

Remedial Action Plan Guide and Form

Remediation Technologies Symposium – 2020 Virtual Edition

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Introduction: Remedial Action Plans

- What are RAPs?
- Basic Requirements
- Technical Considerations
- Review of RAP/RSC Form
- Summary

*RAP Ingredients:
What's there?
What will be done?
By when?*

Goal of a Remedial Action Plan

- What is at the site?
 - Conditions and types/levels of contaminants at the site.
- How will the release be remediated?
 - How the release (e.g.: contaminants) will be remediated using proposed remedial measures.
- When will remediation be completed?
 - Include timelines for actions and milestones to assess progress.

***Environmental Protection and Enhancement Act
Water Act***

**Reclamation and Remediation
Regulations**

**Contaminated Sites Policy
Framework (2014)**

**Alberta Tier 1
Guidelines (2016)**

**Alberta Tier 2
Guidelines (2016)**

**Exposure Control
Guidelines (2016)**

**Risk Management
Plan Guide (2017)**

**Environmental Site
Assessment Standard
(2016)**

**Remedial Action Plan
Guide
(2020)**

Requirements



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Basic Requirements (1)

- Remedial Action Plan (RAP) submissions must include, at a minimum:
 - completed RAP Form,
 - completed RSC Form, and
 - Phase 2 environmental site assessment (aka, “ESA”).

Basic Requirements (2)

- Tracking Info, aka Reference Number
 - File number(s)
 - Incident number(s)
- Affected Third Party Property Considerations
- Delineation
 - Fully, completely
- Risk Assessment and Guideline Selection

Basic Requirements (3)

- Source Control
 - measures to ensure human health and the environment are being protected.
- Actions
 - remedial activities
 - Technologies, methodologies, requirements, limitations
- Risk Management Plan
 - under the Exposure Control Option
 - Has an RMP already been accepted?

Technical Considerations



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Technical Considerations (1)

- Guideline selection
 - What are your end goals?
- Conceptual Site Model (CSM)
 - Visualization of location
 - Part of Phase 2 ESA
- Contaminants of Potential Concern
 - What contaminants are there?
 - Where do contaminants occur?

Technical Considerations (2)

- Land use
 - Current and end land use(s)
- Source Control
 - Can re-contamination occur?
- Observation of adverse effects
 - Are there any?
 - Do any remain? (hopefully not)

Remedial Action Plan and Record of Site Condition

Streamlining the process



Why did we change the form?

- Data management and user interface
 - Record of Site Condition – MS Word version impossible to query
 - No quality control – some fields missed or filled out incorrectly
 - New version harvests data into a database, has validation rules and RAP capability

What's changed?

- Fillable .pdf with safety features
- Data is centralized and can be queried
- Streamlined
 - Fewer fields to fill out
 - Form is customized based on type of report and site
 - Includes ability to generate a blank RAP template

Filling out the form

Next steps

- Finalize and test form
- Training (live or recorded webinars)
- Guidance documentation

Main takeaway:
This is not a new requirement, just a
new form

Questions?
Comments?
Concerns?

