



February 8, 2017

Gibsons Alliance of Business and Community Society (GABC)
c/o William J. Andrews, Barrister and Solicitor
1958 Parkside Lane
North Vancouver, BC V7G 1 X5
Via Email

Dear Mr. Andrews:

**Re: Site Profile Submission – Site Decommissioning
377 to 407 Gower Point Road and 689 Winn Road, Gibsons, BC
PIDs: 007-359-870, 007-357-829, 011-118-202, 011-118-211, and 011-117-524
Site 16759**

This letter is to acknowledge receipt of your February 6, 2017 letter, received via email, regarding the property at 377 to 407 Gower Point Road and 689 Winn Road, Gibsons, BC (the Site). Keystone Environmental Ltd. has been retained by the Site's Owner to obtain a British Columbia Ministry of Environment (BC MOE) Certificate of Compliance (CofC) for the Site. As part of that requirement, soil, groundwater, vapour and sediment contamination that may be present at the Site must be investigated, delineated and remediated in accordance with the requirements of the BC Contaminated Sites Regulation (CSR).

While tributyl tin (TBT) is not regulated under the CSR, the BC MOE it is standard environmental consulting industry practice in BC to assess TBT in sediments where its use is suspected against the Puget Sound Dredge Disposal Analysis (PSDDA) screening level. As part of our investigations of the sediments at the Site, TBT in sediments have been assessed against this screening level and will be addressed as part of the CofC application. If Dr. Sobolewski can provide UTM coordinates for his sample locations and a copy of the laboratory analytical report that is signed by a Professional Chemist we will include his data into our data set.

Dr. Sobolewski's comments regarding the requirement for a Site Profile are in error. As the Town of Gibsons opted out of the CSR process a Site Profile is not required. However, the Site Profile was provided by the Site owner to the BC MOE, in good faith, to keep the BC MOE apprised of the project's progress.

Under the CSR, the classification of Site risk must be evaluated in accordance with the requirements of *Protocol 11: Upper Cap Concentrations of Substances* and *Protocol 12: Site Risk Classification, Reclassification and Reporting*. As TBT is not a listed substance under Protocol 11, it cannot trigger high risk status under the CSR as per Protocol 12.

As it is the intention of the Site Owner to meet the requirements of the Contaminated Sites Regulation and obtain a Certificate of Compliance for the Site, I have been advised that further discussion is not necessary.

Sincerely,

Keystone Environmental Ltd.

Michael Geraghty, M.Sc., P.Geo., PMP
Senior Technical Manager

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cc: Klaus Fuerniss, Klaus Fuerniss Enterprises
Andre Boel, Town of Gibsons
Emanuel Machado, Town of Gibsons
Vincent Hanemayer, Ministry of Environment