

December 22, 2015

File No.: 00141934

Mr. Greg Paliouras
Divisional Vice-President,
Construction, Energy and Maintenance
Sears Canada Inc.
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Dear Mr. Paliouras:

**Subject: Follow-up to Meeting on November 25, 2015
Sears North Hill and Hounsfeld Heights – Briar Hill Community
1616 - 14 Avenue NW Calgary, Alberta**

Alberta Environment and Parks (the Department) met with Alberta Health Services, Clifton Associates (Clifton), and Intrinsic Environmental Sciences on November 25, 2015. We appreciated the update on the environmental investigation work that has been conducted on and off site the past year and a half.

At the November 25th meeting the Department understands that Clifton made the following commitments:

- Provide the draft reports for the environmental investigation work and risk assessment in early December (received).
- Provide the Department with the opportunity to review draft newsletters before they are sent to the community.
- Contact the concerned resident within a week and offer to meet with the resident.
- Submit an annual report by March 31st of each year starting in 2017 for the work done in the prior calendar year.
- Submit a report for groundwater monitoring events completed in 2015.
- Submit a Remediation Plan for the community in the first quarter of 2016.
- Advise the Department of the submission date for a Soil Vapour Sampling Plan, and will implement that plan in 2016.
- Further delineation of contaminants in the soil and groundwater off site, especially in the south and southwest portions of the community where there is greater uncertainty on risks.
- Further investigation of the geology to add to the understanding of the contaminant transport.

In the meeting the Department discussed our additional requirements going forward, as follows:

Schedule of Work and Reporting

Annual Report

- The Department requires ongoing submission of annual reports for all work completed from January 1 through December 31. The annual report will be submitted by March 31

of the following year. The first annual report is due by March 31, 2017. The annual report will include, at a minimum, all of the following:

- Communication:
 - a summary of the communication approaches used,
 - the contents of the communications,
 - a list of any concerns that arose from other parties,
 - an explanation of how these concerns were addressed, and
 - any recommended changes to improve communication;

- Environmental Work:
 - A description of all assessment, remediation, and monitoring work undertaken;
 - the results of such work and it's interpretation,
 - an update to the conceptual site model,
 - details on how the remediation system(s) operate and an evaluation of their effectiveness,
 - identification of data gaps with recommendations to address them, and
 - recommendations and commitments for future assessment, monitoring and remediation work.

Quarterly Reports

- The Department will require a quarterly update to the Clifton work schedule every three months starting March 31, 2016. The Department notes that in the past Clifton/Sears have often failed to achieve milestones within the time stated, and as such the timelines in the schedule may not have been realistic. We require the timelines in the work schedule to be followed for both the activities committed to by Sears and Clifton, and as required by the Department. Also required is an explanation for any activities that are not on schedule.

Immediate Reporting

- Should any results during the year indicate the potential for increased risk beyond what has been identified in the current risk assessment, this must be reported to the Department and Alberta Health Services immediately.

Communication

- Clifton is providing comprehensive service from a technical point of view. The Department feels however, that the quality of communications with the community needs to be improved. The Department recommends that Sears/Clifton work with an experienced risk communicator as a step towards enhancing communications with the community and other stakeholders.
- Both an appropriate summary of information, and the actual reports, should be readily available to any interested members of the public on a website.

Environmental Investigations and Risk

In the meeting, Clifton provided a comprehensive overview of activities, with emphasis on the past year and a half. Generally the Department is supportive of the next steps and the direction of the program.

However, the Department is concerned about the area to the south where the protective clay barrier layer thins or disappears as there may be greater risk of vapours migrating into homes in this area. As such, the Department requires that Sears/Clifton prioritize this area for the prompt collection of data and risk assessment.

Other Concerns are:

- Possible preferential pathways for subsurface movement of contaminants.
- Impacted soil remains on-site in the area of the mall even after excavations; these impacted areas may need further assessment or remedial action.

There was some discussion on complex technical details for the risk assessment. The Department agreed to follow-up with Intrinsik, and these communications may be ongoing during our review of the risk assessment.

Remediation

In the meeting, there was some discussion about additional remediation that would be implemented in the community in 2016. The Remediation Plan to be submitted in the first quarter of 2016, needs to consider knowledge of the whole site (including North Hill mall and the community), and include the following: what additional remediation is being planned, where will it be located, when will it be implemented, details of how the planned remediation will be effective for site-specific conditions, and how it's effectiveness will be monitored.

The Department is not clear on the effectiveness of the dual phase extraction system being used. Provide in the annual report technical information on the operation and removal of contaminants. What upgrades to the system may be needed, and what further steps need to be taken to prevent further migration of contamination into the community?

Conclusions

We appreciate Sear's continued commitment to assess, monitor, and remediate the contaminant plume, and to ongoing communication with all stakeholders about the findings and progress being made at the site. We look forward to such future activities taking place on schedule.

You can contact me at 403-297-8270 or at kim.kirillo@gov.ab.ca with any questions or concerns regarding the above comments and requirements.

Sincerely,



Kim Kirillo
Contaminated Sites Coordinator

cc: Stephen d'Abadie, Clifton Associates
David Crowe, Alberta Health Services
Eden Pearson, Alberta Environment and Parks