

April 8, 2011

Mr. Atif Durrani  
Senior Policy Advisor  
Ministry of the Environment  
Integrated Environmental Planning Division  
Land and Water Policy Branch  
135 St Clair Ave W., Floor 6  
Toronto, ON M4V 1P5

Re: **CPPI Submission in respect to Proposal for Amending Ontario Regulation 153/04, Brownfields Records of Site Condition (EBR Registry No 010-2347)**

Dear Mr. Durrani:

The Canadian Petroleum Products Institute [CPPI] welcomes the opportunity to respond to the MOE EBR posting # 011-2347, entitled "Proposal for Amending Ontario Regulation 153/04, Brownfields Records of Site Condition".

CPPI continues to be a major stakeholder in the remediation of Brownfields in Ontario and we support Ontario's objective to continuously improve the protection of human health and the environment while at the same time removing barriers to the redevelopment of Brownfields. We value the collaborative dialogue that continues on the Brownfield reforms and it is in this spirit of cooperation that we present our comments.

CPPI supports the addition of new Petroleum Hydrocarbons (PHC) background numbers. CPPI was pleased to have worked with the Ministry of Environment on this project study, that was executed by the Ontario Centres of Excellence, in order to have an upgrade of the background values.

CPPI supports making the proposed improvements to address aquatic protection for sodium.

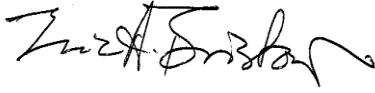
CPPI supports correcting the outlined errors in the approved model, which impact standards.

CPPI supports making the proposed improvements to the Modified Generic Risk Assessment (MGRA) model. We are pleased that the MOE will remain open to making other changes and improvements to MGRA model as they are identified, under rolling incorporation.

CPPI supports making the proposed corrections for consistency between the MGRA and O. Reg. 153/04.

CPPI supports making the proposed changes to the Potentially Contaminating Activities list.

We thank you again for the opportunity to provide input from CPPI.



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George Vincent  
Chair, National Brownfields Committee  
Canadian Petroleum Products Institute

cc Mr. Dale Henry, Director, Standards Development Branch, MOE  
Mr. Craig Kinch, Manager, Ministry of the Environment  
Mr. Chris Thompson, Provincial Brownfields Coordinator, Ministry of Municipal Affairs and Housing.  
Ms. Faith Goodman, Vice President, Canadian Petroleum Products Institute – Ontario Division.