



MEMORANDUM

To: Zelinka Priamo Ltd. – Land Use Planners
318 Wellington Road, London, ON N6C 4P4

Attention: Dave Hannam and Taylor Whitney.

From: Jose La O, MSc., Riyaz Punjani, P. Eng., QPESA

Date: July 9, 2024

Subject: Summary of the Findings and Current Status of Phase Two ESA and Risk Assessment for the Property at 200 Exmouth Street, Point Edward, Ontario.

INTRODUCTION

S2S Environmental Inc. (S2S) was retained by The Village of Point Edward and MALLEUM Partners (the Client) to conduct Phase One and Phase Two Environmental Site Assessments (ESAs) of the vacant (formerly industrial) property located at 200 Exmouth Street in Point Edward, Ontario (Subject Lands).

It is understood that these assessments are being completed in support of the property redevelopment/sale purposes and are being completed in accordance with Ontario Regulation 153/04 – Records of Site Condition – Part XV.1 of The Environmental Protection Act (O. Reg. 153/04, as amended) to be filed with the Ontario Ministry of the Environment, Conservation and Parks (MECP).

Furthermore, in addition to the above, S2S was also retained to complete the delineation and remediation of the previously identified contaminant-impacted areas based on the requirements of RSC Risk Assessment (RA) data input and modelling at the Subject Lands.

SUMMARY OF FINDINGS

Based on information gathered and observations made, the Phase One ESA has identified 28 Potentially Contaminating Activities (PCAs) resulting in 28 Areas of Potential Environmental Concern (APECs) within Subject Lands. Each of these APECs are required to be investigated as part of the Phase Two ESA process; therefore, based on the identified APECs from the Phase One ESA, a Phase Two ESA was recommended and completed at the Subject Lands to assess the quality of the soils and groundwater in accordance with the current applicable O. Reg. 153/04, as amended Standards.

Primary areas of concern requiring investigations included on-site historical activities i.e., bulk chemical/fuel storage, waste dump and foundry activities, including metal fabrication and asbestos insulation manufacturing. Contaminants of concern were identified as volatile organic compounds (VOC), petroleum hydrocarbons fractions F1-F4 (PHC) and polycyclic aromatic hydrocarbons (PAH).



Subsurface drilling and excavation activities at Subject Lands have been completed in four stages from February 2022 to March 2023 based on the logistics of Subject Lands and access limitations. These have resulted in a total of approximately 70 drilling locations, including five exploratory excavations of mass concentrations (hot spots) of contaminants with respective lateral and vertical delineation boreholes and groundwater monitoring wells. The analytical soil and groundwater results to-date indicate remaining soil and groundwater contaminant concentrations can be appropriately managed via a Risk Assessment remediation approach to satisfy the MECP RSC requirements.

Based on analytical results from the Phase Two ESAs, all concentrations of contaminants of concern analyzed in soil and groundwater were below the applicable MECP Table 3 Standards with some exceptions on the west, south-central, and southeast portions of the Subject Lands, including the former Foundry Building, Insulation Building, and Insulation Storage Building footprint in central, east central, and north portions of the Subject Lands, respectively.

On December 2023, the process for the pre-submission form (PSF2196-23, IDS Ref No. 3717-CYHPYA) for the risk assessment (PSF/RA) under O. Reg 153/04 for the Subject Lands on behalf of MALLEUM Partners was initiated. On March 2024, MECP provided comments and questions on the PSF. Although the baseline data collected is agreed to be representative, the MECP requires further delineation to satisfy the regulation requirements to obtain an RSC. All these concerns are addressable by acquiring more field data, which will represent additional fieldwork for drilling and sampling soil and groundwater and re-submitting the RA.

NEXT STEPS

The above provided information indicates that further efforts are necessary to thoroughly assess, delineate, and quantify the environmental conditions of the Subject Lands. This includes acquiring additional soil and groundwater data to address the APEC data deficiencies to the MECP's satisfaction; and conducting the required environmental investigations to incorporate the neighbouring parcel (206 Exmouth Street – IOL Lands) into the PSF/RA process of the Subject Lands.

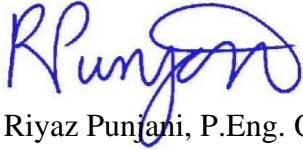
Based on the collected data and MECP comments, the Subject Lands is expected to be eligible to follow a “Tier 3” RA under O. Reg. 153/04, which requires the recommended documentation and reporting which is currently underway. After obtaining the additional results, the Phase Two ESA CSM will be updated by S2S and PSF will be revised and resubmitted to the MECP by our RA-qualified assessors. It is expected that the additional field work and data analyses will be completed in 3 to 4 months and the PSF will then be resubmitted (anticipating late October/early November).

Following up on that, the RA Tier 3 will be submitted, including another round of resubmission to address ongoing MECP regulatory minor review comments. It can be anticipated that the RA will likely be acknowledged by mid-2025 and the RSC Filing will be completed by the end of 2025.



If you have any further questions, do not hesitate to contact our office.

S2S ENVIRONMENTAL INC.



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