

Canada – Overall Comments on Draft Guidance for Contaminated Sites

1. The draft guidance document has improved, particularly in the site identification and characterization sections. As outlined below and as highlighted within the attached guidance document, additional work is needed in a number of areas.
2. Generally, more references are needed throughout the document. Providing links to examples or case studies in various jurisdictions would be helpful for users of the guidance so they could find out more information from the source documents. References are needed in sections D and E in particular.
3. This document would benefit from a section or paragraph that discusses how to choose a project or remediation objective/indicator (i.e. what is the acceptable level of mercury remaining after remediation, when can remediation be declared successful?). These could differ by site depending on land use.
4. The section on thermal treatment (p. 64) mentions the BAT/BEP for controlling and reducing emissions of mercury and mercury compounds to the atmosphere developed under Article 8. Reference to this document needs to be carefully considered because BAT/BEP developed under Article 8 is intended to be used for incineration of waste, not contaminated soils.
5. An estimate of the financial costs for the remediation techniques would be helpful if information is available. Case studies including the project costs may be helpful.
6. For section G, the distinction between validation, verification and monitoring activities needs to be clearer. Additional guidance is needed on monitoring activities during and post remediation. The following questions could be considered:
 - What steps are needed to design a monitoring program?
 - What factors need to be considered in monitoring program design?
 - How frequently should sampling activities occur?
 - Where should sampling activities occur (e.g. at the site or beyond the site boundary)?
 - How many samples are needed or how long does monitoring need to occur before it can be concluded that remediation was successful?
7. On the figure in Appendix I, it should be clear that public engagement should occur throughout the process of contaminated site management, not just in the site investigation and appraisal steps.
8. The information in Appendix II needs to be either integrated into the document within relevant sections or removed.