

City of Richmond Planning and Development Department

Report to Committee

To:

Planning Committee

Date:

November 26, 2009

From:

Brian Jackson MCIP

Director of Development

File:

HA 09-492105

Re:

Application by Hazco Environmental Services for Demolition Permits and a

Heritage Alteration Permit for Demolition of Structures and Removal of

Hazardous Materials at 3880 Bayview Street, Zoned "Light Industrial (IL)"

Staff Recommendation

That a Heritage Alteration Permit be issued to authorize the dismantling and demolition of structures and associated infrastructure including docks, three existing trees, and the removal of hazardous materials including underground storage tanks at 3880 Bayview Street.

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Brian Jackson MCIP Director of Development

BJ:tcb

FOR ORIGINATING DEPARTMENT USE ONLY

CONCURRENCE OF GENERAL MANAGER

Staff Report

Origin

A Heritage Alteration Permit Application (HA 09-492105) has been received from Hazco Environmental Services on behalf of the owner, Imperial Oil Limited, to authorize the dismantling and demolition of warehouse and office structures and associated infrastructure including docks, three (3) existing trees, and the removal of hazardous materials including underground storage tanks at the Imperial Oil Marine Site, 3880 Bayview Street (Attachment 1), on the Cannery Channel of the Fraser River.

The proposed demolition and remediation are to be in preparation for the sale of the site. No development proposals have been received for this site prior to or after the proposed demolition and remediation. The site is situated within the OCP-Steveston Area Plan, Heritage Conservation Area, and the Land Use Designation is "Heritage Mixed Use (Commercial-Industrial with Residential & Office Above)". The site is zoned "Light Industrial (IL)".

The Heritage Alteration Permit (HAP) must be approved by Council prior to the work beginning. The applicant has applied for Demolition Permits (DA 09-493526, D8 09-493950) to cover the scope of work included in demolishing the existing structures.

Findings of Fact

On Monday, June 22, 2009, Council completed the adoption of the *Steveston Village Conservation Program* that included the establishment of the Steveston Village Heritage Conservation Area.

A Heritage Alteration Permit is required in the designated Steveston Village Heritage Conservation Area prior to:

- Subdividing lands;
- Issuing the Demolition or Development Permit(s);
- Constructing a building or structure or an addition to an existing building or structure; or
- Altering a building or structure (including building demolition) or land (including landscape features).

Scope of Work

As stated in the applicant's letter of September 17, 2009 (Attachment 2), the Permit is for the following activities only:

- removal of hazardous materials identified during building surveys
- demolition of the office and warehouse buildings
- removal of the decking, supply piping and associated infrastructure on the dock
- dismantling and demolition of dock structures
- removal of underground storage tanks
- performance of preliminary Environmental Site Assessment in the upland portion of the property
- securing the site while completing the Site Assessment
- removal of three permit-sized trees
- replacement plantings in a landscape buffer
- determining next steps

During detailed remediation, if migration of hazardous contaminants has occurred, any remediation in the road allowance will require additional legal agreements with the City of Richmond.

Surrounding Development

- To the North, across Bayview Street, is a vacant parcel, a two-storey commercial/residential building and a one-storey commercial building, all zoned "Steveston Commercial (CS2)";
- To the East is a two-storey commercial building zoned "Steveston Commercial (CS2)";
- To the South is the Cannery Channel, Steveston Island and The South Arm, Fraser River
- To the West is a two-storey commercial building zoned "Steveston Commercial (CS2)";

Analysis

The applicant has addressed technical concerns and proceeded through review and approvals from the various authorities having jurisdiction (e.g., Fraser River Estuary Management Program, Ministry of the Environment, and Vancouver Fraser Port Authority).

Fraser River Estuary Management Program (FREMP)/ Environmental Review Committee (ERC):

- The Environmental Review Committee of FREMP has provided a coordinated review (summarised in a letter dated November 12, 2008, Attachment 3) of the proposal to demolish facilities at the Imperial Oil Marina (3880 Bayview Street) on/in the Cannery Channel of the Fraser River. BC Environment, the Navigable Waters Protection Division, Fisheries and Oceans Canada, and Transport Canada have reviewed this application. Based on this review, FREMP-ERC concludes that the potential adverse impacts to fish, wildlife and their habitats associated with the proposed works can be mitigated through the application of appropriate criteria. See Environmental Programs' comments below.
- FREMP sent this application to First Nations that may have an interest in the subject area and no comments were received.

Ministry of the Environment (MOE):

Based on receipt of a satisfactorily completed site profile, the MOE has provided the necessary release (conveyed in a letter dated October 14, 2009) so that the City may proceed with the approval of the demolition permit application(s). The applicant is required to retain a qualified environmental consultant to identify, characterize and appropriately manage any soil and/or water of suspect environmental quality encountered during any excavation work at the site.

Vancouver Fraser Port Authority/Port Metro Vancouver (VFPA/PMV):

- The office building, dock decking and a portion of the walkway are located within VFPA/PMV's jurisdiction; all other foreshore structures are located in the fee simple foreshore (non- port) area that is within the City's jurisdiction.
- The applicable environmental conditions are contained in the FREMP-ERC letter dated November 12, 2008.
- VFPA staff will conduct periodic on-site visits to ensure that the proposed works are conducted as described in the application.

Heritage Conservation Area Site Planning:

- For the Heritage Alteration Permit, see Attachment 4.
- Details of the Site Landscape Plan and Site Management Plan were provided by the Applicant including ongoing site maintenance and the provision of chain-link fencing with landscaped buffer;
- After a staff review of the material submitted and of site conditions, the applicant has agreed to provide the following (Attachment 4):
 - A chain link fence for security with no privacy screening, in order to maintain unobstructed views to the Cannery Channel from the "boardwalk" and commercial premises;
 - A 1.5 m wide landscaped buffer along the Bayview frontage for the full width of the property after remediation (excluding the east vehicular entrance) to be planted with a mixture of flowering and evergreen, low-growing, drought resistant shrubs with a maximum mature height of 30 inches;
 - Maintenance (including watering as required) to ensure viable growing conditions; and
 - Existing interlocking paving on the boulevard, within or adjacent to the property line, to be maintained and replaced following remediation.

Environmental Programs:

- At no time will waste water, sediment or other potentially polluting substances be allowed to flow into the city's storm drainage catchments, surface drainage ditches or water courses, or the Fraser River. Waste materials stockpiled on site prior to removal shall be covered or have the run-off contained to control the potential runoff of hydrocarbons or other polluting substances.
- All work on site and disposal of wastes is to be done in accordance with the Environmental Management Act, including requirements outlined in the Letter from the Ministry of Environment to both Imperial Oil Limited and the City of Richmond dated October 14, 2009.

Environmentally Sensitive Area:

- There are no triggers for an ESA Development Permit as no construction or subdivision applications are being sought.
- This demolition project proposal has been reviewed by FREMP and a letter of advice has been issued outlining all the relevant requirements, best management practices and guidelines that will need to be followed. No compensation planting is being sought by FREMP.

Tree Preservation:

- Three (3) compromised native alder trees have been noted during onsite inspection.
- These trees must be removed to facilitate the scope of work. Until the site remediation is complete and future development plans are identified, tree replacement planting is not warranted.
- The applicant is required to obtain a tree-cutting permit prior to removal as part of the demolition permit application.

Financial Impact or Economic Impact

None

Conclusion

The proposed scope of demolition and remediation work, to be authorized by the Heritage Alteration Permit and required Demolition Permits, provides a significant community benefit through the remediation of environmental contamination.

Staff recommends that the Heritage Alteration Permit (HA 09-492105) be issued to authorize the dismantling and demolition of structures, three (3) existing trees, and associated infrastructure including docks, and the removal of hazardous materials including underground storage tanks, 3880 Bayview Street.

Terence Brunette Planner 2

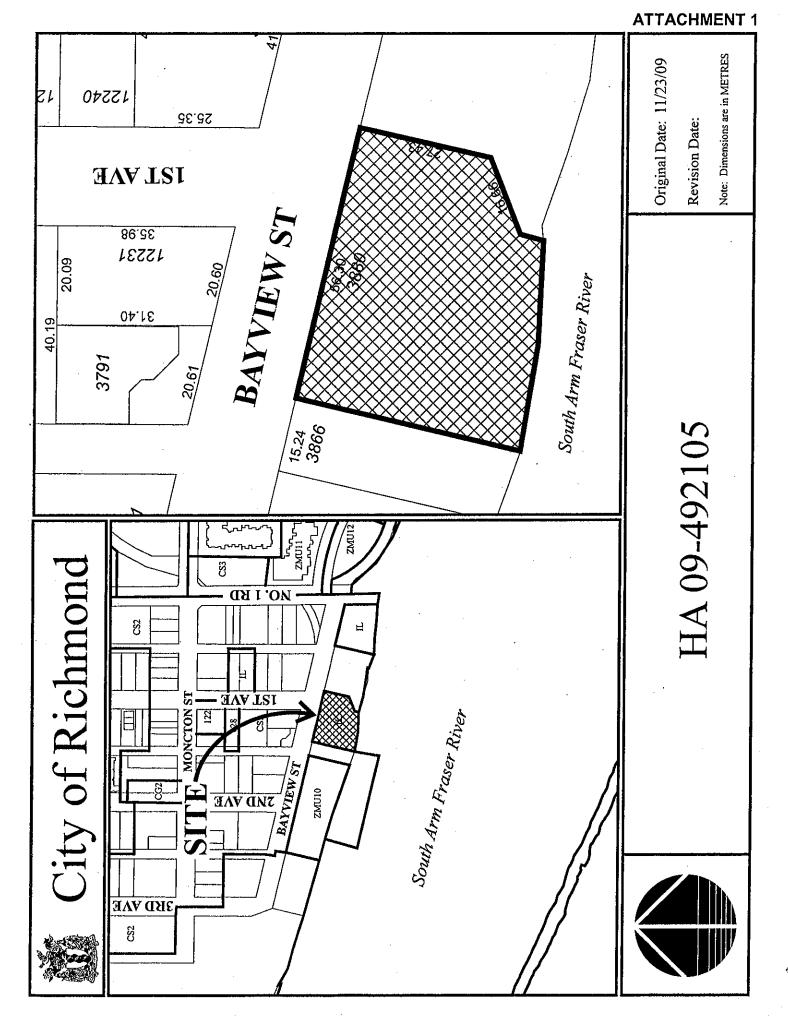
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Attachments:

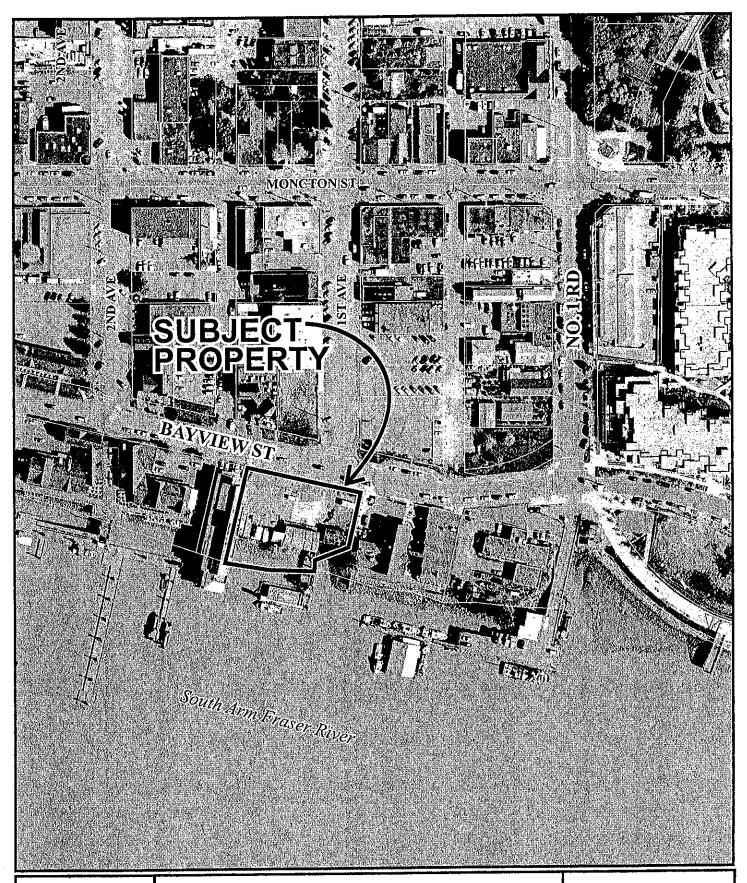
Attachment 1 Location Map & Aerial Photo
Attachment 2 Applicant's Scope of Work Letter

Verrel Duit

Attachment 3 FREMP Letter
Attachment 4 HA 09-492-105



PLN - 30





HA 09-492105

Original Date: 11/23/09

Amended Date:

Note: Dimensions are in METRES



City of Richmond 6911 No. 3 Road Richmond, B.C. V6Y 2C1 September 17, 2009

RE: Imperial Oil Marine Fuels Facility, 3880 Bayview Street, Richmond, BC

Dear Mr. Craig & Mr. Brunette,

Imperial Oil Limited has contracted HAZCO Environmental Services, a division of CCS Corporation, to demolish the former Imperial Oil facility at 3880 Bayview Street, Richmond, BC. Upon completion of the demolition phase, and in accordance with the requirements of the Environmental Management Act, environmental assessment activities will then commence to determine whether the site meets the applicable environmental standards.

Permits for this project are also in the final stages of approval from the Metro Vancouver Port Authority, and the Fraser River Estuary Management Program (FREMP). FREMP has indicated that demolition work over water is required to be completed by November 15, 2009.

The scope of proposed demolition work is as follows:

- Removal of hazardous materials identified during building surveys
- · Demolition of pile supported modular office building
- Demolition of pile supported warehouse building
- Dismantling and demolition of supported floors from the warehouse and office structures.
- Dismantling and removal of supply piping and associated infrastructure on dock
- Dismantling and demolition of dock structures.
- Removal of underground storage tanks

We would appreciate your timely review of this application, and consideration of FREMP's requirement to complete the work by November 15 of this year.

Regards,

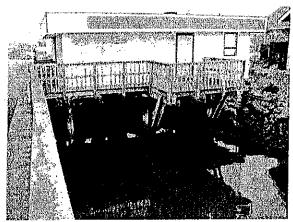
Peter Morrison Project Coordinator

HAZCO Environmental Services

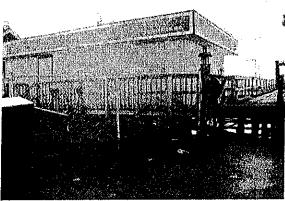
HAZCO ENVIRONMENTAL SERVICES, a division of CCS Inc. 13511 VULCAN WAY, RICHMOND, BC V6V 1K4 TELEPHONE (604) 214-7000 FAX (604) 214-7017 TOLL FREE 1-800-667-0444



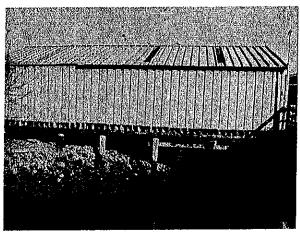
Supporting Photographs:



Office building as seen from dock.



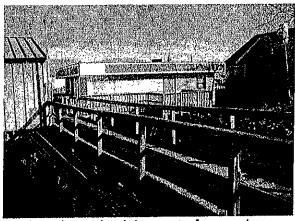
Office building as seen from Uplands.



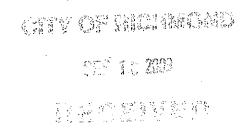
Warehouse as seen from dock.

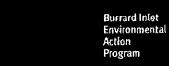


Dock seen from uplands area.



Dock and supply piping seen from water.







Fraser River Estuary Management Program

November 12, 2008

Port Metro Vancouver 400-625 Agnes Street New Westminster, BC V3M 5Y4 by email: Nures.Kara@portmetrovancouver.com

Attn: Nures Kara, Environmental Manager. Environmental Programs

Re: FREMP CPR# 0811F036; Imperial Oil Limited - Application to demolish Imperial Oil Marina, 3880 Bayview Street, Richmond, BC - Cannery Channel of the Fraser River

PROJECT REVIEW

Reference is made to the above subject application submitted to the Fraser River Estuary Management Program (FREMP) Environmental Review Committee (ERC) for a coordinated environmental review. This application has been reviewed by BC Environment, Fisheries and Oceans Canada, and Transport Canada.

Reference is also made to the letter to FREMP from J. Naus and Dr. S. Zhang of O'Connor Associates Environmental Inc. dated October 31, 2008 regarding "Demolition Work / Environmental Monitoring Imperial Oil Marina 3880 Bayview Street Richmond, British Columbia" and attachments.

From the information provided, the FREMP ERC understands that Imperial Oil Limited is proposing works to demolish facilities at the Imperial Oil Marina, 3880 Bayview Street, Richmond, BC on and/in Cannery Channel of the Fraser River. The works will primarily entail the following:

- Demolition of the office building.
- Demolition of the warehouse building.
- Removal of the dock decking.
- Performing an initial stage of environmental assessment on the upland portion of the site.
- Ensuring the site is secure while awaiting the environmental assessment results and determining next steps.

On the understanding that the foregoing points accurately reflect the subject proposal, it is the opinion of the FREMP ERC that the potential adverse impacts to fish, wildlife and their habitats associated with the proposed works to demolish facilities at the Imperial Oil Marina, 3880 Bayview Street, Richmond, BC on and/in Cannery Channel of the Fraser River can be mitigated through the application of appropriate criteria. In addition to those measures set out in the information provided, the following measures are intended to prevent or avoid any potentially harmful effects to fish, wildlife and their habitats:

- Imperial Oil Limited acknowledges that all plans and specifications relating to this application have been duly prepared and reviewed by appropriate professionals working on its behalf.

 Imperial Oil Limited further acknowledges that it is solely responsible for all planning, safety and workmanship aspects of all the works associated with this application.
- 2. The works shall be as described in this letter and as described and shown in the following documents:
 - a) The Fraser River Estuary Management Program Coordinated Project Review Common Application Form signed by P. Nicholson of Imperial Oil Limited dated October 31, 2008 and attachments.
 - b) The letter to FREMP from J. Naus and Dr. S. Zhang of O'Connor Associates Environmental Inc. dated October 31, 2008 regarding "Demolition Work / Environmental Monitoring Imperial Oil Marina 3880 Bayview Street Richmond, British Columbia" and attachments.
 - c) The Hazco Environmental Services document "Project Execution Plan IOK Steveston Marine Fueling Facility Foreshore/Marine Asset Removal & Decommissioning".
 - d) The Core Concept Consulting Ltd. Project No. 0857 "3880 Bayview Street, Richmond, BC" Drawings:
 - "Cover" Rev. 1 dated October 20, 2008.
 - "Topographic Survey" dated September 2008.
 - "Composite Site Plan" Rev. 1 dated October 20, 2008.
- 3. Imperial Oil Limited shall ensure that all work associated with the subject project complies with the requirements of the *Fisheries Act* and any other applicable laws and regulations.
- 4. It should be noted that the FREMP ERC does not have sufficient information regarding sediment/groundwater contamination at the site and, hence, any works associated with the subject proposal must not result in significant disturbance to the riverbed. With regard to piles located below higher high water (HHW), the piles must not be removed as a whole but can be cut. If the piles are cut, the top of the cut piles must remain above HHW in order to prevent a hazard to navigation.
- 5. The 2003 CCME Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (Code of Practice), contains guidelines for the decommissioning and removal of storage tank systems. It is recommended that Imperial Oil Limited follow the procedures outlined in the Code of Practice, particularly in reference to Part 9 of the Code of Practice, which provides guidelines for the withdrawal from service of storage tank systems. Associated piping not abandoned in place must be removed from service in conformance with the 2005 National Fire Code of Canada.
- 6. It is noted that environmental investigations will be completed on the uplands portion of the site in accordance with the provincial Contaminated Sites Regulation. As the extent of existing contamination is either unknown or not reported in the subject application, the FREMP ERC requests confirmation of the extent of soil contamination upon completion of the environmental investigation work. Further, although environmental investigation works will be undertaken on the upland, Port Metro Vancouver should consider whether there is the potential for sediment / groundwater contamination within the water lease fronting the subject property and, if so,

Port Metro Vancouver FREMP CPR# 0811F036 November 12, 2008 Page 3 of 5

undertake or direct the lease holder to undertake environmental investigation works and any necessary remedial actions.

- 7. The disturbance to vegetation is to be kept to an absolute minimum.
- 8. Land-based equipment or machinery shall only operate from the upland and not from within the intertidal foreshore or waters of the Fraser River.
- 9. Water-based machinery or equipment (e.g., barges, etc.) shall be located and firmly moored in deep water, far enough offshore to prevent any grounding on the foreshore or bed of the Fraser River. The only exception to this condition is that use may be made of vertical spuds to hold barge(s) in place.
- 10. All demolition wastes or debris generated by the works shall be appropriately contained in the immediate work area, collected, and appropriately disposed of in accordance with all applicable legislation, guidelines, and best management practices.
- 11. The release of sediment or sediment-laden water into the aquatic environment is to be minimized during the works. In this regard, the works should address the applicable water quality criteria as described in the British Columbia Water Quality Guidelines (Criteria): 2006 Edition produced by BC Ministry of Environment.
- 12. All work and activities at the site must be carried out such that there is no discharge, either direct or indirect, of paint, cleaning solvents, construction waste, excavation waste, overburden, soil, dewatering effluent, oil, grease or any substances deleterious to aquatic life onto the foreshore of or into the waters of the Fraser River.
- 13. There should be no fuelling on or adjacent to the foreshore associated with the proposed works.

 All petroleum products (e.g., fuel, oil, lubricants), used in association with the construction of the subject works should be stored and handled at an appropriate upland location and in compliance with all applicable legislation, guidelines, and Best Management Practices.
- 14. There shall be an appropriate fuel and oil spill prevention/contingency plan is in place prior to work commencing and appropriate spill containment and cleanup supplies are to be at hand whenever the subject works are underway.
- 15. All works shall be carried out in such a manner so as to avoid any adverse impact on fish or fish habitat. If the harmful alteration, disruption or destruction of fish habitat occurs, the works will be in contravention of Section 35 of the Fisheries Act. If such impact occurs Fisheries and Oceans Canada reserves the right to immediately suspend or alter operations and the proponent shall undertake, at their own expense, any compensatory and/or remedial works deemed necessary by Fisheries and Oceans Canada to ensure a "no net loss" in the productive capacity of local fish habitat.
- 16. Imperial Oil Limited should be reminded of its obligation to comply at all times with Section 36 of the *Fisheries Act*, which specifically prohibits the deposit of a deleterious substance into fish-bearing waters. Due diligence is required at all times to prevent such a deposit, and implementation of the mitigation measures in this letter does not in itself relieve Imperial Oil Limited of this ongoing obligation.

Port Metro Vancouver FREMP CPR# 0811F036 November 12, 2008 Page 4 of 5

- 17. The Fisheries and Oceans Canada Field Supervisor, Conservation and Protection in Steveston, BC (tel. 604-664-9250 or fax 604-664-9255) is to be notified at least five (5) days prior to the commencement of the works. Notification may be sent by fax.
- It is understood that by proceeding with these works, Imperial Oil Limited and/or its agents and/or contractors shall have indicated that they understand and have agreed to the foregoing conditions. In this regard, a copy of this letter regarding this project is to be provided to any contractor(s) prior to work commencing. In addition, a copy of this letter is to be retained on site at all times when the subject works are underway.
- 19. It should be noted that this proposal submitted to the FREMP ERC for environmental comment is also reviewed by the Navigable Waters Protection Division to determine navigational issues pursuant to the Navigable Waters Protection Act (NWPA). If additional information is required to complete the navigation impact assessment, the area officer may contact the proponent directly.
- 20. It is recommended that Imperial Oil Limited and/or their representatives determine if the proposed activities conflict with sites protected under the Heritage Conservation Act. Project representatives may make a data request for site information to the Provincial government using the following link:

 http://www.tsa.gov.bc.ca/archaeology/requesting_archaeological_site_information/index.htm.
 Responses to data requests take approximately 30 days.

 Should you require a more immediate response, a qualified professional archaeologist may be

Should you require a more immediate response, a qualified professional archaeologist may be engaged to determine if recorded, protected archaeological sites are located within your application area. Listings of consulting archaeologists are found through the BC Association of Professional Consulting Archaeologists website at http://www.bcapca.bc.ca.

This letter of advice is valid until November 15, 2009. After this time, if the subject works have not been completed, this letter will be void. This will ensure that the proposed works will conform to current habitat management policy, guidelines, and legislation.

If any of the above points are inaccurate or misleading, please advise at your earliest convenience as the FREMP ERC may wish to modify the comments herein.

Please note that this letter of advice should not be taken to imply approval of the subject works in accordance with the habitat protection provisions of the *Fisheries Act* or any other federal or provincial legislation. If harmful alteration, disruption or destruction of fish habitat occurs as a result of a change in the plans for the subject proposed works, or failure to implement the additional measures specified above, contravention of subsection 35(1) of the *Fisheries Act* could occur.

The above comments and recommendations are based solely upon consideration by the FREMP ERC member environmental agencies of the potential environmental issues associated with this project. It is possible that the FREMP ERC may subsequently be made aware of legitimate environmental or other concerns held by others. Any such additional comments that may be received will be forwarded to you for your appropriate consideration. All non-environmental issues must be addressed directly with the responsible authorities. In particular, proponents are advised to make relevant municipalities aware of their projects prior to commencing works as these municipalities may have concerns and/or requirements on such matters as planning, zoning, roadway and services access, and parks and recreation.

Should you have any questions or require further information, please do not hesitate to contact me at Tel: 604.775.5756.

Port Metro Vancouver FREMP CPR# 0811F036 November 12, 2008 Page 5 of 5

Sincerely,

FREMP Environmental Review Committee

Per: Angela Mayes

Project Review Coordinator

Cc: B. Naito, Fisheries and Oceans Canada (via email)

M. Willcox, BC Environment (via email)

B. Magee, Transport Canada NWPD (via email)

DFO C&P Field Supervisor Steveston (Facs: 604-664-9255)



City of Richmond

Heritage Alteration Permit

No. HA 09-492105

To the Holder:

CITY OF RICHMOND

Property Address:

3880 BAYVIEW STREET

Legal Description:

Lot: 22 SECTION 10 BLOCK 3 NORTH RANGE 7 WEST NEW

WESTMINSTER DISTRICT REFERENCE PLAN 26081

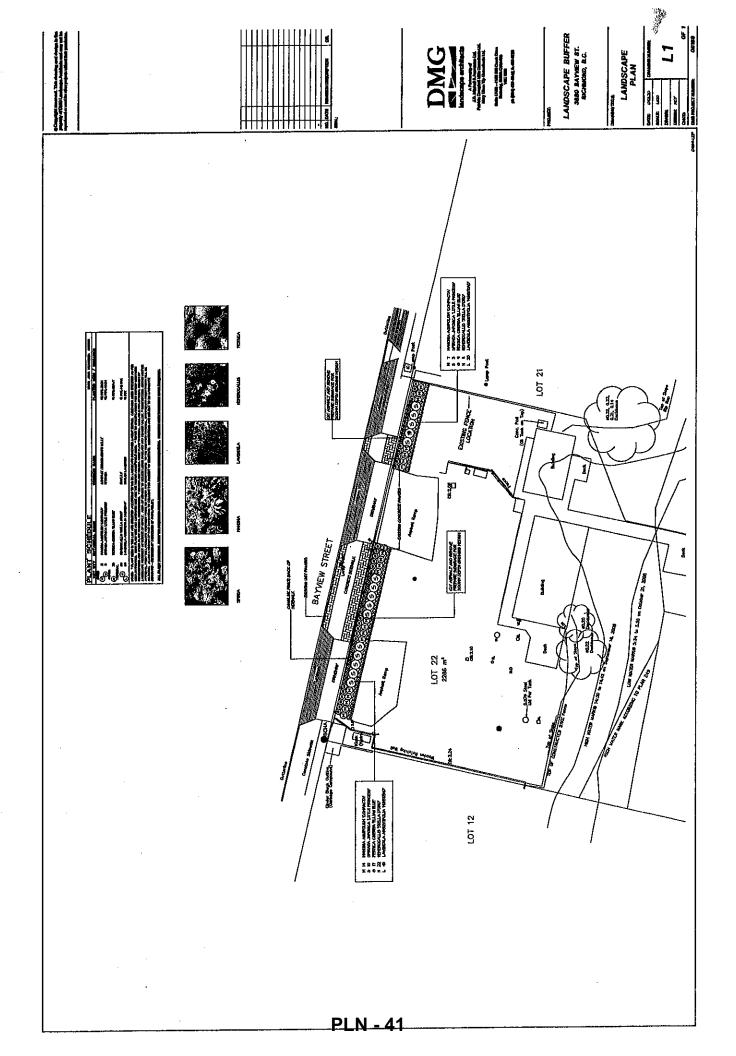
(s.972, Local Governmen	t Act)	
1. (Reason for Permit)		Designated Heritage Property (s.967)
		Property Subject to Temporary Protection (s.965)
		Property Subject to Heritage Revitalization Agreement (s.972)
		Property in Heritage Conservation Area (s.971)
		Property Subject to s.219 Heritage Covenant

- 2. This Heritage Alteration Permit is issued to authorize the dismantling and demolition of structures and associated infrastructure including docks, and the removal of hazardous materials including underground storage tanks, at 3880 Bayview Street.
- 3. This Heritage Alteration Permit is issued to authorize the removal of three (3) permit-size native alder trees, and provide replacement plantings (1.5 m landscape buffer) as per the Site Landscape Plan to be effected at a later date after site remediation. A Site Landscape Plan and Site Management Plan have been attached to and form a part of this Heritage Alteration Permit.
- 4. A Letter of Credit in the full amount of the planting, labour and materials is to be provided as security to ensure performance of landscaping required for screening.
- 5. This Heritage Alteration Permit is issued subject to compliance with all of the Bylaws of the City applicable thereto, except as specifically varied or supplemented by this Permit.
- 6. If the alterations authorized by this Heritage Alteration Permit are not completed within 24 months of the date of this Permit, this Permit lapses.

ATTACHMENT 4

AUTHORIZING RESO DAY OF	DLUTION NO.	ISSUED BY THE COUNCIL THE
DELIVERED THIS	DAY OF	•
MAYOR		CORPOR ATE OFFICER

IT IS AN OFFENCE UNDER THE LOCAL GOVERNMENT ACT PUNISHABLE BY A FINE OF UP TO \$50,000 IN THE CASE OF AN INDIVIDUAL AND \$1,000,000 IN THE CASE OF A CORPORATION FOR THE HOLDER OF THIS PERMIT TO FAIL TO COMPLY WITH THE REQUIREMENTS AND CONDITIONS OF THE PERMIT



Imperial Oil Limited Remediation and Reclamation Services Suite 405, 5945 Kathleen Ave. Burnaby, BC V5H 4J7

November 23, 2009

City of Richmond 6911 No. 3 Road Richmond, BC V6Y 2C1

Re: Permit Applications (DA 09-493526, D8 09-493950 and HA 09-492105) for 3880 Bayview Street

Attention: Mr. Terrence Brunette

Planner - Urban Development Division

Dear Mr. Brunette:

In accordance with your request, this letter provides confirmation that Imperial Oil will install and maintain a landscape buffer, as follows, at our former Marine Fuels facility located at 3880 Bayview Street:

- 1. Imperial will retain a contractor to maintain the landscape border on a scheduled basis and water as necessary to maintain the plants.
- 2. Maintenance of the landscape buffer will include replacement of plants that do not survive.
- 3. Imperial will maintain the landscape buffer until the property has been transferred/sold to another party.

I trust this letter meets your requirements as stated in your correspondence to date. If you require additional information please do not hesitate to contact by telephone at 604-842-9666.

Yours truly,

Peter Nicholson Project Manager



Oct 9, 2009

Imperial Oil Ltd. 5945 Kathleen Äve. Suite 405 – Metrotown Place III Burnaby, B.C. V5H 4J7

Attention:

Mr. Len Appel

Len.

HAZCO Environmental Services, a division of CCS Corporation has prepared this Site Management Plan in response to a request from Terence Brunette of The City of Richmond (Re. email dated Oct 6, 2009). This Site Management Plan is required as a supplement the City of Richmond Heritage Alteration Permit Application to indicate interim and long-term site management measures. This Site Management Plan also complies with other permits required for this project which include:

- Vancouver Fraser Port Permit 2009-004
- Fraser River Estuary Management Program CPR#011F036
- City of Richmond Demolition Permit (pending)

SITE MANAGEMENT PLAN

The Site Management Plan will be focused on ensuring the property is kept in a safe, secure and tidy condition before, during and after demolition, assessment and potential remediation activities. It is anticipated that demolition and assessment activities will commence in November 2009 (permits pending) and carry through 2010. A final schedule for the complete assessment and remediation (if required) will be evaluated following results obtained during the demolition and initial assessment phases of the project. The site management measures during these phases will include the following:

Pre-demolition & Assessment

- Bi-weekly inspections by a qualified security contractor with observations documented and reported to HAZCO while superstructures are present.
- Maintenance of grounds to remove debris, cut grass and address other issues as required.
- Signage will be placed on the fence at all times with site and emergency contact information.

Demolition, Assessment and Remediation

- Privacy screening will be installed on the chain link fencing adjacent Bayview Street.
- Signage will be placed on the fence at all times with site and emergency contact information.

HAZCO ENVIRONMENTAL SERVICES, a division of CCS Corporation 13511 VULCAN WAY, RICHMOND, BC V6V 1K4 TELEPHONE (604) 214-7000 FAX (604) 214-7017 TOLL FREE 1-800-667-0444



All excavations to be backfilled compacted and graded to maintain surface groundwater flow patterns and minimize sediment migration.

Post-demolition, Assessment and Remediation

Installation of parameter chain link fence.

Signage will be placed on the fence at all times with site and emergency contact information.

Maintenance of grounds to remove debris, cut grass and address other issues as required.

We look forward to the opportunity to work with you on this project. Please don't hesitate to contact me with any questions or comments.

Regards,

1

Matthew Nikkinen Project Manager

HAZCO Environmental Services