

Submitting Record of Site Condition (RoSC): Intent of Submission

Intended User: Authorized representatives of AER regulated licensees and assigned delegates

Overview

This quick reference guide provides additional information on the “Intent of Submission” selection within the Record of Site Condition (RoSC) module in OneStop.

Intent of Submission

The intent of submission identifies which legislative role the submission is intended to fulfill:

- Providing details on remedial measures as required by the *Environmental Protection and Enhancement Act (EPEA)*
- Seeking regulatory acceptance for a submission (e.g., remediation certificate application)

This legislative role is identified through two questions:

- What is the intent of submission?
- What submission best fulfills that intent?

Important:

The submission type does not need to match the title of the professional report(s) attached to the RoSC.

Terms

Accepted: Status indicating the RoSC has been accepted for intake and has met administrative review. This is not the same as regulatory acceptance.

Returned: Status indicating an incomplete submission.

Where a regulatory decision has been provided, the same OneStop submission statuses will be visible. However, a letter will be attached providing regulatory acceptance or rejection. Submission types and associated regulatory decisions are summarized in Table 1.

Whether a regulatory decision is required or not, the licensee is responsible for managing the site and implementing remedial measures in accordance with the applicable legislation including, submitting remedial action plans (RAPs) in fulfillment of the *Remediation Regulation, section 2.2*.

Intent of Submission Options

The RoSC provides three intent of submission options to select from:

- Contaminant Identification and Characterization
- Remedial Measures
- Regulatory or Administrative Closure of Contamination

Each intent of submission has its own set of submission types that best fulfill it.

What is the intent of submission? *	
Is the submission associated with an Environmental Protection and Enhancement Act Approval? *	<input type="checkbox"/> Contaminant Identification and Characterization <input type="checkbox"/> Remedial Measures <input type="checkbox"/> Regulatory or Administrative Closure of Contamination

Contaminant Identification and Characterization

This intent is best suited for submissions where contamination exists, where the extent of contamination is being determined, and/or risk of the contamination is being assessed (e.g., evaluating a Tier 1 exceedance). No submission types under this intent require regulatory acceptance.

Remedial Measures

This intent is best suited for providing information on remedial measures and compliance with the *Remediation Regulation*. Generally, this intent is for RAP or risk management plan submissions where regulatory acceptance is required.

Important:

Ongoing reporting for an existing RAP and remediation reports, do not require regulatory acceptance.

Regulatory or Administrative Closure of Contamination

This intent provides options for closure submissions around contamination. Submission types under this intent require regulatory acceptance, except for the Pre-Reclamation Certificate Application Contamination Review.

Important:

Applying for closure of contamination before site closure is an option at any point in the lifecycle (e.g., applying for a Tier 2 compliance letter before reclamation).

Submission Types

Once a submission intent is selected, a drop-down menu appears listing options that best fulfil the particular intent. Table 2 summarizes the submission types and scenarios.

Contaminant Identification and Characterization

- Groundwater Monitoring Report
- Groundwater Monitoring Update
- Soil Monitoring Report
- Surveillance Monitoring Report
- Phase 2 Environmental Site Assessment Report
- Other

For this submission type, applicable scenarios and drop-down menu selections are listed below:

- Submission required by *EPEA* approval:
 - **Groundwater Monitoring Report**
 - **Groundwater Monitoring Update**
 - **Soil Monitoring Report**
 - **Surveillance Monitoring Report**
- A Phase 2 has been completed for a new release, or new information is being provided (as per the *Remediation Regulation*):
 - **Phase 2 Environmental Site Assessment Report:** Includes reports detailing any site characterization or monitoring activities that are not associated with an EPEA approval. This selection informs the AER of the current understanding of the site but is not subject to any regulatory acceptance.
- None of the above scenarios are relevant:
 - **Other:** Contact csusubmissions@aer.ca before using this submission type. In most cases, a submission would fall under one of the submission types above.

Remedial Measures

- Decommissioning Report
- Environmental Summary Report
- Soil Management Report
- Remediation Report
- Remedial Action Plan
- RoSC and Professional Report serving as a Remedial Action Plan
- Ongoing reporting of an accepted Remedial Action Plan
- Risk Management Plan
- Site-Specific Risk Assessment
- Request for Acceptance of Other Standard of Remediation
- Other

For this submission type, applicable scenarios and drop-down menu selections are listed below:

- Submission required by *EPEA* approval:
 - **Decommissioning Report**
 - **Environmental Summary Report**
 - **Soil Management Report**
 - Detailing remediation results, which may include partial remediation:
 - **Remediation Report:** No formal acceptance of guidelines is provided when submitting a remediation report. Interim reports detailing partial remediation for releases that will be fully remediated within two years of discovery, may be submitted under this option. Where contamination management is ongoing and a RAP has been accepted, see “Ongoing reporting of an accepted Remedial Action Plan.”
 - Submission of a RAP as required by section 2.2(2) of the *Remediation Regulation*, an *EPEA* approval, or at the director’s request:
 - **Remedial Action Plan:** Written acceptance will be provided for RAPs or changes/updates to existing RAPs.
 - A report and RoSC are serving the function of a RAP:
 - **RoSC and Professional Report serving as a Remedial Action Plan:** Information provided in the RoSC (specifically next steps and timelines) and the professional report provides the elements of a RAP and fulfills the requirements under section 2.2(2) of the *Remediation Regulation*. Written acceptance of timelines for remedial actions will be provided for RoSCs and professional reports serving as RAPs.
- Important:**
This option may be used when submitting a Phase 2 Environmental Site Assessment that serves the purpose of a RAP under the *Remediation Regulation*. In this case, reporting requirements for both the Phase 2 Environmental Site Assessment and RAP will be considered met.
- Details of the implementation of a Remedial Action Plan:
 - **Ongoing reporting of an accepted Remedial Action Plan:** No formal acceptance for ongoing update reports on a RAP is provided.
 - If changes to any elements of the RAP occur, select **Yes** to the question, “Does the submission contain a request to modify the previously accepted program or plan?” after indicating there is an accepted RAP associated with the site. In this case, the submission will be considered a new RAP and will be reviewed for acceptance.

- A formal risk management plan is required as per the *Risk Management Plan Guide*.
 - **Risk Management Plan:** Written acceptance will be provided for risk management plans or changes/updates to existing risk management plans.
- Site-specific risk assessment as per *Alberta Tier 2 Soil and Groundwater Remediation Guidelines* has been conducted:
 - **Site-Specific Risk Assessment:** A review and consultation of the submission will only be provided if the conditional question is answered “Yes.” See image below.

Are you requesting review and consultation of the Site-Specific Risk Assessment from the Regulator? *	<input type="button" value="Yes"/> <input type="button" value="No"/>
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- Seeking acceptance of a standard for remediation other than those listed in “Guidelines” section 2(1) of the *Remediation Regulation*:
 - **Request for Acceptance of Other Standard of Remediation:** Contact csusubmissions@aer.ca if you intend to use this submission type.

Important:

In most instances, Site-Specific Risk Assessment is likely the most appropriate submission type.

- None of the provided intents are relevant:
 - **Other:** Contact csusubmissions@aer.ca before using this submission type. A regulatory decision may not be provided with this selection.

Regulatory or Administrative Closure of Contamination

- Application for Tier 2 Compliance Letter
- Remediation Certificate Application
- Pre-Reclamation Certificate Application Contamination Review
- Reclamation Certificate Application

For this submission type, applicable scenarios and drop-down menu selections are listed below:

- When seeking formal acceptance for a site that meets Tier 2 remediation guidelines and remediation is not required:
 - **Application for Tier 2 Compliance Letter:** As per section 2.5(1) of the *Remediation Regulation*, written acceptance will be provided for Tier 2 compliance letter applications.
- Application for a remediation certificate under section 3(1) of the *Remediation Regulation*:
 - **Remediation Certificate Application:** Written acceptance will be provided for remediation certificate applications.
- All contamination information that supports a reclamation certificate application on sites which apply Tier 2 approaches, including justification for minor exceedances that do not require remediation, submitted in advance of reclamation activities:
 - **Pre-Reclamation Certificate Application Contamination Review.**
- Application for a reclamation certificate:
 - **Reclamation Certificate Application:** Professional report(s) and RoSC are being submitted as part of a reclamation certificate application in OneStop. Do not select this submission if reclamation has not been completed.

Table 1. Summary of RoSC Submission Types and Submission Status Based on Requirement for Regulatory Decision

Regulatory Decision Involved	Submission Status		Submission Types
	Accepted	Returned	
No	<ul style="list-style-type: none"> Submission received in OneStop. Additional requirements for the site, if any, will be attached to the decision. 	<ul style="list-style-type: none"> RoSC administratively incomplete and requires resubmission. Identified deficiencies attached with decision. 	<ul style="list-style-type: none"> Groundwater Monitoring Report Groundwater Monitoring Update Soil Monitoring Report Surveillance Monitoring Report Phase 2 Environmental Site Assessment Report Decommissioning Report Environmental Summary Report Soil Management Report Remediation Report Ongoing reporting of an accepted Remedial Action Plan* Pre-Reclamation Certificate Application Contamination Review
Yes	<ul style="list-style-type: none"> Submission accepted in OneStop and review for regulatory acceptance provided. Written acceptance attached with decision (except for reclamation certificate application submissions). Decision may be accompanied by additional requirements for the site. 	<ul style="list-style-type: none"> RoSC administratively incomplete and requires resubmission. Identified deficiencies attached with decision. <p>or</p> <ul style="list-style-type: none"> Regulatory acceptance cannot be provided and revisions to the professional report(s) are required before resubmission. Identified deficiencies attached with decision. Decision may be accompanied by additional requirements for the site. 	<ul style="list-style-type: none"> Remedial Action Plan RoSC and Professional Report serving as a Remedial Action Plan Risk Management Plan Site-Specific Risk Assessment (Consultation Requested) Request for Acceptance of Other Standard of Remediation Application for Tier 2 Compliance Letter Remediation Certificate Application Reclamation Certificate Application**

*Regulatory acceptance will be required if **Yes** is selected for the question, "Does the submission contain a request to modify the previously accepted program or plan?"

**Regulatory review of a reclamation certificate application is provided through the Reclamation Certificate Application in OneStop, not through RoSC.

Table 2 Summary of Record of Site Condition Submission Types and Examples of Applicable Scenarios

Intent of Submission	Submission Type	Routine Monitoring	Incident response	Facility monitoring	EPEA Approval compliance	Proposing remediation and/or remedial measures	Proposing risk management	May contain risk management elements	Reporting on contamination management	Detailing remediation results (S. 2.2(1)(b) Remediation Regulation	Seeking regulatory acceptance of contamination end-points	Infrastructure removal	Contamination closure	Regulatory decision
Contamination Identification and Characterization	Groundwater Monitoring Report	Yes		Yes	Yes									
	Groundwater Monitoring Update	Yes		Yes	Yes									
	Soil Monitoring Report	Yes		Yes	Yes									
	Surveillance Monitoring Report	Yes		Yes	Yes									
	Phase 2 Environmental Site Assessment Report	Yes	Yes	Yes										
Remedial Measures	Decommissioning Report	Yes		Yes	Yes							Yes		
	Environmental Summary Report			Yes	Yes				Yes					
	Soil Management Report			Yes	Yes				Yes					
	Remediation Report		Yes					Yes	Yes	Yes				
	Remedial Action Plan				Yes	Yes								Yes
	RoSC and Professional Report serving as a Remedial Action Plan					Yes	Yes							Yes
	Ongoing reporting of an accepted Remedial Action Plan*				Yes			Yes	Yes					
	Risk Management Plan	Yes						Yes	Yes					Yes
	Site-Specific Risk Assessment (Consultation Requested)							Yes		Yes	Yes			Yes
	Request for Acceptance of Other Standard of Remediation										Yes			Yes
Regulatory or Administrative Closure of Contamination	Application for Tier 2 Compliance Letter									Yes	Yes		Yes	Yes
	Remediation Certificate Application									Yes	Yes	Yes	Yes	Yes
	Pre-Reclamation Certificate Application Contamination Review									Yes	Yes			
	Reclamation Certificate Application**									Yes	Yes	Yes	Yes	Yes

*Regulatory acceptance will be required if **Yes** is selected for the question, "Does the submission contain a request to modify the previously accepted program or plan?"

**Regulatory review of a reclamation certificate application is provided through the Reclamation Certificate Application in OneStop, not through RoSC.

Note: The scenarios shown above are not exhaustive. This table is intended to be used as a general reference to aid in selection of the intent of submission.