AER Regulatory Update
Release Reporting & OneStop RoSC

Steve Tymchyshyn, Senior Inspector, Compliance & Liability Management
Matthew Stewart, Senior Specialist, Remediation and Contamination Management
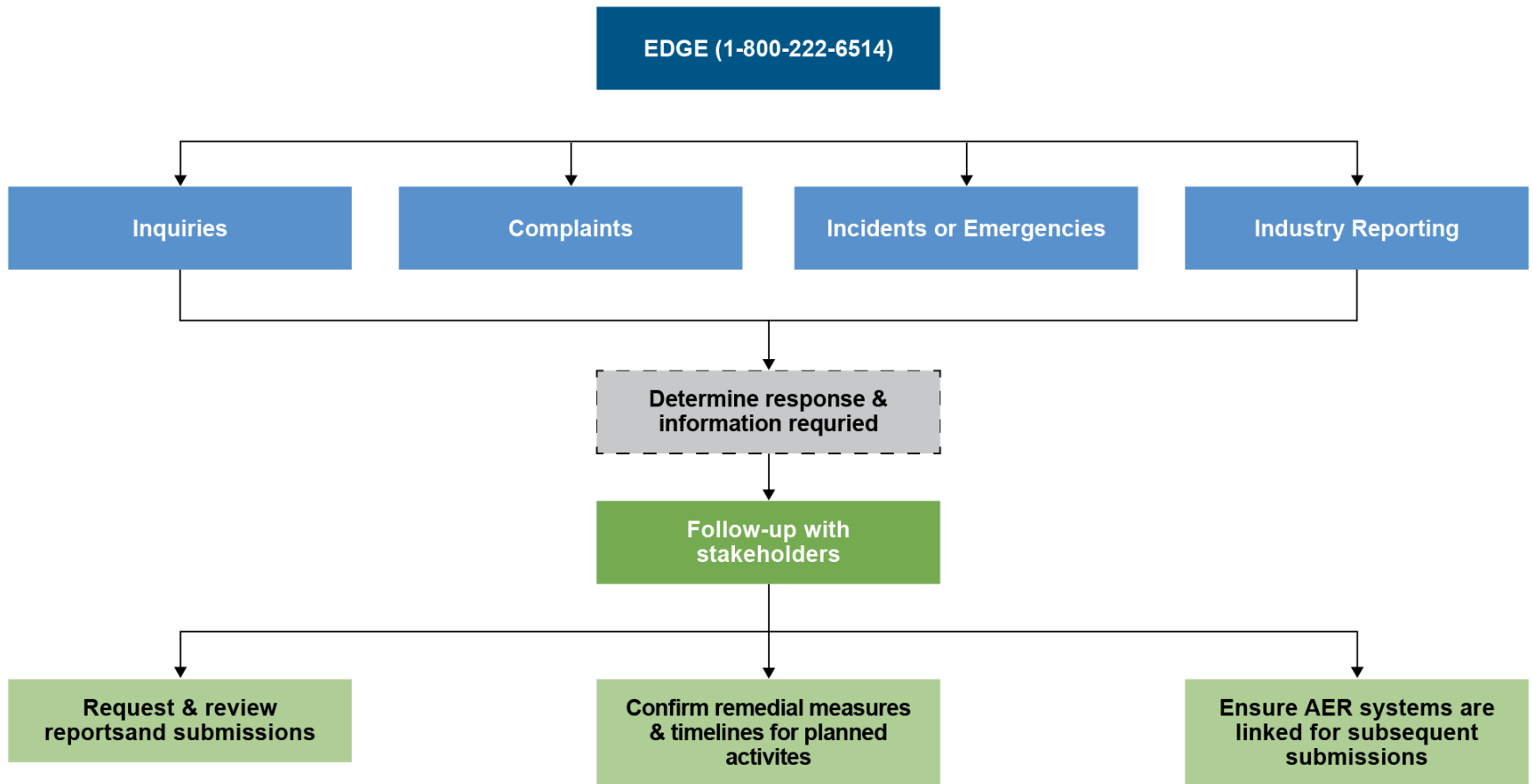
October 15, 2021

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Outline

⟩ Release Reporting refresher

⟩ Key updates to AER release reporting systems

⟩ Updated Release Report

⟩ OneStop Record of Site Condition

⟩ Questions

AER Call Management Overview

EDGE (1-800-222-6514)

- Inquiries
- Complaints
- Incidents or Emergencies
- Industry Reporting

Determine response & information requried

Follow-up with stakeholders

- Request & review reportsand submissions
- Confirm remedial measures & timelines for planned activites
- Ensure AER systems are linked for subsequent submissions
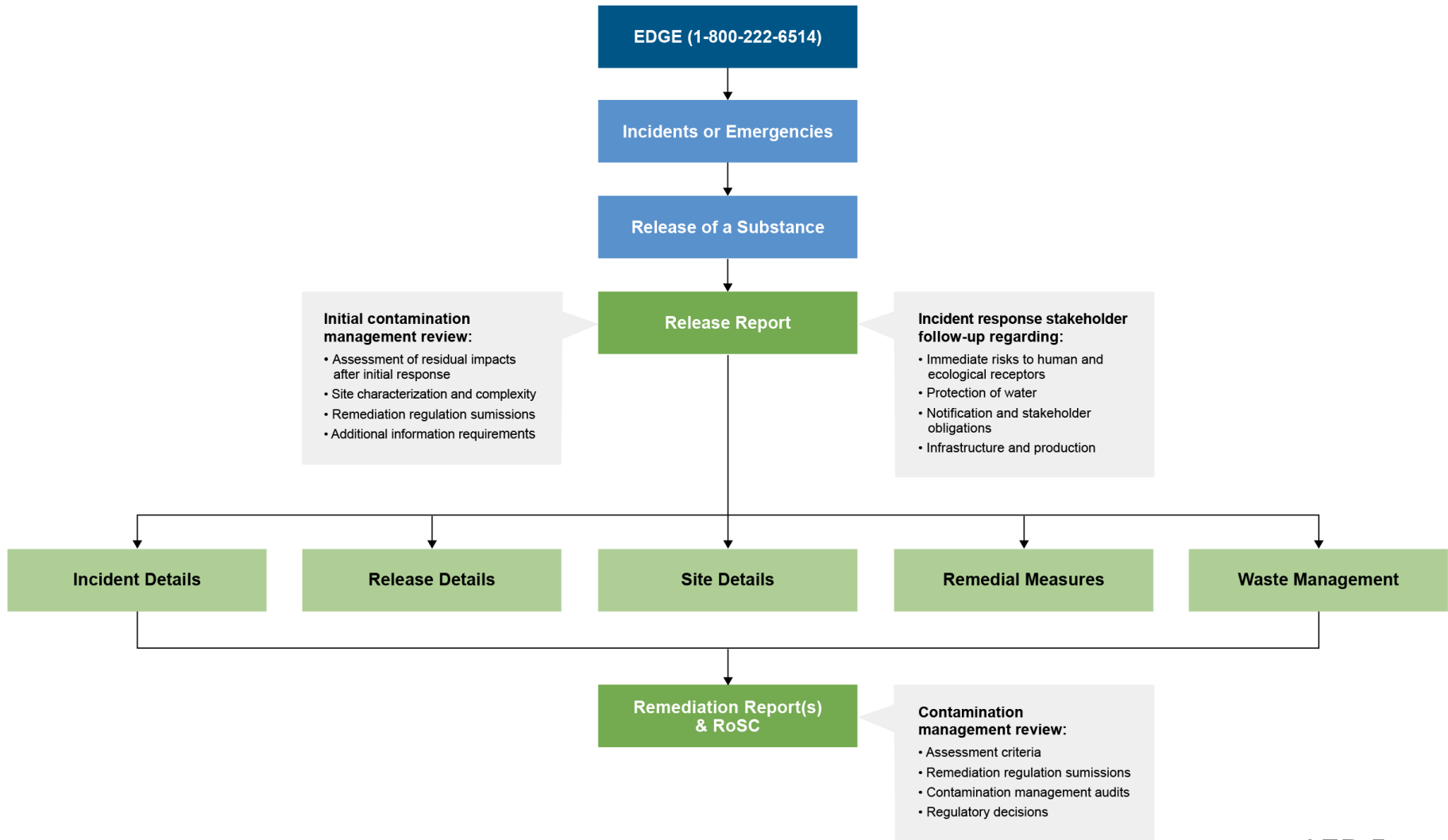
Updated Release Report: Highlights

⟩ Content revised & re-formatted to:

- Support risk-informed approach

- Enhance integration with AER RoSC;

- Minimize duplication with parallel processes

⟩ New Efficiencies

- Responds to inputs

- Mass reporting for discoveries of historical contamination
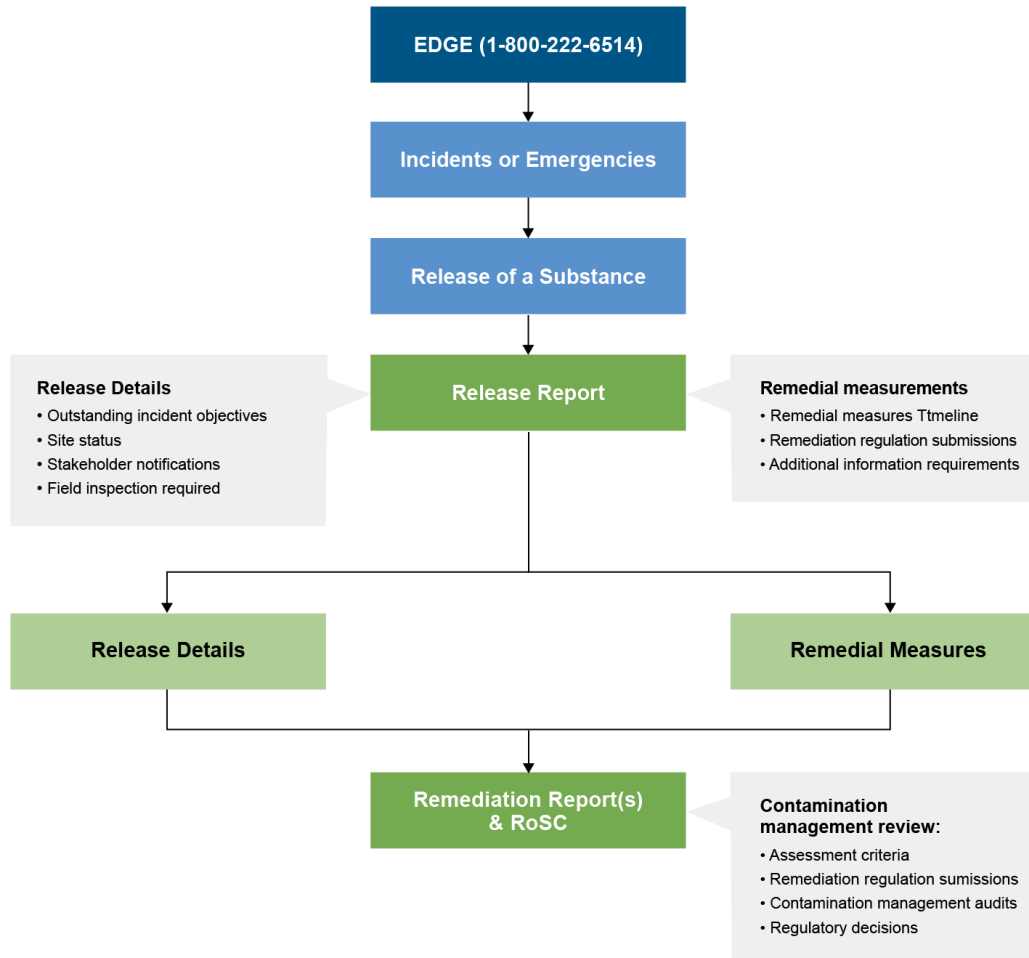
- Tool tips built into the form

Release of a Substance

Discovery of Historical Contamination

⟩ Licensee must orally report to the AER at the first available opportunity for:

- Any substance release that may cause or is causing an adverse effect
  - e.g. ESA Tier 1 Exceedances

Discovery of Historical Contamination *(Continued)*

Discovery of Historical Contamination *(Continued)*

Select all receptors potentially impacted:

☐ Wildlife   ☐ Livestock   ☐ Humans   ☐ Property   ☐ Surface water   ☐ Groundwater

☐ Protected or threatened species habitat

Describe the effect or potential effect in detail for each selected receptor:

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[Add site]

Standard and Exception

Standard Process

- All start with EDGE

Exception: Pre-2019 Unreported Substance Releases

- www.aer.ca - "Pre-2019 Substance Releases"
- Pre-2019 RAP Tool with AER approval

Record of Site Condition

⟫ Tool used throughout life-cycle of contamination management

⟫ Collects site-specific information

⟫ Contains elements of a Remedial Action Plan

Record of Site Condition

〉 In OneStop as of July 8, 2021

〉 What's New:

- Intent of Submission
- OneStop terminology specific to RoSC

Intent of Submission

⟩ Identifies which legislative role the submission fulfills

- What is the intent of submission, and

- What submission best fulfills this intent

⟩ Establishes if the submission is:

- Demonstrating compliance with the *Remediation Regulation,* or

- Seeking regulatory acceptance

Intent of Submission *(Continued)*

Contamination Identification and Characterization

- Phase 2 ESA
- Groundwater Monitoring Report
- Soil Monitoring Report
- Groundwater Monitoring Update
- Surveillance Monitoring Report

Remedial Measures

- Remedial Action Plan (RAP)
- Risk Management Plan
- RoSC and Professional Report serving as a RAP
- Ongoing reporting of an accepted RAP
- Site-Specific Risk Assessment
- Decommissioning Report
- Remediation Confirmation Report

Regulatory or Administrative Closure of Contamination

- Application for a Tier 2 Compliance Letter
- Remediation Certificate Application
- Pre-Reclamation Certificate Application Contamination Review
- Reclamation Certificate

Intent of Submission *(Continued)*

⟫ Phase 2 ESA with remedial measures

  - Required within 2 years of becoming aware or ought to have become aware of a potential for adverse effect (*Remediation Regulation*)

⟫ For the AER to systematically recognize a RAP use either of these intents:

  - Remedial Action Plan under Remedial Measures

  - RoSC and Professional Report serving as a RAP under Remedial Measures

Accepted and Returned Statuses

Accept = Administratively complete, Accepted into the system

- This does not mean "in compliance"
- This is **not** synonymous with regulatory acceptance.
- If Statutory Decision Made, Attachment indicates decision made.

Returned = Incomplete Submission

- e.g. ESA Standard not met, missing information
- Incorrect Intent (e.g. RAP but no RAP included)

TIP: Use Copy to Draft Function to re-submit

Questions with Common Errors

⟩ Related Entities: Enter ALL applicable

- Licenses, FIS (All available now), EPEA, CSU etc.

Enter at least one of the following * ⓘ

CSU File Number	EPEA Approval Number	FIS Number	WM Approval Number	Asset	Pre-2019 RAP Submission	LLD Only

⟩ Submission required by Letter of Direction or an Enforcement Order?

- Inspector request for RoSC is neither

Questions with Common Errors
(Continued)

〉 Does all analytical data collected on the site meet Tier 1?

〉 Timing of the Reclamation Certificate Application submission

〉 Indicate "Yes" if you already have an Accepted Remedial Action Plan

Does the site associated with the submission have a previously accepted remedial action plan? * | Yes | No |

Does the submission contain a request to modify the previously accepted program or plan? * | Yes | No |

More Information

⟩ www.aer.ca

- Release Reporting & Remediation Pages
- Pending Release: Contamination Management Manual

⟩ QRGs available https://www1.aer.ca/onestop/

⟩ Upcoming Training Events https://www.aer.ca/protecting-what-matters/giving-albertans-a-voice/events

? **Questions**

Thank you