assessment for the project.
- 2 Review existing procedures and practices to determine if controls already in place manage the risk and hazard potential.
- 3 Determine activities and potential risks and hazards with significant environmental aspects for which no controls are in place.
- 4 Review and revise submitted operational controls to ensure they adequately address significant environmental aspects.

The consultant site representative provides oversight to contractor activities and identifies issues or hazards before they become incidents. The contractor ensures that all necessary actions to prevent an incident are in place. If an incident occurs, the contractor ensures all corrective actions are undertaken.

##### 5.1.3 Communication of Operational Controls

Contractors and sub-consultants, on behalf of Infrastructure, conduct activities with significant environmental aspects. Environmental expectations for contractor activities are communicated to the contractors by:

- Requests for proposals;
- Contractor prequalification;
- Tender documents;
- Project specifications;
- Pre-project start up meetings;
- Hazard Assessment reports;
- Monitoring reports;

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## 5.0 Procedures for Construction Phase (Sites and Buildings)

- Review of emergency response plans;
- Regular communication with Infrastructure project managers.

### 5.1.4 Monitor Performance of Projects

Qualified consultants may be hired for projects having significant environmental aspects related to hazardous materials and contaminated sites. Consultants monitor on-site contractor and sub-contractor activities to ensure that expectations are met for handling hazardous materials and contaminated sites in accordance with project specifications, legal and other requirements.

## 5.2 Project Start-up

### 5.2.1 Introduction

Relevant environmental issues are to be discussed at the start up meeting for new construction, renovation and demolition projects and for the management of contaminated sites.

The INFRAS project management team is to ensure that the consultant and contractors are aware of all contractual environmental requirements. The INFRAS project management team and consultant must ensure that environmental requirements are addressed at subsequent project meetings.

### 5.2.2 Construction Contract Start-up Procedures

The INFRAS project management team, consultants and contractors are to be aware of the clauses pertaining to environmental requirements as stated in the Construction Start-up Meeting Minutes.

Construction Start-Up Meeting Minutes and procedures are located on the PIMS repository. (INFRAS internal resource)

If there are hazardous materials and/or environmental site concerns, INFRAS project management team must provide a copy of these minutes to the relevant TSB contact, Director of Site Services Section and/or Manager of Building Environmental Unit.

## 5.3 Emergency Response Plan

### 5.3.1 Introduction

The purpose of a planned response to hazardous materials spill or release is to minimize the potential impact to the environment and personnel, and to contain the immediate hazard. In addition, the planned response is intended, as much as possible, to protect workers and the general public in the event of an incident.

### 5.3.2 Preparedness

The Project Manager must review the contractor's "Emergency Response Plan" and determine if the following requirements have been fully addressed;

## 5.0 Procedures for Construction Phase (Sites and Buildings)

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- .1 Hazard identification
  - .1 Hazard survey;
  - .2 Risk analysis;
  - .3 Impact analysis;
  - .4 Roles and responsibility; and
  - .5 Prevention measures.
- .2 Contact lists
  - .1 Contractor / subcontractors;
  - .2 Project manager;
  - .3 Consultant; and
  - .4 Emergency response leader and response team members.
- .3 Emergency equipment and resources
- .4 Municipal / County Fire Department:
  - Municipal / Regional Ambulance Service;
  - County / Municipal Police / RCMP;
  - Municipal Health Centre / Hospital;
  - Power Utility Company;
  - Gas Utility Company;
  - Water and Sewer Utility Company;
  - [Municipal Affairs](#);
  - [Alberta Environment and Protected Areas](#);
  - [Jobs, Economy, Trade and Immigration](#)
  - [Workers' Compensation Board](#);
  - [Transport Canada – Dangerous Goods](#);
  - [Alberta Transportation – Transportation of Dangerous Goods](#).

### 5.3.3 Alert and/or Response

“First responder” is the person who first becomes aware of the emergency situation. The first responder must immediately contact/alert the Emergency Response Leader. The first responder, if qualified, will:

- .1 Take all reasonable steps to bring the situation under control.
- .2 Perform the duties of Emergency Response Leader until relieved by the Emergency Response Leader
- .3 Be responsible for carrying out the instructions given by the Emergency Response Leader
- .4 Assesses the emergency as follows:

## 5.0 Procedures for Construction Phase (Sites and Buildings)

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- ◆ **Environmental impact.** What are local waterways, prevailing winds, drainage patterns, traffic patterns etc.
- ◆ **Occupational injuries.** Were any personnel affected by the release or spill of the hazardous material?
- ◆ **Equipment damage.** Was any equipment damaged as a result of the release or spill of hazardous material?

The “Emergency Response Leader” is responsible for the effective resolution and management of the emergency through the application of:

.1 The response action plan

- ◆ Based on the nature of the hazardous release or spill, evacuation may or may not be required;
- ◆ Isolation of release or spill area;
- ◆ Time and event log;
- ◆ Establish emergency response post if required; and
- ◆ Recovery of hazardous materials.

.2 Resource allocation

- ◆ Emergency response can be handled with in-house resources;
- ◆ Spill containment and/or recovery; and
- ◆ Emergency response requires outside emergency responders.

.3 Situation update/review

- ◆ Related environmental contamination has resulted and action is required; and
- ◆ Testing and monitoring.

### 5.3.4 Incident Reporting

Refer to Environmental Incident Reporting, Section 3.

Link : Release Reporting Regulation:

<https://open.alberta.ca/dataset/8641a695-31d8-4782-b41f-0a5a3c0ccf61/resource/8641a695-31d8-4782-b41f-0a5a3c0ccf61/download/release-reporting-regulation.pdf>

### 6.0 Records Management

The Project Manager/Team must contact/engage the Manager, BEU and/or Team Lead, Site Services and Environmental Engineering at the early phases of their project.

#### 6.1 Project Files

- .1 Project files are maintained by Alberta Infrastructure to record all activities undertaken on a specific project. It is important that all files on a project involving an ‘environmental component’ are retained by Alberta Infrastructure indefinitely. The rationale is to be able to prove in the future that the appropriate procedures were undertaken in managing environmental issues. Records would indicate that necessary actions were undertaken to prevent or manage an environmental impact.
- .2 Alberta Infrastructure Central Records is set up to track Infrastructure projects that contain an environmental component (a part of the environment that the project may affect). Projects could include buildings, renovations, demolition projects, or projects involving contaminated sites.
- .3 The Project Manager is responsible to ensure the form/file is identified as a “Project Containing Environmental Components”.

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## 7.0 Training for INFRAS Project Management Team

### 7.1 Alberta Infrastructure Project Management Team Training

To comply with the new Environmental Management Plan all Alberta Infrastructure project management community members are asked to have the following training to manage their projects:

- .1 The following courses are required for all project management community members as identified in the Environmental Policy:

- .1 **Environmental Management Plan**

Infrastructure University e-learning modules; contact the PMO.

- .2 The following courses are strongly recommended for all project management community members. Note: each branch also has the option of doing its own training session focusing on construction and construction sites.

- .1 **GoA OHS Fundamentals**

The purpose of this course is to help you understand the Government of Alberta's Occupational Health and Safety (OHS) Program and its associated 10 elements. It will highlight your responsibilities and accountabilities to ensure the health and safety of everyone at the worksite.

Type: Online Learning

Length: 1.5 hours

Course ID: 1765

Audience: All Employees

Cost: Free

1GX Keyword: Fundamentals

- .2 **Asbestos Awareness Training**

The purpose of Asbestos Awareness Training is to ensure that all personnel who may encounter asbestos-containing materials (ACMs) during their work understand the associated health risks, recognize potential asbestos hazards, and know how to respond safely and appropriately.

- .3 Transportation of Dangerous Goods (TDG)

Some e-learning courses could be obtained via Danatec. The course is suitable for shippers/receivers/drivers; includes resources like placard guides. Alberta-focused option for \$35, their website: <https://danatec.com/products/7811-tdg-online-training>

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## 8.0 Appendix A – Alberta Environmental Site Assessment Standard

Environmental site assessment standard [2024]:

<https://open.alberta.ca/publications/environmental-site-assessment-standard>



# **Environmental Site Assessment Standard**

Title	Environmental Site Assessment Standard
Number	EPA, Lands Policy, 2024, No.5
Program Name	Lands Policy and Programs Branch
Original Date	March 1, 2016
Updated Date	December 17, 2024
ISBN No.	ISBN: 978-1-4601-6172-2
Disclaimer	Previous editions have been replaced by this current document. The effective date of this new document is as per the updated date.

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This publication is available online at <https://open.alberta.ca/publications/environmental-site-assessment-standard>

Any comments, questions, or suggestions regarding the content of this document may be directed to:

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## Preface

This document Environmental Site Assessment Standard (“the Standard”) is intended to provide a consistent outline of minimum requirements for Environmental Site Assessments (ESAs) in Alberta. It has been developed to assist in the planning, implementation, and reporting for Phase 1 ESAs, Phase 2 ESAs, and confirmatory assessments (e.g. remediation reports) and provides guidance on Alberta Environment and Protected Areas’ (EPA; “the department”) and the Alberta Energy Regulator’s (AER) requirements.

Some of the activities discussed in this Standard may require approval from the department, the AER, other regulatory bodies, or may have other legislative requirements. Persons using this document must ensure that all appropriate approvals are obtained, and the most recent and applicable requirements are followed, as documents are updated from time to time.

This document does not take into account site-specific conditions or the development of improved practices in conducting ESAs. It is not a substitute for the use of professional judgement in conducting ESAs. The sampling and ESA requirements and procedures to be followed for any particular site depend on the specific circumstances of the site and must be determined by the professional responsible for conducting the ESA.

The department is committed to updating the information in this document, as necessary. Direct suggestions and comments for future revision of this document to the department’s Land Policy and Programs Branch, 10th Floor, Oxbridge Place, 9820-106 Street NW, Edmonton, Alberta, T5K 2J6. Email: [Land.Management@gov.ab.ca](mailto:Land.Management@gov.ab.ca)

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## Definitions

For the purpose of the Environmental Site Assessment Standard, the following definitions apply.

**Area(s) of Potential Environmental Concern (APEC):** any area on, in or under the site and surrounding area where one or more contaminants of potential concern may be present, as identified through an initial Phase 1 ESA or other assessment, and that has not been ruled out through subsequent Phase 2 ESA.

**Contaminant(s) of Potential Concern (COPC):** any substance that is identified as potentially present on, in or under the site and surrounding area that, if released, has the potential for adverse effect.

**Discrete Sample:** A sample obtained from a single sampling point or location and is considered normally as being taken from a single use of the sampling tool used to obtain the sample.

**Environmental Site Assessment (ESA):** an assessment in relation to land to determine the environmental condition of property. It includes a Phase 1 environmental site assessment, a Phase 2 environmental site assessment and confirmatory assessment (e.g. a remediation report).

**First Developed Use:** the first development for human activity at the site for which there is potential for release of a contaminant of potential concern.

**Field Duplicate:** split samples or co-located samples are collected concurrently from the same location in the field using the same sampling procedure that are submitted to the laboratory “blind”; used to assess sampling and analysis precision.

**Split Sample:** split samples are duplicate samples collected from a single sample to assess the variability associated with the laboratory analysis of a selected parameter. Split samples can be used to assess variability associated with analysis of given analyte by different methods or by different laboratories.

# 1.0 Introduction

## 1.1. Purpose of the Standard

The purpose of the Environmental Site Assessment Standard (“the Standard”) is to provide minimum requirements for Environmental Site Assessment (ESA) site characterization and reporting at contaminated or potentially contaminated sites in Alberta. The Standard supports ESA information provided in the Contaminated Sites Policy Framework (Government of Alberta, 2023) and provides more details on reporting requirements where ESAs are required to be provided to the department or the AER. The document provides information on requirements under Part 5, Release of Substances in the *Environmental Protection and Enhancement Act* (EPEA; Government of Alberta, 2022a) as it relates to Section 111, Manner of Reporting.

The Standard is intended to be used by people responsible for planning ESA projects, implementing ESA programs, and carrying out the review of ESA reports.

## 1.2. Scope of the Standard

This Standard is meant to be used in conjunction with Alberta’s existing regulatory framework as outlined in the EPEA and Remediation Regulation (Government of Alberta, 2022b). This Standard supports documents such as the Contaminated Sites Policy Framework (Government of Alberta, 2023) and any individual approvals or codes of practice that may apply to a site. The following documents, as referenced in the Remediation Regulation Section 2, are hereafter referred to as “The Guidelines”:

1. Alberta Tier 1 Soil and Groundwater Remediation Guidelines (Alberta Tier 1) (Government of Alberta, 2024a)
2. Alberta Tier 2 Soil and Groundwater Remediation Guidelines (Alberta Tier 2) (Government of Alberta, 2024b)
3. Environmental Site Assessment Standard (2024)
4. Exposure Control Guide (AEP, 2016)
5. Risk Management Plan Guide (AEP, 2017)

The Standard addresses site evaluation and reporting processes, which include the following:

- Substance release notifications;
- Phase 1 ESA;
- Phase 2 ESA; and
- Confirmatory assessment (e.g., remediation report).

This Standard is not a stand-alone document and does not provide specific guidance on site characterization methods for conducting an ESA. It must be used in conjunction with:

- Canadian Standards Association (CSA) Phase 1 Environmental Site Assessment (CSA, 2022);
- CSA Phase 2 Environmental Site Assessment (CSA, 2018); and
- Canadian Council of Ministers of the Environment (CCME) Guidance Manual for Environmental Site Characterization in Support of Environmental and Human Health Risk Assessment Volumes 1 to 4 (CCME, 2016).

The following sources provide more guidance on ESAs that can be used in conjunction with this document:

- Supplemental Guidance on Site-Specific Risk Assessments in Alberta (Government of Alberta, 2022c);
- Ecological Risk Assessment Guidance Document (CCME, 2020); and
- Federal Contaminated Site Risk Assessment in Canada: Guidance on Human Health Preliminary Quantitative Risk Assessment (PQRA), Version 3.0 (Health Canada, 2021).

It is up to the professional and the site owner or operator who are responsible for the project to ensure adequate documented quality assurance and quality control (QA/QC) protocols are in place so that data collection, the

conceptual site model (CSM), and the report represent an accurate reflection of the risks associated with contaminants of potential concern (COPCs) that might be present at the site.

### 1.3. Environmental Site Assessment Process

The ESA process is often implemented in phases. Different terminology is used to describe these phases, but more important are the underlying concepts.

The first phase, Phase 1 ESA, involves an evaluation of historical and current land use. Site reconnaissance and other information gathering techniques assess whether a site is or may be subject to COPCs or actual contaminants of concern (COC). Areas of potential environmental concern (APECs) and associated COPCs may be identified through a Phase 1 ESA. A Phase 1 ESA does not include a sampling and analysis component.

Subsequent intrusive phases of assessments (e.g., Phase 2 ESAs) are designed to obtain quantitative analytical information regarding the nature and extent of COPC. In a Phase 2 ESA, quantification, and delineation of COPC concentrations per APEC are used to assess risks and, if necessary, evaluate contamination management options (including risk management and remediation). Data collected during a Phase 2 ESA must be compared to appropriate soil, sediment, surface water, and groundwater remediation guidelines. Exceedance of guidelines is a trigger for remedial measures, which could include further ESA and risk characterization of COPCs, remediation or risk management options (e.g. exposure control).

### 1.4. Legislation

The EPEA lays out the regulatory requirements related to substance releases, remediation, and reclamation in Alberta. The EPEA allows the Minister to establish guidelines and regulations. Alberta's Remediation Regulation (Government of Alberta, 2022b) forms key legislative requirements for taking remedial measures on substance releases to soil or groundwater. The ESA Standard is adopted pursuant to Section 38 of EPEA in Section 2 of the Remediation Regulation.

The EPEA prohibits the release of substances to the environment in an amount that causes, has caused, or may cause adverse effect. "Environment", "release", "substance", and "adverse effect" are defined in the EPEA. Whenever a release causes, has caused, or has the potential to cause an adverse effect, appropriate remedial measures must be taken. An ESA is often the first step in determining whether a substance release has the potential to cause an adverse effect and what remedial measures must be implemented in order to protect the environment.

Regulatory oversight of energy activity contaminated sites is conducted using the AER's Directives and the department's policies. Further information is available in AER Manual 021: Contamination Management (AER, 2021) and AER Directives.

#### 1.4.1. Substance Release Provisions

Environmental contamination is caused by accidental or deliberate release of substances to the environment. Regulatory concerns arise whenever the released substances are capable of impairment or damage to human health, safety, property, or the environment.

Under Part 5 of the EPEA, observed substance spills and release events create an immediate obligation to report the release. While some releases are immediately identifiable, others may be detected or confirmed through an ESA. Former activities at a site discovered through review of historical corporate records, or existence of physical evidence or field indicators such as stressed vegetation, soil discoloration, or offensive odours may be the first indication of the presence of a release of COPCs on a site. Where further assessment leads to confirmation of a substance release that may cause, is causing or has caused an adverse effect, the duty to report is the same as for observed substance releases.

Whenever a release may cause, is causing or has caused an adverse effect, appropriate remedial measures must be taken. The requirement to take remedial measures is triggered under Alberta's Remediation Regulation when the person responsible becomes aware of or ought to have become aware of the release of a substance into the environment (Government of Alberta, 2022b).

Alberta's Remediation Regulation further clarifies the Duty to Take Remedial Measures, as outlined in the EPEA. The person responsible must repair, remedy, and confine the effects of the release. Action must be taken to determine the nature and extent of the release, its impacts, and to remediate, manage, remove, or otherwise dispose of the COPCs in such a manner as to prevent an adverse effect, and to restore the environment to a condition satisfactory to the Director. Removing or controlling the source of the release to confine the effect of the substance must occur simultaneously with reporting the release to the department or AER and other appropriate agencies.

## **1.4.2. Release Reporting**

The department has published several documents relating to release reporting. Sections 110 and 111 of EPEA provide the basis for Alberta's Release Reporting Regulation (Government of Alberta, 2021), which stipulates what must be reported, when, how, and to whom. A Guide to Release Reporting (AENV, 2005) provides further information about the department's requirements outlined in the Alberta Release Reporting Regulation. For activities regulated by the AER, additional information is also available on the AER website under Release Reporting (AER, 2024c).

### **1.4.2.1. Initial Report**

Any spill, release or emergency that may cause, is causing, or has caused an adverse effect to the environment must be reported immediately to the department or the AER by calling the 24-hour Environmental Hotline at 1-800-222-6514 or through the electronic system provided by the department or the AER. Any other person who the person knows or ought to know may be directly affected by the release must be notified that their site could be impacted. A Guide to Release Reporting (AENV, 2005) provides further clarification.

### **1.4.2.2. Written Report (within 7 Days)**

Within seven days of the initial report, a written report must be submitted to the Director. The Director may waive the requirement for a written report if the initial report contained sufficient information and no adverse effects are likely from the release. A waiver may be requested at the time the initial report is being made. Unless and until the Director has granted a waiver, a written report must be submitted within seven days. For activities regulated by the AER, additional information is available on the AER website under Release Reporting (AER, 2024c).

This step will depend on the complexity of the situation. In some instances, such as abandoned well sites or pipelines where contamination is discovered as part of activities undertaken in pursuit of a reclamation certificate, there may be no need to submit a written report within 7 days. In other instances, such as small spills that are addressed quickly after the release, sites may move directly from the written report within 7 days to remediation. For other, more complex sites, this step may result in several iterations of the Phase 2 Environmental Site Assessment prior to remediation.

### **1.4.2.3. Additional Information Required by the Director**

The Remediation Regulation requires the person responsible to submit a Phase 2 ESA or complete remediation and submit a report to the Director in accordance with the requirements of The Guidelines. This is to be completed as soon as possible, after the person responsible becomes aware of or ought to have become aware of the release. In addition, pursuant to section 4(3)(h) of the Release Reporting Regulation, the Director may require additional information for the release. The Standard forms the basis of Director requirements under the substance release provisions where additional information in the form of a Phase 2 ESA is required.

### **1.4.2.4. New Information**

Section 2.1 of the Remediation Regulation states that in addition to requirements outlined in EPEA and the Release Reporting Regulation, where there is new information about the impact of a released substance to a person or land, there is a duty to report the information to an affected person and the Director at the time of discovery. New information may be discovered about the nature, effect or extent of the substance released through further environmental site assessment, development of Tier 2 guidelines, exposure control measures or a change in the conceptual site model from that initially presented.

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## 2.0 Remedial Measures

The implementation of remedial measures involves key elements of Alberta's Contaminated Sites Policy Framework (Government of Alberta, 2023) for the management of contaminated sites: source control, environmental site assessment, risk assessment, and contaminant management including remediation.

Whenever a release may cause, is causing or has caused an adverse effect, appropriate remedial measures must be taken (EPEA, Section 112). Under section 2.2 of the Remediation Regulations, when the person responsible becomes aware of, or ought to have become aware of, the release of a substance into the environment the person responsible must as soon as possible:

- Submit a Phase 2 ESA or complete remediation and submit a report to the Director in accordance with the requirements of The Guidelines, and
- Complete any other requirements specified by the Director.

If the site cannot be remediated to the satisfaction of the Director within a 2-year period after a person responsible becomes aware of, or ought to have become aware of the release, a remedial action plan acceptable to the Director must be immediately submitted in accordance with the requirements of The Guidelines.

### 2.1. Record of Site Condition

The Record of Site Condition (RoSC) form (AENV, 2014) is used as a summary document to track site and environmental information and update the progress of assessment and contamination management for sites (ESRD, 2012).

The RoSC form and declarations are required as a regulatory reporting requirement for all environmental reports documenting remedial measures under EPEA section 112, including Phase 2 ESAs, remedial action plans, remediation reports, exposure control plans, risk management plans and monitoring reports submitted to the department or the AER. The relevant RoSC form must be updated and submitted for every subsequent report to reflect the current known status of the site.

For activities regulated by the AER, additional information is also available on the AER website under Record of Site Condition (AER, 2024b).

## 3.0 Stakeholder Roles and Responsibilities

### 3.1. Responsibilities of the Proponent

For the purpose of this document, the proponent includes the “person responsible” under the EPEA and any other person who initiates an ESA. As directed in the EPEA (s. 110 to 112), the person responsible, the owner of the substance, or the person having control of the substance is required to report the substance release to the Director and other local authorities or relevant third parties; and take timely remedial measures.

The proponent must fulfill all responsibilities as specified in the CSA Phase 2 Environmental Site Assessment (CSA, 2018). Where an ESA is required as part of a substance release report, contaminant management submission, or as part of a closure requirement for a reclamation or decommissioning application the proponent must also:

- Ensure all Acts, Regulations, procedures, and other regulatory guidance in Alberta are followed during the work;
- Select appropriate environmental professionals (“the Professional”) and/or competent practitioners for the ESA, and where COPC(s) is/are found, for subsequent contamination management;
- Ensure full disclosure of any known condition about the site that may affect the outcome of the ESA, remediation, or risk management work. This could include specialized knowledge or experience related to the site, disclosure of relevant records, reasons for the proponent to request an ESA performed, or any other specialized knowledge that may be important to the professional to ensure that all appropriate documents are submitted to the department or the AER, and all affected third parties. The information must be accurate, consistent, and complete;
- Ensure the scope of work and deliverables are defined adequately to identify all likely APECs and COPCs;
- Where COPC(s) is/are found, ensure that the scope of work is adequate to remediate or otherwise manage risks associated with the release; and
- Ensure site environmental conditions are suitable for the intended use and meet all legal conditions and requirements.

### 3.2. Responsibilities of the Professional

Environmental reports to assess a substance release, such as ESAs and remediation/confirmatory sampling reports, submitted to the department or AER require a Professional Declaration with a Professional’s signature and stamp/seal or professional registration number for work completed after January 1, 2008. Reports submitted to the department or AER as part of a reclamation certificate application or remediation certificate application require a signed/stamped Professional Declaration (Government of Alberta, 2012) as per the requirements of EPA or AER.

Professionals must be practicing members in good standing with an organization that has professional legislation in Alberta that explicitly allows them to conduct remediation and reclamation work as defined in Professional Responsibilities in Completion and Assurance of Reclamation and Remediation Work in Alberta - Joint Practice Standard (Alberta Institute of Agrologists et al., 2012).

The Professional must maintain professional competency as outlined in Professional Responsibilities in Completion and Assurance of Reclamation and Remediation Work in Alberta- Joint Practice Standard (Alberta Institute of Agrologists et al., 2012) and have a minimum of five-years verifiable experience related to the Competencies for Remediation and Reclamation Advisory Committee Recommendations Report (AENV, 2006).

Members of one of the following six professional organizations must be involved in and sign-off on all ESA and remediation work:

- Alberta Institute of Agrologists (AIA)
- Alberta Society of Professional Biologists (ASPB)
- Association of the Chemical Profession of Alberta (ACPA)
- Association of Professional Engineers and Geoscientists of Alberta (APEGA)
- Association of Science and Engineering Technology Professionals in Alberta (ASET) or,
- Association of Alberta Forest Management Professionals (AAFMP).

The Professional must fulfill all responsibilities as specified in the Canadian Standards Association (CSA) Phase 2 Environmental Site Assessment (CSA, 2018) where an ESA is required as part of a substance release report or as part of a closure requirement for a reclamation or decommissioning application. Where a release is discovered as part of a Phase 2 ESA, the Phase 1 ESA becomes supporting documentation for the Phase 2 ESA. The Professional must follow procedures outlined in the Phase 1 ESA standard published by the CSA Phase 1 Environmental Site Assessment (CSA, 2022).

Additionally, the Professional will:

- Use due care, diligence, and judgement that is consistent with the charter requirements of the six recognized professional organizations;
- Possess knowledge based on an appropriate combination of formal education, skills, experience, and training in order to provide a technically sound and rational report;
- Remain objective and free from influence throughout the ESA process;
- Follow relevant regulatory requirements in provincial and municipal governments for ESA, remediation, risk management, and reclamation;
- Not undertake any activity that she or he is not qualified (and/or licensed/permitted, where applicable) to perform;
- Promptly communicate to the proponent any limitations imposed on the assessment resulting from the time frame and the scope of work, the environmental condition of the site as determined by the ESA, and any significant deviations from the original scope of work, prior to carrying out these new activities;
- Disclose possible and perceived conflicts of interest to the client and other relevant parties before entering into agreement for work;
- Provide sign-off for the work that was performed or coordinated, including a professional stamp or registration number;
- Ensure that any limitations imposed on the ESA or deviations from the initial scope are clearly communicated in the report;
- Carry adequate insurance throughout the duration of the ESA, including but not limited to general liability and errors and omission insurance; and
- Ensure that any practitioners or contributing professionals working under the professional's supervision are qualified and adhere to all the above requirements.

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## 4.0 Phase 1 Environmental Site Assessments

### 4.1. Introduction

The purpose of a Phase 1 ESA is to determine whether a particular site is, or may be, contaminated. When a Phase 1 ESA must be submitted to the department or AER, the Phase 1 ESA must follow the Standard and meet standards set by the CSA Phase 1 Environmental Site Assessment (CSA, 2022). and be in the appropriate format. This section provides additional requirements for conducting Phase 1 ESAs in Alberta and is intended to be generic to all Phase 1 ESAs.

### 4.2. Submission of a Phase 1 ESA

A Phase 1 ESA may be required by the department or AER to support a Phase 2 ESA, an application for a remediation certificate, or an application for a reclamation certificate. Additional forms, process and guidance have been developed for specific industrial applications such as AER's OneStop and the Requirements for Operational Soil Monitoring Program Proposal, as described in the Soil Monitoring Directive (AENV, 2009).

When a potential substance release has been confirmed and exceeds Alberta Tier 1 (Government of Alberta 2024a) or Alberta Tier 2 guidelines (Government of Alberta, 2024b), the results of any supporting Phase 1 ESA used in the development of the Phase 2 ESAs or remediation reports become part of the reporting requirements for the substance release. When a Phase 2 ESA is intended to assess all APECs and COPCs, the Phase 1 ESA becomes necessary to determine the scope of the Phase 2 ESA and becomes part of the assessment requirements.

When the Phase 2 ESA report was prepared as part of a release-reporting requirement and the substance release was not discovered through the normal course of a Phase 1 and Phase 2 ESA process, the requirement to conduct a Phase 1 ESA does not automatically become part of the release reporting requirements described in Section 1.4.2. Information that is submitted as part of the release reporting would be considered sufficient for identifying the area(s) of potential environmental concern.

### 4.3. Phase 1 ESA Required Components

The primary objective of a Phase 1 ESA is to determine whether a particular site is, or may be, contaminated. It is carried out by the proper collection and evaluation of sufficient information for the APECs. A complete Phase 1 ESA is critical for a successful Phase 2 ESA and any subsequent remediation activity.

The required components of a Phase 1 ESA are listed below and outlined in greater detail in subsequent pages:

- Scope;
- A records review;
- A site visit;
- Interviews; and
- Reporting, including clear conclusions as to whether a Phase 2 ESA is required.

#### 4.3.1. Scope

The scope must be included in any report submitted to the department or AER as part of an ESA. The scope of a Phase 1 ESA involves gathering information, evaluating the information, and writing a report. As a minimum, the scope must identify:

- The party for whom the Phase 1 ESA is being prepared;
- The subject site; and
- The activities to be completed for the components of the Phase 1 ESA.

### 4.3.2. Records Review

The records review gathers data on past activities that may have contributed to potential contamination on the site. Efforts must be made to obtain available records related to known or possible contamination from the site's first developed use to the Phase 1 ESA. This information must be reviewed and reported in the Phase 1 ESA report.

Since neighbouring properties may affect or be affected by the site being assessed, appropriate search distances must be determined, and consideration must be given to:

- Current and historical land use on the subject site and on neighbouring properties;
- Known or suspected contamination on the subject site and on neighbouring properties; and
- Where known, planned future use of the site, rezoning applications, or official plans for development.

Table 1 provides a summary of the required records to be reviewed and documented within a Phase 1 ESA. The following sections outline details required for a records review.

#### 4.3.2.1. General Records Review

A general records review for the subject property must include the following information from the first developed use to the time of the Phase 1 ESA:

- **Land title search:** Land title searches provide information on the chronology of ownership and any interests on title, such as upstream oil and gas surface leases or utility right(s)-of-way. Land title searches summarize information on the current and past owners of the site. A Land title search contributes to assessing the environmental condition of a site.
- **Other environmental site assessment reports or relevant information:** All relevant previous reports, including any relevant Phase 1 ESA, Phase 2 ESA, risk assessment, risk management or confirmatory reports, will be reviewed and information taken into consideration when preparing the final report. The amount of time since the previous report was prepared, changes in the conditions of the site since the assessment was conducted, types of activities that occurred at the site, conditions in the areas surrounding the site, and changes in environmental legislation will need to be considered when evaluating whether information is relevant to the current Phase 1 ESA. Information is to be summarized and referenced as part of the Phase 1 ESA.
- **Site plans:** Site and building plans of past and current property use. Where there are activities that are relevant to areas of potential concern that are documented in other records available in historically archived sources, these are to be included here. Locations of sumps, hydraulic lifts, vehicle or equipment maintenance areas, chemical storage areas, etc., are included in this inventory.
- **Fire insurance plans:** Fire insurance plans are to be included for any information relevant to COPCs and APECs.
- **Municipal land use plans:** will be reviewed for the property of interest and the adjacent properties.

#### 4.3.2.2. Physical Settings Reviews

The following information must be reviewed for the subject property and to a minimum of 300 m from the property boundaries:

- **Aerial photographs:** Photographs must be of the appropriate scale and date, based on the information required. For sites where there are significant changes or disturbance, special attention must be paid to ensure any changes are reflected in aerial photographs from periods prior to development, initial development, and current day.
- **Soil, hydrogeological, geological, and geotechnical reports:** Appropriate physical reports including existing soil, geological and geotechnical reports and maps, topographic maps shall be obtained and reviewed.
- **Well records:** Any pertinent well records, including Provincial Well records.

#### 4.3.2.3. Source Information

Source information may include any information that is relevant for identifying specific sources of COPCs that are part of official records. As a minimum, the following sources must be reviewed for the property of interest and a minimum of 300 m from the property boundaries.

- **National Pollutant Release Inventory**
- **Landfills:** Any information on existing or historical landfills.
- **Regulatory records:** This includes past, pending and outstanding or continuing prosecutions, violations of environmental statutes, regulations, by-laws, approvals, and permits that may impact the condition of the site, Environmental Protection Orders, Environmental Orders, OneStop, release reports, complaints related to environmental compliance that may impact the condition of the site spills, discharges of contaminants or inspections or any other reports submitted to relevant regulatory agencies.
- **Waste management records**
- **Official instruments:** Any official instruments including approvals, registrations, certificates including remediation and reclamation certificates, storage tank registrations, plant operating permits or other official certificates that pertain to activities at the site and that may impact the condition of the site.

#### 4.3.2.4. Operation or Company Records

For commercial and industrial properties, company records shall be examined. Exact documents will be dependent on the operation. Examples of documents to review include:

- Building plans;
- Permit records;
- Landowner lease agreements;
- Oil and gas well and facility files, including drilling, production, and abandonment records;
- Production and maintenance records (e.g., process control diagrams);
- Spill/substance release reporting records;
- Asbestos surveys;
- Site utility drawings;
- Emergency response or contingency plans, including spill reporting plans;
- Inventories of chemicals and their usage (e.g., WHMIS, SDS);
- Environmental monitoring data;
- Environmental audit reports;
- Liability assessments; and
- Current and previous land use.

#### 4.3.2.5. Other Records

Other records, such as site use records, tax rolls, municipal archives, photographs, or telephone directories, and newspapers, may also provide useful information for the Phase 1 ESA.

#### 4.3.2.6. Regulatory Information

In the event that an agency does not respond by the report date, documented proof must be provided demonstrating that a reasonable attempt was made to obtain the information.

#### 4.3.2.7. Identifying Contaminants of Potential Concern

Use the following documents when determining what COPCs may be associated with the site. The lists provided in these documents are not intended to be exhaustive, but are to be used when identifying contaminants of potential concern:

- Appendix 1 and 2 within Phase 1 ESA Guideline for Upstream Oil and Gas Sites (AENV, 2001);
- Table 4-1 (Volume 1) of CCME's Guidance Manual for Environmental Site Characterization in Support of Environmental and Human Health Risk Assessment (CCME, 2016);
- Table A2 of Health Canada's Federal Contaminated Site Risk Assessment in Canada: Guidance on Human Health Preliminary Quantitative Risk Assessment (PQRA) (Health Canada, 2021);
- Guidance for Potential Contaminants of Concern at Commercial and Industrial Land Uses published by the Society of Contaminated Sites Approved Professionals of British Columbia (CSAP, 2023); and
- Industry Profiles published by The United Kingdom Department of Environment (UKDoE, 1995).

**TABLE 1: SUMMARY OF RECORDS REVIEW INFORMATION RELATED TO THE PROPERTY OF CONCERN AND SURROUNDING PROPERTIES.**

Records	Area Covered		
	Phase 1 Property	Adjacent Properties	Within 300 metres from Phase 1 property
<b>General</b>			
Land title search	x		
Other Environmental Site Assessment reports or relevant information	x		
Site plans, other relevant information for APECs	x		
Fire insurance plans	x		
Municipal land use plans	x	x	
<b>Source Information</b>			
National Pollutant Release Inventory	x	x	x
Records concerning environmental incidents, orders, offences, spills, discharges of contaminants, inspections	x		
Waste management records	x		
Any reports submitted to relevant regulatory agency	x		
Petroleum Tank Management Association of Alberta registration, retail fuel storage tank information	x		
Landfill information	x	x	x
Official instruments including remediation certificates or other certificates	x	x	
<b>Physical Settings Review</b>			
Aerial photographs	x	x	x
Topographic maps	x	x	x
Physiographic maps	x	x	x
Geological maps	x	x	x
Well records	x	x	x
<b>Operation records</b>			
Regulatory permits or records related to APECs	x		
Material safety data sheets	x		
Underground utility drawings	x		
Inventories of chemical uses and chemical storage areas	x		
Inventory of aboveground and underground storage tanks	x		
Environmental monitoring data including soil or groundwater monitoring reports, as required	x		
Waste management records	x		
Process, production, and maintenance documents related to the property	x		
Any records of spills or discharges of COPCs	x		
Emergency response or contingency plans	x		
Environmental inspection or audit reports	x		

### 4.3.3. Site Visit

A site visit shall be conducted as part of the Phase 1 ESA. Ideally, this is after completion of the records review, to enable a more targeted site visit.

Direct observation of the subject site shall be conducted. The methods used to make the observations, general limitations (including those imposed by physical obstructions like adjacent buildings, bodies of water, and paved areas) and limiting conditions (e.g., snow or rain, denied access, inaccessible areas, and safety considerations) shall be documented.

Observations must include:

- **Current uses or evidence of past uses of the site:** that involve such activities as the use, treatment, storage, disposal, and generation of hazardous materials, landfilling, or the storage of wastewater in impoundments. The current or past uses of the adjoining and surrounding site shall also be considered.
- **Disturbed areas:** as revealed in an aerial photograph, must be visually inspected for evidence of contamination.
- **Hazardous materials (including wastes) and unidentified substances:** shall be listed, and relative quantities of material, types of containers, and storage conditions listed and described.
- **Storage tanks and containers (e.g., drums, totes, and pails):** the approximate age, size, and, where possible, contents of storage tanks and containers must be identified. Abandoned, former and current aboveground and underground storage tanks, vent pipes, fill pipes, access ways, secondary containment, and other infrastructure associated with tank installations must be identified and described.
- **Other indications of a potential substance release:** e.g. odours, discolouration, and their possible sources must be described.
- **Potable water:** sources of potable water and sewage disposal for the site must be visually inspected and described.
- **Receptors:** potential receptors, distance to receptors, and impact to receptors must be identified and described.

#### 4.3.3.1. General Description of Structures

A general description of structures and other improvements to the site. This description shall include a description of the number of buildings, as well as the estimated age, size, number of stories and location, and are to be confirmed with information from the records review.

#### 4.3.3.2. Interior Observations

The interior of structures on the site shall be inspected for indicators of contamination, such as heavy stains, vapours from volatile chemicals, or large cracks on the floor or sump where process chemicals are used or stored. Buildings on industrial sites shall be inspected for spill containment and separation from the soil (e.g., concrete floors with grated sewers). Unless access is available, it is not necessary to look under floors, above ceilings, or behind walls. Within reason, all accessible rooms within the structures shall be inspected.

#### 4.3.3.3. Heating and Cooling Systems

Heating and cooling systems shall be identified and described in terms of the energy (fuel source) and methods used to release or dispose of waste products (e.g., combustion gases and ash).

#### 4.3.3.4. Staining

Stains on floors, walls, or ceilings shall be identified and described. Where practical, the areal extent of the staining shall be identified, and the likely spill source shall be described. The presence of cracks, proximity of floor drains and catch basins, or any other opportunities for COPCs to migrate away from a source shall be described. Stained materials (e.g., soil and asphalt) shall be identified and described.

#### **4.3.3.5. Drains and Sumps**

The location and condition of current and former floor drains and sumps shall be noted. The frequency of sediment removal from drains and sumps and the location of discharge shall also be described where known.

#### **4.3.3.6. Mechanical Equipment**

The presence and, where possible, the condition of equipment, such as hydraulic hoses, elevators, or in-ground vehicle hoists, shall be identified and described.

#### **4.3.3.7. Exterior Observations**

The exterior structures on the site shall be observed for indication of contamination. This inspection shall include an inspection of the exterior surfaces of structures (e.g., the base of wall surfaces, the roof in some cases) and of the grounds in most cases.

#### **4.3.3.8. Observation of Adjoining Properties**

The grounds of the adjoining properties and associated structures shall be observed from the site and from publicly accessible vantage points.

#### **4.3.3.9. Topographic, Geological and Hydrogeological Conditions**

The topographic conditions of the site and surrounding area shall be observed and noted. Where exposure of the subsurface exists (e.g., berms, trenches, pits, and ponds), these shall be described and compared with a general description of the geologic and hydrogeological conditions, and drainage patterns provided.

#### **4.3.3.10. Wells**

Visible abandoned boreholes, test pits, wells, and existing wells (e.g., water, oil, gas, and disposal) shall be identified and described on site and off site. Evidence of drilling waste or soil cuttings shall be identified.

#### **4.3.3.11. Storage Tanks and Process Vessels**

All existing, abandoned or removed infrastructure, such as storage tanks or process vessels used for chemicals, process water, fuel, pesticides, drilling mud, and wastes, shall be identified and described.

#### **4.3.3.12. Waste and Sewage Disposal**

The method of waste and sewage disposal shall be identified and described. This includes the locations and conditions of the waste and sewage systems, such as landfills, septic systems, or cesspools on the site.

#### **4.3.3.13. Pits and Lagoons**

Pits and lagoons on the site and on adjoining properties shall be identified and described, particularly if they have been used in connection with waste disposal or waste treatment. It must also be noted if these structures have been constructed with geo-membranes or other containment techniques. This information may be corroborated from/with site file review information and/or interviews.

#### **4.3.3.14. Stressed Vegetation**

The locations and extent of stressed vegetation shall be identified and described. Stressed vegetation shall be inspected on adjacent properties, where applicable, as the nature of subsurface COPCs may affect off-site properties and not affect any vegetation on the site.

#### **4.3.3.15. Fill**

Areas that appear to have been filled or graded by non-natural causes (or filled with material of unknown origin) shall be identified and described and supported with analytical results confirming that any soil imported to the property meets applicable criteria and/or guidelines.

#### **4.3.3.16. Wastewater**

Wastewater or other liquid discharge shall be identified and described.

#### **4.3.3.17. Watercourses, Ditches, or Standing Water**

Surface water features (e.g., ditches, streams, rivers, ponds, and lakes) on and off site shall be identified and described (e.g., whether they are permanent or intermittent). Ephemeral water bodies or low areas and depressions in the ground surface shall be noted, often using high water marks or vegetation growth patterns.

#### **4.3.3.18. Roads, Parking Facilities, and Rights-of-Way**

Public thoroughfares, crossing or bordering the site, shall be identified.

#### **4.3.3.19. Special Attention Items**

Note the presence of the following COPCs:

- Drilling waste – as per Assessing Drilling Waste Disposal Areas: Compliance Options for Reclamation Certification (AER, 2014)
- Polychlorinated biphenyls (PCBs);
- Perfluorooctane sulfonate (PFOS);
- Perfluorooctanoic acid (PFOA);
- Naturally occurring radioactive materials (NORMs);
- Asbestos-containing materials (ACMs);
- Lead;
- Mercury;
- Ozone-depleting materials; and
- Urea foam formaldehyde insulation (UFFI)

These substances and other conditions (e.g., radon, mould, noise, electric and magnetic fields, and vibration) require special attention because of heightened public concern or specific environmental legislation.

#### **4.3.4. Interviews**

Interviews are used to corroborate the information gathered in the records review and site visit or provide information useful for planning the site visit. Efforts shall be made to interview a representative number of persons knowledgeable about the nature and history of the site (e.g. current and past activities and events that may affect environmental conditions at the site). These interviews must include the current landowner, occupant, crown land and special area representatives, and a facility operator who is familiar with the site. Additional interview participants may be included to gain additional information regarding current and past activities and events that may affect environmental conditions at the site.

In the event that the interview is incomplete, or no response is provided, a reasonable effort shall be made and documented, with incomplete and nil answers identified in the Phase 1 ESA report.

### **4.3.5. Reporting**

The Phase 1 ESA report shall consist of a written document with a summary of the objectives, approach, findings, and conclusions and recommendations.

The report shall include detailed documentation and evaluation of the data and shall be complete, so that it is a stand-alone document. The report must document:

- Rationale explaining any deviations from the main components of a Phase 1 ESA;
- Any enhancements, as agreed upon in the scope of work; and
- All limitations encountered in the Phase 1 ESA, including those tasks that were not performed due to limiting conditions.

The report shall include an evaluation of the findings obtained in the records review, site visit, and interviews. The information shall be presented in a manner designed to help the reader (e.g., client, reviewer) understand the significance of the findings by:

- Identifying all APECs on the site that are associated with current and historical activities at the site and on neighbouring properties. The COPCs associated with each APEC must also be identified (e.g. using figures and tables);
- The use of appropriate figures and tables assists with the presentation of Phase 1 ESA findings.
- Clearly identifying areas of actual or potential contamination and the basis for all findings, including nil findings;
- Identifying potential receptors at risk both on and off the site; and
- Recommending whether a Phase 2 ESA is necessary or not.

#### **4.3.5.1. List of Professionals**

A list of all professionals who oversaw or performed components of the Phase 1 ESA, including role undertaken, qualifications, organization, and contact information shall be provided.

#### **4.3.5.2. Signatures and Qualifications**

The original signature and stamp or professional registration number for the environmental professional responsible for the Phase 1 ESA, confirming the findings and conclusions contained therein, shall be provided.

#### **4.3.5.3. References and Supporting Documentation**

The documentation, including references and key exhibits, to support the findings and conclusions contained in the report, shall be provided. Applicable federal, provincial, and municipal legislation and published guidelines used as a basis for findings or conclusions in a Phase 1 ESA shall be referenced in the ESA report.

Examples of supporting information may include, but are not limited to drawings, figures, tables, photographs, plans, logs, and appendices, as needed to describe, and verify the information contained in the ESA report.

## 5.0 Phase 2 Environmental Site Assessments

### 5.1. Introduction

Information provided under this section applies to the ESA components that include initial intrusive screening level sampling, and comprehensive delineation of contaminated areas. Where a release has occurred, the Phase 2 ESA report (or a remediation report) is required for characterization and delineation of the release and determining potential for adverse effect and as such, becomes part of the Director requirement for reporting under Part 5 of the EPEA and the Remediation Regulation.

The steps required for full delineation will vary, but the requirement for full delineation does not change. The site assessment process may be conducted in phases. Alternatively, aspects of remediation, source control or exposure control may be undertaken concurrently or prior to complete delineation. While these approaches are consistent with this Standard, the Contaminated Sites Policy Framework requires complete vertical and horizontal delineation in soil, groundwater, and other relevant media for all COPCs prior to undertaking risk assessment or acceptance of a risk management plan (Government of Alberta, 2023). For instance, where excavation was conducted and post-excavation samples fail to comply with Alberta Tier 1 or Alberta Tier 2 guidelines, full delineation of the remaining contamination must be undertaken and used to develop further remediation, risk assessment or risk management plans related to the remaining contaminants. Adequate delineation provides information needed to support appropriate decisions for the management of contaminated sites.

### 5.2. Purpose of Phase 2 ESAs

A Phase 2 ESA must determine the presence or absence of COPC(s) at a site, and the type, extent, degree, and approximate volume of contamination at the APEC(s). Where COPC(s) and APEC(s) are identified through an initial Phase 2 ESA, a more detailed Phase 2 ESA involving full delineation of the contaminated area(s) is required as defined in Alberta Tier 1 and Tier 2 guidelines (Government of Alberta, 2024a; 2024b).

Delineation programs must be extensive enough in both horizontal and vertical directions to enable the proper assessment of all applicable exposure pathways and receptors. Where this includes risk to the groundwater pathway or surface water receptors, delineation will include characterization of the significant surficial and bedrock geology unit contributing to lateral or vertical groundwater flow to a depth consistent with the scale of the hydrogeological assessment required. Delineation is considered complete when measured concentrations are consistently less than Alberta Tier 1 or Tier 2 guidelines developed using the pathway exclusion approach.

Where contaminant concentrations in soil or groundwater exceed the applicable guidelines at the property boundary, the extent of the contamination must be assessed past the property boundary.

Delineation is considered complete when sampling points in the appropriate media demonstrate compliance with the governing applicable Alberta Tier 1 or Tier 2 guidelines.

The ESA must be extensive enough to review the site information, summarize the site conditions, and update the conceptual site model. The Phase 2 ESA report must summarize the relevant site information from a risk perspective, identify issues that may pose unacceptable risks, and facilitate the evaluation of the exposure scenarios. This would include an evaluation of all APECs, COPCs, human and ecological receptors, and exposure routes, including preferential pathways. At the completion of a Phase 2 ESA, the professional must be able to conclude, at a minimum, that either:

- The ESA has provided sufficient information to support that there is no reasonable basis to suspect a substance release has occurred at the site that has caused, is causing, or may cause adverse effect; or
- The ESA has confirmed a substance release has occurred at the site, and further assessment, remedial measures or exposure control measures are required.

If the information collected through the ESA is insufficient for the professional to reach either of these conclusions, the professional, the department and/or the AER may recommend additional intrusive assessment.

### 5.3. Scope

The Phase 2 ESA must include a scope or a description of the work to be performed. The scope shall be developed by the professional and will establish the methods and work tasks that achieve the Phase 2 ESA objectives. The description must provide the rationale for sampling locations (e.g. to characterize APECs identified in a Phase 1 ESA) and testing parameters along with identification of selected methods and appropriate quality assurance/quality control (QA/QC) measures.

### 5.4. Phase 2 ESA Required Components

The main components of a Phase 2 ESA are:

- Reviewing existing Phase 1 ESA and previous Phase 2 ESAs, if any, and other background information;
- Developing a conceptual site model (CSM);
- Planning an ESA, including development of sampling plans;
- Conducting an ESA;
- Interpreting and evaluating of the data gathered during an ESA; and
- Summarizing conclusions and, at a minimum, providing interpretations of the data that will justify one of the two conclusions noted in section 5.2.

#### 5.4.1. Review of Existing Information

The following information must be reviewed during the planning phase of a Phase 2 ESA:

- Previous ESAs (the Phase 1 ESA and any previous Phase 2 ESAs) and any previous site remediation reports (information may require validation, and any limitations or inaccuracies in the previous information must be identified); and
- Any other relevant information not included in previous ESAs or remediation reports.

#### 5.4.2. Development of a Conceptual Site Model

The first step of the site characterization process is the development of a conceptual site model (CSM). The CSM must be considered dynamic in nature and must be continually updated and shared as new information becomes available (CCME, 2016; CCME, 2020).

A CSM is a visual representation and narrative description of the physical, chemical, and biological processes occurring, or that have occurred, at a site as related to the COPCs and COPCs migration. The CSM must be able to tell the story of how the site became contaminated, how the contamination was and is transported, where the contamination will ultimately end up, and whom or what it may affect. A well-developed CSM provides decision makers with an effective tool that helps to organize, communicate, and interpret existing data, while also identifying areas where additional data is required.

The conceptual site model development will be an iterative process. In the early stages of an ESA, the CSM may contain little information beyond the COPCs based on facility-specific substances and APECs. However, less detailed conceptual site models will always result in more conservative assumptions regarding the risks associated with the site. For instance, an initial Phase 2 ESA may allow for some description of the COPCs and APECs; it generally does not allow for detailed information on the source and extent of contamination at the site or transport mechanisms that are in play. At this stage, therefore, it will be difficult to rule out any potential pathways or receptors. The CSM at this stage of the ESA will be very generic and will assume more generic assumptions that already form the basis of the Alberta Tier 1 guidelines (Government of Alberta, 2024a). As site information becomes more detailed, the CSM must be progressively refined to provide information on the sources, types, and total extent of the contamination (vertically and horizontally), release and transport mechanisms, possible subsurface migration pathways, and potential receptors and the routes of exposure.

The specific elements of the CSM shall include:

- An overview of historical, current, and planned future land uses (e.g., land use types, zoning);
- A detailed description of the site and its physical setting that is used to form hypotheses about the release and ultimate fate of contamination at the site;
- Sources of contamination at the site, COPC(s), and the media (e.g., soil, groundwater, surface water, soil vapour, indoor air) that may be affected;
- The distribution of chemicals within each medium, including information on the concentration, mass, or flux;
- How COPCs may be migrating from the sources, the media and pathways through which migration and exposure of potential human or environmental receptors could occur, and information needed to interpret COPC migration, such as soil properties, geology, hydrogeology, hydrology, and possible preferential pathways;
- Information on climate and meteorological conditions that may influence contamination distribution and migration;
- Where relevant, information pertinent to soil vapour intrusion into buildings, including construction features of buildings (e.g., size, age, foundation depth and type, presence of foundation cracks, entry points for utilities), building heating, ventilation, and air conditioning (HVAC) design and operation, and subsurface utilities; and
- Information on human and ecological receptors and land usage.

The CSM must show sufficient details and be drawn to scale to realistically portray the characteristics of the site. For further information on development of CSMs, refer to CCME Guidance Manual for Environmental Site Characterization in Support of Environmental and Human Health Risk Assessment Volumes 1 to 4 (CCME, 2016).

Conceptual site model data for the whole site shall be presented both in tabular format and on a detailed site plan, which may include a photo mosaic or aerial photograph at 1:5000 scale or finer resolution. Sampling locations where COPCs exceed and meet applicable guidelines shall be clearly identified with exceedances in red and sampling points that achieve applicable guidelines identified in green on the site plan. Cross-sectional views depicting all relevant conceptual site model data including lateral and vertical delineation points and groundwater monitoring wells shall be presented.

### **5.4.3. Receptor and Exposure Evaluation**

The Phase 2 ESA must be designed to collect information that will refine the CSM and site characterization and will define the extent and concentration of any COPCs.

The Phase 2 ESA must consider, at a minimum, all of the following information:

- Current and future end land use and zoning;
- Proximity to receptors (e.g., surface water, DUAs) and setbacks;
- Soil texture, groundwater, and geology; and
- Presence of conditions requiring a mandatory Tier 2 approach.

Where a Phase 2 ESA is not specific enough to evaluate certain pathways or receptors, such as the DUA, the CSM will need to be general enough to assume these are active at the site. The more detailed the Phase 2 ESA, the more likely the CSM can be modified based on site-specific information.

#### **5.4.4. Sampling and Analysis**

Sampling must be conducted during the Phase 2 ESA in all areas where the Phase 1 ESA identified APECs, and/or has not been able to rule out COPCs or APECs.

The sampling and analysis of soil, surface water, groundwater, and sediment must be carried out using proper field methods, analytical procedures, and with the use of an accredited laboratory. For further information refer to CCME Guidance Manual for Environmental Site Characterization in Support of Environmental and Human Health Risk Assessment Volumes 1 to 4 (CCME, 2016).

##### **5.4.4.1. Media Sampling**

A Phase 2 ESA must include all pertinent media. At a minimum, soil sampling and analysis must be included. Sampling and analysis of groundwater and sediment must be conducted if COPCs migration to the groundwater or sediment cannot be clearly ruled out or if COPCs concentrations exceed Alberta Tier 1 guidelines for any of the groundwater or surface water pathways.

The media to be sampled, the locations, and number of samples to be obtained and analyzed must be identified. The location (and depth), number of samples, and suite of chemical analyses will depend upon site characteristics and must be sufficient to identify APECs and define the distribution of COPCs (e.g., delineate areas of impact and concentrations).

##### **5.4.4.2. Field Methodologies and Assessment Tools**

All field sampling methodologies including field screening, borehole drilling, monitoring well installation, trenching, and other activities used for soil, surface water, groundwater and sediment sampling must be identified. Field methodologies must be appropriate to the COPC in order to minimize loss of the COPC during sampling. This is particularly relevant for volatile COPCs or for COPCs that have ability to degrade or transform during shipping and handling where coring techniques must be used that obtain undisturbed cores and minimal handling is to be employed to ensure against contaminant loss during field sampling. Where this is not possible, documentation must be provided describing the reason for deviation and steps taken to minimize loss during sampling.

For further information, refer to Standard Practice for Design and Installation of Groundwater Monitoring Wells (ASTM, 2017), Design and Installation of Monitoring Wells (USEPA, 2018), Field Preservation of Volatile Compounds with Methanol (Government of Alberta, 2017) and Guidance Manual for Environmental Site Characterization in Support of Environmental and Human Health Risk Assessment Volumes 1 to 4 (CCME, 2016).

##### **5.4.4.3. Sampling Rationale and Design**

Sampling designs must be tailored to accommodate specific objectives of the Phase 2 ESA and the site conditions to be investigated. Clear rationale must be provided in all assessments for the medium being sampled and for each sample location. A sufficient number of sampling points must be established to clearly delineate each APEC. Sampling must extend beyond the APEC in order to achieve vertical and horizontal COPC delineation.

Sample collection, preservation, and other handling practices must be described, and appropriate techniques must be used to minimize any changes to sample composition or concentration prior to analysis. Sampling and analysis must be consistent with any available department protocols. For further information on analytical requirements when comparing against Alberta Tier 1 or Tier 2 guidelines, see the Alberta Tier 1 guidelines (Government of Alberta, 2024a).

The handling and analysis of samples must be done in accordance with standard chain-of-custody procedures to ensure that the samples are properly handled, shipped, analyzed for the appropriate parameters, received by the laboratory, and analyzed within the prescribed holding times. Sampling requirements should be discussed with the laboratory prior to sampling and incorporated into the work plan.

Where there are other sampling policies or procedures for specific activities in Alberta, those must be followed in addition to information contained in this document.

#### **5.4.4.4. Laboratory Analysis**

Laboratories to be used for chemical analysis of soil, groundwater and sediment samples must be accredited in accordance with the International Standard ISO/IEC 17025 – General Requirements for the Competence of Testing and Calibration Laboratories (ISO, 2017b) and any laboratory standards that have been developed by the conformance assessment body under Conformity Assessment – General Requirements for Accreditation Bodies Accrediting Conformity Assessment ISO/IEC 17011 (ISO, 2017a).

Analytical requirements for soil and groundwater analysis are provided in Guidance Manual for Environmental Site Characterization in Support of Environmental and Human Health Risk Assessment, Volume 4 Analytical Methods (CCME, 2016), with the exception of the specific parameters outlined in Alberta Tier 1 guidelines.

#### **5.4.4.5. Quality Assurance/Quality Control**

Quality assurance consists of the measures or checks that are put in place to confirm that the quality control activities are effective. A QA/QC program is described as the overall “management system” that ensures defined standards of quality are met within a stated level of confidence. Quality control consists of the day-to-day activities (in the field or laboratory) used to control the quality of the product or service so that the needs of the users are met.

Effective QA/QC principles and practices must be used throughout the major stages of the ESA and must address all aspects of the project, including, data quality objectives, sampling and analysis plans, data collection protocols, data quality control plans, data assessment procedures and requirements, and project quality output. A QA/QC program should be developed on a site-specific basis.

A high quality sampling program benefits from the use of field-duplicate samples. Field duplicates are collected and submitted to assess the potential for laboratory data inconsistency and the adequacy of the sampling and handling procedures. Further guidance on field duplicates sampling can be found within CCME Guidance Manual for Environmental Site Characterization in Support of Environmental and Human Health Risk Assessment. Volumes 1 to 4 (CCME, 2016).

The results of the duplicate sampling may be used to assess the adequacy of the field sampling, the heterogeneity of the sample matrix, and the laboratory analytical precision.

#### **5.4.4.6. Data Validation and Interpretation**

All findings, including nil findings, resulting from the ESA performed shall be included in the report. The report shall state the dates of the findings.

The professional must interpret the data in a clear and logical manner. Data must be compared to applicable guidelines such as Alberta Tier 1 or Tier 2 and, if required, background concentrations. COPC concentrations exceeding Alberta Tier 1 or Tier 2 guidelines must be highlighted and discussed with those that are relevant to the current known condition of the site using clearly identified figures and tables (e.g., by clearly shading out those locations that have been previously remediated or are no longer deemed representative of current known site conditions).

An initial Phase 2 ESA may identify contamination, while further ESAs may be required to complete delineation (vertical and horizontal). Where delineation is not complete, the department or AER will assume that the assessment of risk is not accurate. Delineation programs must be extensive enough in both horizontal and vertical directions to enable the proper assessment of all applicable exposure pathways and receptors. Where this includes risk to the groundwater pathway, delineation will include characterization of the surficial and bedrock geology unit contributing to lateral or vertical groundwater flow to a depth consistent with the scale of the hydrogeological assessment required. Delineation is considered complete when measured concentrations are consistently less than the Alberta Tier 1 or Tier 2 guidelines developed using the pathway exclusion approach.

Hydrogeological reporting must also include a brief discussion and interpretation of the hydrogeological site setting, including a description of local aquifers, local groundwater flow direction (vertical and horizontal) and velocity, and groundwater quality. The potential for COPC off-site migration through any pathway must be assessed and discussed.

In some cases, sampling and/or laboratory analyses of samples may indicate other impacts from potential off site COPCs originating from a site other than the one under assessment (particularly in groundwater). If this is the case, the extent of possible off-site impacts must be identified and described in the Phase 2 ESA report(s) and the report must clearly identify how the potential off-site source is shown to be distinct from sources on site. Where evidence does not clearly show the site COPC is distinct from an off-site impact, the report can only identify the possibility of an off-site source.

The report must include a discussion on the QA/QC procedures and identify and discuss any anomalies in the data.

#### **5.4.5. Conclusions**

The conclusions shall be supported by findings, including nil findings, which are documented to facilitate an understanding of the environmental quality, including the extent and degree of contamination encountered on the site. The report shall present conclusions in a manner designed to help the proponent understand the significance of the findings and methods used to reduce uncertainty in not detecting contamination when it may have been present and, where contamination is present, follow-up actions.

The conclusion section must demonstrate that the Phase 2 ESA showed:

- No evidence of COPCs in connection with the site;
- Evidence of actual COPCs in connection with the site (listed and described) and potential risk to receptor(s) both on and off the property; or
- If the information collected through the ESA is insufficient for the professional to reach either of these conclusions, further follow up to meet the site assessment objectives.

At the completion of a Phase 2 ESA, the professional must be able to conclude, at a minimum, that either:

- The ESA has provided sufficient information to support that there is no reasonable basis to suspect a substance release has occurred at the property that has caused, is causing, or may cause adverse effect; or
- The ESA has confirmed a substance release has occurred at the site, and further assessment, remedial measures and/or risk management on site and off site are required.

#### **5.4.6. Report Content**

The Phase 2 ESA report must be a stand-alone document that describes all aspects of the Phase 2 ESA program.

All items in the Phase 2 Environmental Site Assessment Checklist (Appendix A) must be addressed in the report. Rationale explaining deviations from the checklist must be included in the report, unless written authorization from the department or AER is provided to deviate from the checklist.

The date to which the conclusions relate shall be specified in the report.

A Record of Site Condition form must accompany the Phase 2 ESA report.

### **5.5. Other Regulatory Considerations**

Where other specific activities have additional regulatory requirements, these must be followed in addition to the requirements contained within this document. For example, facilities operating under EPEA Approvals and Codes of Practice, have further reporting requirements in the Soil Monitoring Directive (AENV, 2009).

## 6.0 Remediation and Confirmatory Assessment

### 6.1. Purpose and Scope

The endpoints for site remediation in Alberta are established by the Alberta Tier 1 and Tier 2 guidelines (Government of Alberta, 2024a; 2024b). The satisfactory completion of remediation work for a given land use must be supported by verification data, including confirmatory sampling and laboratory analysis of soils and groundwater. Documentation must be sufficient to demonstrate that the remediation guidelines were achieved.

### 6.2. Confirmatory Assessment Requirements

Once remediation work has been conducted, the effectiveness of the remediation measures in meeting the applicable guidelines for the site must be verified. Confirmatory sampling must be conducted as described for a Phase 2 ESA and the specific requirements described within this section. The purpose of confirmatory sampling is to verify whether or not remediation objectives have been met in each media type (e.g., soil, surface water, groundwater, sediment, etc.) where exceedances above Alberta Tier 1 or Tier 2 guidelines were identified. Samples must be analyzed using certified laboratories and laboratory analytical methods.

When developing a confirmatory sampling program for an excavation, the following minimum field requirements must be met:

- Discrete samples must be collected from each excavation face (e.g., walls and base);
- Samples must be collected a minimum of 0.05 metres from the exposed wall face. The sample must be collected from within a 0.2 metre perpendicular distance from the excavation surface;
- Discrete confirmatory samples must be collected and analyzed such that there is at least one sample within a grid based on 10 metre increments (5 metre increments for hazardous waste); and
- More closely spaced confirmatory sampling is required where there are thin identifiable soil layers that are suspected to be contaminated;

For confirmatory sampling of contaminated groundwater, a groundwater monitoring and sampling program must be designed to confirm that COPCs have been remediated to applicable Alberta Tier 1 or Tier 2 guidelines over a period of time following site remediation or source removal.

The frequency and duration of confirmatory groundwater sampling will vary depending on the COPC and site characteristics. The sampling frequency may be reduced if COPCs concentrations decrease, until the applicable guidelines are met. The minimum expectation to confirm applicable groundwater guidelines have been achieved post-remediation is three consecutive groundwater sampling events showing that samples have met the applicable guidelines in different seasons and spanning at least two years. Where remediation is conducted through the introduction of a substance into one or more wells (e.g., chemical oxidation, bio-stimulation, etc.) confirmatory samples should be taken from monitoring wells other than those used for remediation. The professional must develop a sampling program that is acceptable to the department or AER and will confirm that Alberta Tier 1 or Tier 2 guidelines are being/have been achieved.

### 6.3. Remediation Report Content

A report describing the site remediation activities must be prepared to demonstrate that the remediation guidelines were achieved. The Phase 2 Environmental Site Assessment Checklist (Appendix A) is used as a reference guide for remediation report content. The department and AER require information from previous reports to be, referenced and summarized within the remediation report. This enables the reader to quickly understand the findings from previous assessments and how contamination was addressed in the remedial phase.

The following information must be provided, summarized, and referenced to information from previous reports already submitted to the department or AER:

- Provide clear identification in the report title that it is a remediation report.
- Administrative information, including the business name of the proponent, the name and location of the site including the legal land location, the date of the report, and the name of the environmental consulting firm conducting the remediation.
- Updated conceptual site model.
- Regional and site characteristics, including, at a minimum:
  - A description and map at the appropriate scale indicating the regional setting, topography, surficial geology, soil types, vegetation, water bodies and major land use;
  - A description of the site, including topography, surface drainage, parent geological materials, soil types, fill material, vegetation, hydrogeology, depth to groundwater, groundwater flow direction, adjacent water bodies, and land use;
  - A detailed site plan, photo mosaic or aerial photograph at a scale of 1:5000 or larger, indicating major facility areas and relevant surface features.
- A summary of remedial actions taken for the APECs onsite and off-site.
- Clear identification of the remedial guidelines achieved.
- A summary of sampling and analysis including:
  - A table identifying the APECs, COPCs, sampling locations, rationale for selecting locations, method(s), and analytical suite for each sampling location, including background (control) locations;
  - The rationale for choosing the sampling procedure and depth-increments;
  - A description of the QA/QC protocol followed for sampling and handling soil and other sample media during the program; and
  - The rationale for selecting the analytical methods used and a description of relevant analytical QA/QC procedures.
- Results and discussion that include:
  - Complete tables presenting all laboratory analytical results for all sampling locations at the site as per section 5.4.2, highlighting values that are greater than baseline or valid background values, any applicable guidelines, and where applicable, clearly identifying sample locations and depths which have been removed or are interpreted as no longer representative of current condition of the site (e.g. shade/grey out);
  - A detailed site plan, photo mosaic or aerial photograph at a scale of 1:5000 scale or larger, indicating locations and depths of all sample points and area(s) remediated. Clearly identify samples which have been removed or are interpreted as no longer representative of current condition of the site (e.g. shade/grey out);
  - A detailed site plan in cross sectional view depicting all relevant conceptual site model data including excavation limits, confirmatory data, lateral and vertical delineation points, and groundwater monitoring wells;
  - A discussion on the hydrogeology and geology of the site and within an appropriate vicinity of the site;
  - A discussion of analytical results as compared to those of valid background samples and applicable guidelines for the applicable media;
  - The remediation system design and operation;
  - Quantity and volume of contaminated soil and other media remediated and left on the site and/or removed from the site;
  - Description of the location(s) where impacted media (e.g., soil, water) was moved to if taken from the site; and
  - Quantity, volume, and source of soil brought to the site for use as fill, as well as laboratory analytical results confirming that any soil imported to the site meets applicable guidelines.
- Conclusion that confirms all contamination has been identified and remediated and that the site now meets all the specific applicable environmental guidelines or provides a summary and maps that identify areas that still require further assessment, remediation and/or management as identified through this or previous assessments.

- Appendices that include, but are not limited to, borehole/soil logs for confirmatory sampling locations, and a copy of laboratory analytical data sheets.
- The date to which the conclusions relate shall be specified in the report.
- An updated RoSC form must be submitted with the confirmatory assessment/remediation report.

## 6.4. Remediation Certificates and Tier 2 Compliance Letter

Section 117 of the EPEA provides the basis for refusing an application or issuing, amending, and cancelling remediation certificates. Section 118 of EPEA provides closure of regulatory liability for a release that has been properly assessed, remediated, and has received a remediation certificate.

The Remediation Regulation further defines the remediation certificate system. Remediation certificates provide a mechanism to demonstrate when substance releases have been addressed to the satisfaction of the department and/or AER under Part 5 of the EPEA, for a defined land use. The remediation certificate process is voluntary and offers regulatory liability closure for a remediated area. A remediation certificate provides assurance that additional remediation is not required if guidelines are amended or updated. Remediation certificates are available only to sites or areas where remediation has occurred and meets either Alberta Tier 1 or Tier 2 guidelines at the time of application.

In cases where conditions on a site change to a more sensitive use, further remediation or management may be required. The person making the land use change will need to take appropriate measures to ensure that the site will meet the applicable guidelines for the proposed land use.

For residential, commercial, or industrial land uses, if contamination extends beyond the site boundaries and those surrounding areas are not fully remediated to either Alberta Tier 1 or Tier 2 guidelines, the applicant may still be eligible for a remediation certificate. This is possible if an ongoing Risk Management Plan (RMP) for the non-remediated off-site areas is accepted by the department or the AER. Regulatory closure will only be provided for the remediated portion of the site that complies with Alberta Tier 1 or Tier 2 guidelines.

For natural or agricultural land uses, if contamination extends beyond the site boundaries and those surrounding areas are not fully remediated to either Alberta Tier 1 or Tier 2 guidelines, the applicant is not eligible for a remediation certificate.

Areas where contamination identified does not exceed Alberta Tier 1 and/or Tier 2 guidelines and did not require remediation, are not eligible for a remediation certificate. There are two types of remediation certificates available:

- Limited remediation certificate that addresses only a single substance release and a single area of potential environmental concern.
- Site-based remediation certificate that addresses all contaminants of potential concern and areas of potential concern associated with the site. The site must include all associated infrastructure.

Further information on the requirements for and limitations on the application for remediation certificates is available in the Remediation Regulation and Alberta's Remediation Certificate Program (Government of Alberta, 2019b). For EPA regulated activities refer to the Alberta Limited Remediation Certificate Guide (Government of Alberta, 2019a) and Alberta Site-Based Remediation Certificate Guide (Government of Alberta, 2019c) for additional information. For AER regulated activities refer to the remediation certificate process outlined on the AER's "Contamination Closure Applications" webpage (AER, 2024a) and within AER Manual 021: Contamination Management (AER, 2021).

Section 2.5 of the Remediation Regulation (Government of Alberta, 2019d) also indicates that an application may be made for a Tier 2 compliance letter if the area of land or site meets Alberta Tier 2 guidelines and remediation was not required to meet the guideline. The Tier 2 compliance letter does not provide the same protective regulatory closure of a remediation certificate. For further information on EPA regulated activities Tier 2 compliance letters, refer to Alberta Tier 2 Compliance Letter Guide (AEP, 2019). For AER regulated activities refer to the process outlined on the AER's "Contamination Closure Applications" webpage (AER, 2024a) and within AER Manual 021: Contamination Management (AER, 2021).

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## Appendix A. Phase 2 Environmental Site Assessment Checklist

This Phase 2 Environmental Site Assessment (ESA) Checklist (Checklist) is designed for people responsible for planning ESA projects, implementing ESA programs, and carrying out the review of ESA reports to ensure the site is thoroughly assessed, the substance(s) delineated, and reports contain the appropriate information for remediation and/or risk management. Please ensure that the following information has been taken into consideration, documented, and submitted to the department. The Checklist forms the basis of the reporting requirements for Phase 2 ESA reports that must be submitted to the department or AER under the *Environmental Protection and Enhancement Act* (EPEA). For further information refer to the Alberta Tier 1 Soil and Groundwater Remediation Guidelines (Government of Alberta, 2024a) (Alberta Tier 1 guidelines), Alberta Tier 2 Soil and Groundwater Remediation Guidelines (Government of Alberta, 2024b) (Alberta Tier 2 guidelines), Alberta Exposure Control Guide (AEP, 2016), Alberta Risk Management Plan Guide (AEP, 2017) and the Supplemental Guidance on Site-Specific Risk Assessments in Alberta (Government of Alberta, 2022c).

The Phase 2 ESA report must be a stand-alone document that describes all aspects of the Phase 2 ESA program. The author(s) of the Phase 2 ESA report must provide documentation of the completed work, present and interpret the findings, and provide conclusions and recommendations that are drawn from those results.

The report shall state the dates to which all of the findings relate and identify and discuss anomalous data. All findings resulting from the investigation performed including nil findings shall be included in the report. It shall have a Conclusions section that states that the Phase 2 ESA revealed:

- No evidence of contamination in connection with the property;
- evidence of actual contamination in connection with the property (listed and described); or
- evidence of actual and potential contamination in connection with the property (listed and described); and
- potential risk to receptor(s) both on and off the property.

In addition to the information outlined within the Environmental Site Assessment Standard, the following is a list of required elements, along with a reviewer's Checklist for Phase 2 ESA reports that are submitted to the department or AER. For facilities under EPEA approval and Code of Practice, further reporting requirements in Soil Monitoring Directive (AENV, 2009) must be met.

## A.1 List of Required Information for a Phase 2 ESA Report

Section	Content
Title Page	<ul style="list-style-type: none"> <li>- A title clearly identifying it as a Phase 2 ESA report, site name, site address, municipality and legal land description, consulting company, client, and date of report.</li> </ul>
Executive Summary	<ul style="list-style-type: none"> <li>- Synopsis of the report, summary of work undertaken and key findings/conclusions.</li> </ul>
Table of Contents	<ul style="list-style-type: none"> <li>- Table of contents, figures, tables, and appendices included in the report.</li> </ul>
Introduction	<ul style="list-style-type: none"> <li>- Description of the objectives and scope of work.</li> <li>- Background information on site that includes:               <ul style="list-style-type: none"> <li>o Summary of any previous Phase 1 or Phase 2 ESA or other investigation findings for the site;</li> <li>o Summary of all preliminary work and field activities conducted at the site as part of the Phase 2; and</li> <li>o Any regulatory requirements, directions, approval requirements, environmental protection orders, or directions from an investigator or Director that apply to the site (referenced verbatim). This should be followed by information or cross reference to information that is intended to fulfill the regulatory requirements.</li> </ul> </li> </ul>
Site Characterization	<ul style="list-style-type: none"> <li>- Regional and site characteristics including:               <ul style="list-style-type: none"> <li>o Preliminary understanding of site geology and hydrogeology;</li> <li>o Description and map (at the appropriate scale) indicating the regional setting, including but not limited to legal location, topography, surficial geology, soil types, vegetation, water bodies and major land use;</li> <li>o Description of the site, including but not limited to topography, surface drainage, parent geological materials, soil types, fill material, vegetation, depth to groundwater, groundwater flow direction, adjacent water bodies and land use; and;</li> <li>o Detailed site plan, or photo mosaic or aerial photograph with a 1:5000 scale or finer resolution indicating major facility areas including waste handling areas and relevant surface features;</li> </ul> </li> <li>- Overview of the conceptual site model.               <ul style="list-style-type: none"> <li>o Description of any identified environmental issues including a description of processes or activities undertaken at the site and a listing of contaminants of potential concern (COPC) identified in earlier investigations;</li> <li>o Description of known and reported historical releases, including locations and the status of any subsequent ESA and remediation;</li> <li>o Map clearly indicating historical releases and contamination that has been delineated; and</li> <li>o Description of processes or activities associated with the substances of concern.</li> </ul> </li> <li>- Basis for choosing applicable site remediation guidelines.</li> </ul>

Section	Content
Sampling and Analysis	<ul style="list-style-type: none"> <li>- Description of buried utility clearances at the site, particularly where they are important to site assessment or contaminant migration patterns.</li> <li>- Description of all field work, including equipment used, methods of sample collection, date when work was performed, field observations, summary of samples collected (recorded in borehole logs), sample depth increment, and analyses performed, and laboratory used (described in laboratory reports).</li> <li>- Detailed site plan, or photo mosaic or aerial photograph at 1:5000 scale or finer resolution indicating all known (former and current) sampling locations and facility features.</li> <li>- Table identifying targeted facility areas, rationale for choosing the proposed sampling locations, and proposed analytical parameters for each sampling location.</li> <li>- Rationale for using selected methods including: <ul style="list-style-type: none"> <li>o Soil and groundwater quality guidelines for each COPC onsite and off-site; and rationale for using each soil and groundwater quality guideline.</li> <li>o Rationale for choosing the proposed sampling procedure(s) and depth increments;</li> <li>o Rationale for choosing the screened interval in each monitoring well;</li> <li>o Rationale for using the analytical methods and a description of relevant laboratory quality assurance/quality control (QA/QC) procedures.</li> </ul> </li> <li>- Description of QA/QC protocol followed for sampling and handling soil and other sampled media during the program.</li> </ul>
Findings	<ul style="list-style-type: none"> <li>- Presentation and discussion of analytical results (including use of graphical and tabular form, as appropriate).</li> <li>- Detailed site plan, or photo mosaic or aerial photograph at 1:5000 scale or finer resolution indicating site location, location of all sample points, sampling locations where substances of concern exceed any applicable criteria and groundwater elevation maps where applicable.</li> <li>- Analytical result tables presenting all analytical results for all sampling locations, highlighting values that are greater than background values, Alberta Tier 1 guidelines, or any other applicable criteria.</li> <li>- Evaluation and interpretation of all analytical results. Identification and description of any contaminants or wastes found at the site, potential source and concentration of the contaminant, spatial extent (horizontal and vertical) and potential pathways and receptors that may be at risk.</li> <li>- Description of potential for or known off-site migration of contamination.</li> <li>- Discussion of laboratory and field QA/QC results, including inconsistencies or anomalies in the data.</li> </ul>
Conclusions	<ul style="list-style-type: none"> <li>- Identification including the physical extent of any COPC remaining on the site above applicable remediation guidelines.</li> <li>- Description of the known physical extent of COPC that are present above applicable site guidelines.</li> <li>- Summary of risks posed by the contaminants of concern onsite and/or off-site.</li> <li>- Recommendations regarding risks posed by any contaminants remaining and whether applicable risk-based criteria have been met.</li> <li>- Recommendations for any further work along with timelines to address the exceedance on-site and off-site.</li> </ul>
Record of Site Condition	<ul style="list-style-type: none"> <li>- Completed Record of Site Condition.</li> </ul>

Section	Content
References and Supporting Documents	<ul style="list-style-type: none"> <li>- Documentation and key exhibits to support findings and conclusions including published works and guidelines.</li> <li>- All borehole logs and monitoring well installation logs.</li> <li>- Copies of all laboratory data sheets.</li> <li>- Groundwater elevation measurements (reported in tabular format or on the borehole logs) including hydrostatic zone monitored, elevations of well screen and sand pack, surveyed reference point elevation, depth to water measurement, calculated water surface elevation, thickness of immiscible layers, and where appropriate, corrected hydraulic head measurement (with discussion of the correction method).</li> <li>- Hydrogeological cross-sections for larger or more complex sites (or sites where applicable), as they illustrate the geologic materials, groundwater levels, hydraulic flow paths and contamination zones. Typically, cross-sections parallel and perpendicular to the direction of groundwater flow are necessary.</li> <li>- Groundwater contour maps for larger or more complex sites that depict groundwater flow directions and gradients for all groundwater systems found at the all borehole logs where a sampling location is drilled and a copy of laboratory data sheets in appendices.</li> </ul>
Professional Sign-off	<ul style="list-style-type: none"> <li>- Professional sign-off, with original signatures, and registration/member number or a stamp/seal confirming the findings and conclusions contained in the report, from a professional practicing member in good standing with an organization that has professional legislation in Alberta that explicitly allows them to conduct remediation and reclamation work (See Section 3.2 Responsibilities of the Professional).</li> </ul>

## A.2 Phase 2 Environmental Site Assessment Checklist

This checklist is designed to facilitate a review of the key elements of the Phase 2 ESA for practitioners and reviewers. It is important to ensure the site is thoroughly assessed, the substance(s) delineated, and reports contain the appropriate information for remediation and/or risk management. A focus of the review is to assess the completeness of the ESA, and to identify data gaps that may exist. Key technical requirements for ESAs are also itemized in the checklist, which will allow the user to identify potential deficiencies in the report and/or in the methods used to conduct the ESA. Please ensure that the following items have been taken into consideration when an ESA report is submitted to the department.

<b>A. Site Characterization</b>	
i)	Site information has been provided.
ii)	Site description has been provided.
iii)	Scaled site map(s) with north arrow(s) have been provided showing site use and features such as the current buildings, impacted and/or remediated areas, current site and adjacent land uses, natural features, receptors, and sampling locations and areas/contaminants of potential environmental concern. Surface and underground structures including utilities services must be included in the site plan.

<b>B. Receptors and Exposure Pathways</b>	
i)	The existing land use or zoning has been identified. Where zoning is identified, it has been determined that the zoning requirements correspond to receptor, land use assumptions in the EPA Tier 1 land use definition
ii)	If the future end land use is different from the existing land use, it has been identified. The site has been assessed against remediation objectives for both existing and future end land use.
iii)	The predominant soil texture has been documented based on the most conservative assumption regarding receptor risks. The lab analysis was conducted for determining soil grain size at the site.
iv)	Any site features that prevent the use of Alberta Tier 1 guidelines have been identified.
v)	All receptors as listed in Alberta Tier 2 Guidance or CCME Protocol for Derivation of Environmental and Human Health Guidelines (CCME, 2006) are identified.
vi)	All exceptions to the use of Alberta Tier 1 tables and/or exclusion of specific pathways and receptors as outlined in the Alberta Tier 2 guideline have been assessed and documented. Appropriate modifications have been made to account for these cases.
vii)	For site adjacent to a residential property, the required setback distance was applied to the remediation criteria.
viii)	The underlying Domestic Use Aquifer (DUA), if any, has been identified.
ix)	Where required for a Tier 2 evaluation, the hydraulic conductivities and gradients of all relevant soil and geological media have been determined
x)	The hydraulic connection between the underlying DUA and the contaminated zone has been identified. (see Alberta Tier 2 for more information) *
xi)	Impacts to the underlying DUA have been identified, if any**.
xii)	All onsite water wells have been identified.
xiii)	The impacts, if any, to all onsite water wells have been identified.
xiv)	All off-site water wells, within 300 metres(m), have been identified.
xv)	The impacts, if any, to all off-site water wells have been identified.
xvi)	Ground truthing of water wells within 300 m down-gradient and 100 m up-gradient of the plume has been completed.

<b>B. Receptors and Exposure Pathways</b>	
xvii)	Any seasonal and permanent surface water bodies within 300 m of the plume, as per Alberta Tier 2 guidance have been identified.
xviii)	Any cellar/basement with an earthen or bare dirt floor has been identified.
xix)	Stressed vegetation on- and off-site has been identified.

<b>C. Contaminant Assessment</b>	
<i>Is the delineation complete in both soil and groundwater?</i>	
i)	Existing information has been reviewed and used to develop an initial conceptual site model.
ii)	The features of any subsurface materials affecting transport of contaminants have been identified. (shallow water table, sand lenses, gravel, fractured bedrock, peat deposits, fill material, utility locations, etc.). Maps are provided to clearly delineate the subsurface features and locations on site.
iii)	All borehole logs and monitoring well installations are properly documented and included in the report.
iv)	Detailed site plans and cross-sections providing stratigraphic and hydrogeological information, sampling locations, and contaminant delineation have been provided.
v)	Field sampling methodologies including field screening, borehole drilling, monitoring well construction, and other activities used for sampling have been documented.
vi)	Background conditions for soil have been determined and documented in the report.
vii)	Background conditions for groundwater have been properly determined and documented in the report or delineation information clearly demonstrates that groundwater is not impacted by any contamination on site.
viii)	Contamination in the soil and geological material has been fully delineated in the vertical direction from the source until measured concentrations are less than Alberta Tier 1 or Tier 2 remediation guidelines.
ix)	Contamination in the soil and geological material has been fully delineated in the horizontal direction from the source until measured concentrations are less than Alberta Tier 1 or Tier 2 remediation guidelines.
x)	Contamination in the groundwater has been fully delineated fully in the vertical direction from the area of original contamination until measured concentrations are less than Alberta Tier 1 or Tier 2 remediation guidelines.
xi)	Contamination in the groundwater has been fully delineated fully in the horizontal direction from the area of original contamination until measured concentrations are less than Alberta Tier 1 or Tier 2 remediation guidelines.
xii)	Where a contaminant has the potential to form a free phase, free phase liquid product is identified and fully delineated in the vertical and horizontal directions. The zone of free phase contamination has been clearly identified.
xiii)	If contamination has entered bedrock, it has been identified and fully delineated in the vertical and horizontal direction.
xiv)	All analytical results have been summarized in tables or on the site plan detailing results and comparing against background conditions, Alberta Tier 1 and any other Alberta Tier 2 remediation criteria developed for the site.
xv)	All contaminants of potential concern, transformation products, and complementary parameters have been tested for all relevant media.
xvi)	Representative data/samples have been obtained through proper appropriate sampling design and methodology. There has been sufficient sampling to characterize weather, spatial conditions, and temporal variability.

<b>C. Contaminant Assessment</b>	
<i>Is the delineation complete in both soil and groundwater?</i>	
xvii)	Field QA/QC procedures have been undertaken and documented including the collection of field duplicate samples, trip blanks, equipment blanks and field blanks.
xviii)	All analytical tests have followed appropriate QA/QC practices using recommended laboratory procedures from qualified laboratories, following policies and procedures outlined by the department.
xix)	There is an adequately comprehensive description of the QA/QC program and results of data quality indicators relative to targets. Conclusions are provided on the reliability of data are based on a QA/QC program.

<b>D. Remediation Action Plan/Remediation Objectives***</b>	
i)	The purpose and objectives of the report and the remediation action plan are clearly stated.
ii)	All sources, as defined in guideline documents have been determined on- and off-site.
iii)	All sources, as defined in guideline documents have been removed completely on- and off-site.
iv)	The remediation action plan has fully accounted for all residual contamination at the on- and off-site locations that are above stated objectives.
v)	The report clearly defines the Alberta Tier 1, Alberta Tier 2 guidelines, or Tier 2 Site-Specific Risk Assessment options used. Closure state relative to both Alberta Tier 1 and Alberta Tier 2 (where implemented) have been clearly outlined and documented in the report.
vi)	On-site remediation outcome meets appropriate remediation objectives or applicable environmental standards.
vii)	Off-site remediation outcome meets appropriate remediation objectives or applicable environmental standards.
viii)	All investigation and sampling design objectives have been met.
ix)	It is noted whether further assessment to delineate the extent of vertical or horizontal contamination is required.

<b>E. Notification</b>	
i)	All impacted property owners have been identified and notified.
ii)	The affected owners/third party was provided a company and consultant contact to discuss any concerns with respect to the contamination issue.
iii)	All third party/landowner concerns have been properly documented and included in the final report.

<b>F. Reporting Requirements</b>	
i)	Phase 1 and Phase 2 site assessment reports that fulfill all guideline requirements have been provided in the attached reports
ii)	All areas of potential environmental concern and all contaminants of potential concern have been adequately investigated and clearly identified in the report.
iii)	An updated conceptual site model has been provided that integrates available information on contamination sources, migration pathways, receptors, and exposure mechanisms.

<b>F. Reporting Requirements</b>	
iv)	Where Alberta Tier 1 objectives have been employed, specific requirements as laid out in the Alberta Tier 1 guideline have been included in the report with supporting information.
v)	Where Alberta Tier 2 objectives have been employed, specific requirements as laid out in the Alberta Tier 2 guidelines have been met and supporting information is provided in the final report.
vi)	Conclusions and recommendations are clear, unambiguous, and complete.
vii)	All documentation is complete, including logs, sampling sheets, and laboratory reports including QA/QC.
viii)	Primary authors and their respective qualifications have been provided.
ix)	A completed and signed Record of Site Condition has been provided.

<b>G. Comments</b>	
	<p>Other comments:</p> <hr/> <hr/> <hr/>

**Notes:**

\* A hydraulic connection is assumed to be absent if the professional can demonstrate that there is sufficient thickness of uncontaminated, natural geologic material between the contaminant plume and the DUA based on either (see Alberta Tier 2 for more information):

- 1) a five metre thickness of massive, unfractured saturated fine-grained material, with a bulk hydraulic conductivity less than  $1 \times 10^{-7}$  m/s (Government of Alberta. 2024b.) or
- 2) an equivalent thickness of uncontaminated material supported by technical arguments prepared and accepted by the professional.

\*\* A town's reliance on municipal systems does not exclude the groundwater ingestion pathway.

\*\*\* For all sites where either administrative or engineered controls are required to protect one or more pathways for all or a portion of the contaminated material (e.g. for any exposure control or risk management scenario), refer to the Alberta Exposure Control Guide (AEP, 2016) and Alberta Risk Management Plan Guide (AEP, 2017) for further information.

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## 9.0 Appendix B - A Guide to Release Reporting

A guide to release reporting : Alberta Environmental Protection and Enhancement Act:

<https://open.alberta.ca/publications/0778509028>

To report a spill or  
environmental emergency  
call **1-800-222-6514**



## A GUIDE TO RELEASE REPORTING

*Alberta Environmental Protection and Enhancement Act*

### Alberta Environment Regional Offices

#### NORTHERN REGION

Edmonton  
#111, Twin Atria Building  
4999-98 Avenue  
Edmonton, Alberta T6B 2X3  
Tel: 780.427.7617  
Fax: 780.427.7824

#### CENTRAL REGION

Red Deer  
#304, Provincial Building  
4920-51 Street  
Red Deer, Alberta, T4N 6K8  
Tel: 403.340.7052  
Fax: 403.340.5022

#### SOUTHERN REGION

Calgary  
#303, Deerfoot Square Building  
2938-11 Street NE  
Calgary, Alberta, T2E 7L7  
Tel: 403.297.7880  
Fax: 403.297.6069

To contact your local Alberta Environment office,  
call the regional office nearest you or dial 310-0000.

**Alberta**

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## REFERENCES

*Environmental Protection and Enhancement Act,*  
R.S.A. 2000, c. E-12 (as amended)

*Release Reporting Regulation,*  
A. R. 117/93 (as amended)

*Transportation of Dangerous Goods Regulations* (SOR 2001 - 286) under the  
*Transportation of Dangerous Goods Act,*  
1992, S.C. 1992, c. 34

*Dangerous Goods and Handling Act,*  
R.S.A. 2000. D-4 (as amended)

*Oil and Gas Conservation Act,*  
R.S.A. 2000, c. 0-6 (as amended)

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***Substance***

- (i) Any matter that
  - (a) Is capable of becoming dispersed into the environment, or
  - (b) Is capable of becoming transformed in the environment into matter referred to in paragraph (a)
- (ii) Any sound, vibration, heat, or radiation or other form of energy, and
- (iii) Any combination of things referred to in subclauses (i) and (ii)

Additional definitions can be found in the *Environmental Protection and Enhancement Act* and the *Release Reporting Regulation*. These sources should be consulted to assist in the interpretation of the reporting obligations.

**This guide is not a substitute for the law. Please consult the *Environmental Protection and Enhancement Act* and the *Release Reporting Regulation* for all purposes of interpreting and applying the law.**

**In the event of a difference between this guide and the Act or Regulation, the Act or Regulation prevails.**

## DEFINITIONS

### ***Adverse effect***

Impairment of or damage to the environment, human health or safety, or property.

### ***Environment***

The components of the earth including:

- (i) Air, land and water
- (ii) All layers of the atmosphere
- (iii) All organic and inorganic matter and living organisms
- (iv) The interacting natural systems that include components referred to in clauses (i) to (iii)

### ***Owner of a substance***

The owner of the substance immediately before or during the release of the substance.

### ***Person having control of a substance***

The person having charge, management or control of the substance.

### ***Release***

Includes to spill, discharge, dispose of, spray, inject, inoculate, abandon, deposit, leak, seep, pour, emit, empty, throw, dump, place and exhaust.

## INTRODUCTION

This guide is designed to clarify the reporting requirements contained in the *Environmental Protection and Enhancement Act* and the *Release Reporting Regulation*.

The *Environmental Protection and Enhancement Act* requires that any release of a substance into the environment that could cause an adverse effect be reported to Alberta Environment.

The *Release Reporting Regulation* sets out what must be reported, when, how and to who reports must be made.

Individual approvals and codes of practice may also have requirements for reporting contraventions of the terms and conditions of an approval or code of practice, monitoring results and sampling programs. Please consult your approval or registration, or contact Alberta Environment, if you have questions about these reporting requirements.

## WHEN TO REPORT A RELEASE

Any spill, release or emergency that **may** cause, **is** causing or **has** caused an adverse effect to the environment must be immediately reported to Alberta Environment.

Prompt reporting assists in ensuring adverse impacts are addressed properly and minimized if possible, and directly affected parties are notified.

As an adverse effect may be difficult to determine, depending on the chemical and physical characteristics of the substance released and where it was released, if you are uncertain about the potential for adverse effects it is recommended that you report the release.

Releases can occur quickly, or over a long period of time. Numerous small releases can result in a potential adverse effect even if the individual release itself may not.

To be reportable, the release must be into the environment. For example, a spill that is fully contained within a building, including odours, is not considered a release into the environment. However, if there is any possibility of odours venting from the building into the environment, Alberta Environment should be notified.

- (a) the release is at or in excess of the quantities or emission levels set out for the substance in the Table in section 8.1(1) of Part 8 of the *Transportation of Dangerous Goods Regulations* (SOR 2001-286), or
- (b) the substance is released into a watercourse or into groundwater or surface water.

3(2) Subsection (1)(b) applies regardless of whether the quantity or emission level of the release is at or in excess of the levels set out for the substance in the Table in section 8.1(1) of Part 8 of the *Transportation of Dangerous Goods Regulations* (SOR 2001-286).

### **The Release Reporting Regulation**

Notice should be taken of sections 2 and 3 of the Regulation which state:

- 2 Sections 110 to 112 of the Act and this Regulation do not apply
- (a) to releases of substances that are regulated by the *Oil and Gas Conservation Act* or any regulation made under that Act, the *Dangerous Goods Transportation and Handling Act* or any regulation made under that Act, or an approval, licence or permit granted under any of those Acts or regulations, or
  - (b) to releases of substances classified as Class 1 dangerous goods (explosives) or Class 7 dangerous goods (radioactive materials) as set out in the Schedule to the *Transportation of Dangerous Goods Act, 1992* (Canada).
- 3(1) Subject to section 2(a), where a release of a substance falling within the Class set out in the first column of the Table in section 8.1(1) of Part 8 of the *Transportation of Dangerous Goods Regulation* (SOR 2001-286) under the *Transportation of Dangerous Goods Act, 1992* (Canada) occurs and the release has caused, is causing, or may cause an adverse effect, sections 110 to 112 of the Act and this Regulation apply in respect of the release only if

### **WHO SHOULD REPORT**

You must report a release if you are:

- The person who releases, causes or permits the release of the substance
- The person having control of the substance that is released (unless they have reasonable grounds to believe that the release has already been reported)
- A police officer or employee of a local or public authority who is informed of, or who investigates, a release of a substance (unless they have reasonable grounds to believe it has already been reported)
- Anyone becoming aware of the release

Local authorities should establish appropriate training and response systems and immediately notify Alberta Environment of releases.

## HOW TO REPORT

### Report Immediately

Releases must be reported to Alberta Environment at the **first available opportunity**, as soon as the person responsible knows, or should know, about the release. Reports can be made:

- By phoning **1-800-222-6514** (toll-free, 24 hours-a-day) or (780) 422-4505  
or
- In person at any Alberta Environment office

Electronic reporting may also be available in some areas. For further information please contact Alberta Environment.

### What to Report

When reporting, please provide:

- The location and time of the release
- A description of the circumstances leading to the release
- The type and quantity of substance released
- The details of any action proposed or taken at the release site
- A description of the immediate surrounding area

A reference number will be issued to confirm that the report was made.

- (3) A police officer or employee of a local authority or other public authority who is informed of or who investigates a release of a substance into the environment that may cause, is causing or has caused an adverse effect shall immediately notify the Director of the release unless the police officer or employee has reasonable grounds to believe that it has been reported by another person.

Section 111 contains the directions for the manner of reporting where a person is required to report under section 110 and may include reports in person, in writing, and by electronic means. Section 112 states that it is the duty of the person responsible for the substance to take remedial measures to remedy the release and restore the environment.

Section 107(2) of EPEA states that "Sections 110 to 112 apply only to releases of substances that are not authorized by an approval or the regulations." For example, if there was a release of a substance specifically authorized by an approval, registration or the regulations the duty to report will not apply.

## LEGISLATION

*Environmental Protection and Enhancement Act*  
Section 110 of EPEA states:

- 110(1) A person who releases, causes or permits the release of a substance into the environment that may cause, is causing or has caused an adverse effect shall, as soon as that person knows or ought to know of the release, report it to
- (a) the Director
  - (b) the owner of the substance, where the person reporting knows or is readily able to ascertain the identity of the owner,
  - (c) any person to whom the person reporting reports in an employment relationship,
  - (d) the person having control of the substance, where the person reporting is not the person having control of the substance and knows or is readily able to ascertain the identity of the person having control, and
  - (e) any other person who the person reporting knows or ought to know may be directly affected by the release.
- (2) The person having control of a substance that is released into the environment that may cause, is causing or has caused an adverse effect shall, immediately upon becoming aware of the release, report it to the person referred to in subsection (1)(a), (b), (c) and (e) unless the person having control has reasonable grounds to believe that those persons already know of the release.

## Other Required Reporting

You must also report to the following people unless you know that they are already aware of the release:

- The owner or person with control of the substance (if you know or can find out who it is)
- Your employer, supervisor or manager
- Any other person who you know, or should know, may be directly affected by the release

## Written Reports

The person responsible must submit a written report to the Alberta Environment Director within **seven days** of the initial immediate report.

The Director may waive the requirement for a written report if the immediate report was sufficient and no adverse effects are likely from the release. You may request a waiver at the time that the initial report is being made. **Unless and until the Director has granted a waiver, you must submit a written report.**

Written reports can be faxed to  
**(780) 427-3178** or mailed to:

**Alberta Environment  
Environmental Response Centre  
111 Twin Atria Building  
4999 - 98 Avenue  
Edmonton, AB T6B 2X3**

### **What Should be Included in a Written Report**

Written reports should include:

- The date and time of the release
- The location of the release
- The duration of the release and the release rate
- The composition of the release for each substance, including:
  - concentration
  - total weight, quantity or amount released
- A detailed description of the circumstances leading up to the release
- The steps or procedures which were taken to minimize, control or stop the release
- The steps or procedures which will be taken to prevent similar releases
- Any other information required by the Director

### ***What are the reportable limits for a release of polychlorinated biphenyl (PCBs)?***

Any release containing concentrations greater than 50 parts per million, or any release that has had, or may have, an adverse affect should be reported. In addition to Alberta Environment reporting requirements, the federal government also has reporting requirements for PCBs.

### ***My vehicle was involved in an accident and as a result fuel was spilled on the ground. Do I need to report this to Alberta Environment?***

Typically motor vehicle accidents are reported to a local authority. However, if the quantity of the spill exceeds 200 L, or the fuel has had, or may have an adverse effect, it must immediately be reported to Alberta Environment either by the local authority, or the person(s) involved with the spill.

***We spilled a product on the plant site and it has been fully contained. However, the product odours may drift off the site. Do I need to report this to Alberta Environment?***

Yes. The odours have a potential to cause an adverse effect and must immediately be reported to Alberta Environment.

***My company stores 205 L drums of used oil (a hazardous recyclable) in our yard. One of the drums was accidentally knocked over and the contents were spilled on the ground and soaked into the gravel. Should I report this to Alberta Environment?***

Yes. The spill has the potential to have an adverse effect on the groundwater or leave the site. This spill must immediately be reported to Alberta Environment.

***I own a service station in an industrial area that borders a residential neighborhood. While removing underground gasoline and diesel storage tanks, I discovered there was free product in the excavation. Is this reportable?***

Yes. There is a potential that groundwater aquifers and adjoining residential properties could be affected. In addition, if there are public safety concerns, the local fire department must be notified.

## **WHAT DOES NOT HAVE TO BE REPORTED**

Releases of the following substances do not have to be reported to Alberta Environment, but reporting to other agencies may be required:

- Substances released according to conditions in an approval, registration or regulation
- Substances regulated by the *Oil and Gas Conservation Act*, the *Dangerous Goods Transportation and Handling Act* or any regulations under those Acts
- Substances regulated by an approval, licence or permit granted under the *Oil and Gas Conservation Act*, the *Dangerous Goods Transportation and Handling Act* or any regulations under those Acts
- Substances classified as Class 1 (explosives) or Class 7 (radioactive materials) dangerous goods as set out in the *Transportation of Dangerous Goods Act, 1992* (Canada)

The class and division of substances regulated under the *Transportation of Dangerous Goods Act* and Regulation, and reportable quantities or levels, is available from Alberta Transportation by calling 1-800-272-9600 or (780) 422-9600.

The release of these substances is reportable when:

- The release has caused, is causing or may cause an adverse effect
- The amount exceeds the quantities or emission levels set out for the substance
- The release is into a watercourse or into the groundwater or surface water in any quantity
- The release falls under the *Transportation of Dangerous Goods Regulation* Table 1 under the *Transportation of Dangerous Goods Act, 1992* (Canada)

If you cannot tell if the quantities or levels listed in the *Transportation of Dangerous Goods Regulation* Table 1 are exceeded, the release should be reported.

***I was loading a truck with crude oil at a lease site and overfilled the tank, which resulted in approximately 500 L of crude oil being spilled on the ground. The product was contained and will be vacuumed up and no crude oil went off-site or into any waterway. Do I need to report this to Alberta Environment?***

No. However, this may be reportable to the Alberta Energy and Utilities Board. *Alberta Energy and Utilities Board IL 98-1 Oil and Gas Notification Requirements* are:

- Any release greater than 2 m<sup>3</sup> on-lease
- Any release off-lease as per the *Oil and Gas Conservation Regulations*
- Any release that has entered or has potential to enter surface water

Any spill or release that goes off-lease that has caused, is causing, or may cause an adverse effect, must immediately be reported to Alberta Environment.

**My company repaired an air conditioning system and discovered a broken line that allowed the release of HCFC-22 (R-22). We repaired the line and recharged the system. Do we need to report this release to Alberta Environment?**

Alberta Environment only requires immediate reporting of releases 10 kg or greater of Ozone-Depleting Substances, as listed in the *Ozone-Depleting Substances and Halocarbons Regulation, Alberta Regulation 181/2000*.

**Our facility is going into a shutdown and as a result we will be required to do some additional flaring. Do we need to report this to Alberta Environment?**

If the flaring causes dense black smoke of an opacity greater than 40 per cent for six minutes or more, or if the flaring exceeds an approval limit or has had, or may have, an adverse effect, it must immediately be reported to Alberta Environment. In the event none of these criteria have been exceeded but public complaints could result, please notify Alberta Environment in advance, if possible.

**Table Identified in Section 8.1(1) of Part 8 of the Transportation of Dangerous Goods Regulation**

Class	Quantity	Emission Limit
1.	Any quantity that could pose a danger to public safety or 50 kg	
2.	Any quantity that could pose a danger to public safety or any sustained release of 10 minutes or more	
3.	200 L	
4.	25 kg	
5.1	50 kg or 50 L	
5.2	1 kg or 1 L	
6.1	5 kg or 5 L	
6.2	Any quantity that could pose a danger to public safety or 1 kg or 1 L	
7	Any quantity that could pose a danger to public safety	An emission level greater than the emission level established in section 20 of the <i>Packaging and Transport of Nuclear Substances Regulations</i>
8	5 kg or 5 L	
9	25 kg or 25 L	

## WHAT HAPPENS AFTER A REPORT

Alberta Environment responds to all reports. The first priority is always to ensure that any possible adverse effects of a release are being properly dealt with, prevented if possible, or mitigated.

Alberta Environment also ensures all other appropriate authorities are notified and works with other agencies to ensure proper response efforts are underway.

After the situation is being appropriately managed and is under control, Alberta Environment gathers more information about the release incident to determine the cause of the release and how to prevent future releases.

Once the follow-up investigation is complete, a decision is made on whether enforcement action is necessary, and what that enforcement action should be.

Failure to report may result in enforcement action.

## FREQUENTLY ASKED QUESTIONS

***Do I have to report a spill of 30 L of varsol that occurred inside our warehouse but was contained and cleaned up?***

No. If all the varsol was recovered and nothing entered the sanitary or storm drainage system the spill does not need to be reported. A spill inside a building that is fully contained within the building, including odours, is not considered a release into the environment. However, if there is any possibility of odours venting from the building, Alberta Environment should be notified.

***I was digging a trench and struck a natural gas line and as a result there was a release of natural gas for a short period of time before the line could be shut-in. Do I need to report this to Alberta Environment?***

If the natural gas release poses a danger to public safety or lasted for 10 minutes or more, or the release has had, or may have, an adverse effect, it must immediately be reported to Alberta Environment.