

Implementation of Updated Atlantic RBCA Environmental Quality Standards (EQS)/Pathway Specific Standards (PSS) (July 2021, updated July 2022) and Release of Updated Atlantic Risk Based Corrective Action (RBCA) for Impacted Sites in Atlantic Canada User Guidance (July 2021, updated July 2022)

Introduction

This document recognizes the release of updated Atlantic RBCA EQS/PSS (with associated updated rationale document) and clarifies implementation procedures. A summary of Changes to Atlantic RBCA Environmental Quality Standards Rationale and Guidance Document (and associated tables) is provided at the beginning of the updated rationale document.

It is noted however, that the four Atlantic Provinces may independently determine how and when to apply and implement the updated Atlantic RBCA EQS/PSS within their individual Provincial impacted site management processes, programs, and policy frameworks. At the discretion of the individual Atlantic Provinces, this may include modifications to the updated Atlantic RBCA EQS/PSS.

This document also recognizes the release of updated Atlantic RBCA for Impacted Sites in Atlantic Canada User Guidance. A summary of Changes to Atlantic RBCA V4 User Guidance Document is provided at the beginning of the updated user guidance document.

The updated Atlantic RBCA for Impacted Sites in Atlantic Canada User Guidance and the updated Atlantic RBCA EQS/PSS can be downloaded from the Atlantic RBCA website (www.atlanticrbc.com) or provided by Atlantic PIRI Regulators upon request. Atlantic PIRI Regulators contact information is available under the “Contact Us” link on the Atlantic RBCA website (www.atlanticrbc.com).

Implementation Procedure

Check with your local regulatory jurisdiction on implementation of updated Atlantic RBCA EQS/PSS (July 2022). In the absence of specific jurisdictional approach, Atlantic PIRI recommends the following procedure:

Effective **August 1, 2022**, assessment, remediation, and closure reports must utilize the updated Atlantic RBCA EQS/PSS (as adopted in ministerial protocols and other relevant guidance and regulatory instruments developed by the four Atlantic Provinces) except for the following circumstances:

1. **Environmental Site Assessment was completed** using 2021 Atlantic RBCA EQS/PSS and/or other regulatory guidelines/standards predating the release of updated Atlantic RBCA EQS/PSS (July 2022), but a report was not submitted to the Regulator. In these cases, assessment reports must be submitted to the Regulator on or before January 31, 2022. If not received prior to this deadline, the Regulator will require a re-evaluation using updated Atlantic RBCA EQS/PSS (July 2022), as warranted within applicable regulatory jurisdiction.
2. **Remediation was completed** using 2021 Atlantic RBCA EQS/PSS and/or other regulatory guidelines/standards predating the release of updated Atlantic RBCA EQS/PSS (July 2022), but a

report was not submitted to the Regulator. Similarly, in these cases, assessment reports must be submitted to the Regulator on or before January 31, 2022. If not received prior to this deadline, the Regulator will require a re-evaluation using updated Atlantic RBCA EQS/PSS (July 2022), as warranted within applicable regulatory jurisdiction.

3. **Remediation is on-going** using 2021 Atlantic RBCA EQS/PSS and/or other regulatory guidelines/standards predating the release of updated Atlantic RBCA EQS/PSS (July 2022). Site Professionals and Person(s) Responsible may utilize either version and/or other regulatory guidelines/standards, but ensure the site is evaluated and remediated using only one version. Regardless, ongoing remediation using 2021 Atlantic RBCA EQS/PSS and/or other regulatory guidelines/standards predating updated Atlantic RBCA EQS/PSS (July 2022) must be completed and reported by July 31, 2023. Otherwise, updated Atlantic RBCA EQS/PSS (July 2022) must be used for site remediation (as warranted within applicable regulatory jurisdiction).

4. If site remediation is completed and acknowledged by the Regulator using 2021 Atlantic RBCA EQS/PSS and/or other regulatory guidelines/standards predating the release of updated Atlantic RBCA EQS/PSS (July 2022), but requires a future re-evaluation, such re-evaluation must be completed using regulatory guidelines/standards applicable at the time of re-evaluation. Site Professionals are required to ensure Person(s) Responsible, site owners, and subsequent owners are made aware of this issue in closure documentation. Examples of this situation could involve land transactions which require reassessment of site conditions or changes in land use.