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PROJECT NO.: SM 200098-E April 8, 2022

COLETARA DEVELOPMENT
966 Pantera Drive, Suite 22
Mississauga, Ontario
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Attention: Mr. Michael Krasic, MREI, BBA
Senior Director of Development

ENVIRONMENTAL CONSIDERATIONS
PROPOSED MID-RISE RESIDENTIAL BUILDINGS
1010 DOWNSVIEW DRIVE AND 355 PLAINS ROAD EAST
BURLINGTON, ONTARIO

Dear Mr. Krasic,

Further to our recent discussions and email correspondence, Soil-Mat Engineers & Consultants Ltd. is pleased to provide the following environmental considerations with respect to the above noted properties.

It is understood that it is intended to undertake construction of a residential redevelopment on the subject sites, consisting of mid-rise buildings. As the sites are presently occupied by commercial plazas the proposed residential redevelopment would represent a change in land use to a more sensitive case. As such, a mandatory Record of Site Condition [RSC] would be warranted in this scenario under Ontario Regulation 153/04 [as amended].

Our office previously prepared the following Environmental Reports for the properties:

- Phase One Environmental Site Assessment, 1010 Downsview Drive, Burlington, Ontario, Project No. SM 156176-E, dated July 24, 2015.
- Environmental Soil Sampling, 1010 Downsview Drive, Burlington, Ontario, Project No. SM 156176-E, dated March 29, 2016.
- Phase One Environmental Site Assessment, 355 Plains Road East, Burlington, Ontario, Project No. SM 156176-E, dated July 24, 2015.
- Phase Two Environmental Site Assessment, 355 Plains Road East, Burlington, Ontario, Project No. SM 156176-E, dated March 29, 2016.

It is understood that ownership and use of these reports transferred to Coletara Development as part of the purchase of the properties.

The purpose of these environmental considerations is to summarise the findings of our prior reports, and outline the appropriate next steps to achieve the required RSC filings for the two properties to support the proposed residential redevelopment.

1010 DOWNSVIEW DRIVE

Our 2015 Phase One ESA report noted the following:

> *At the time of this Report the Site was comprised of an irregular shaped parcel of land consisting of a single storey, multi-unit commercial building with no basement. The remainder of the Site was comprised of an asphalt parking lot with minor landscaping around the perimeter of the Site.*
>
> *The research undertaken during this Phase One ESA did not reveal any readily available records that indicate any past industrial operations having occurred on the Site. The lands in the general vicinity of the Site are comprised of residential, commercial, institutional, and vacant lands that based on the information currently available to SOIL-MAT ENGINEERS are not anticipated to have an adverse environmental impact on the Site.*
>
> *Based on the findings of the Phase One Environmental Site Assessment, SOIL-MAT ENGINEERS & CONSULTANTS LTD. find the potential of Site contamination to be considered LOW and therefore recommend that additional investigations ARE NOT required at this time, pending the results of the Ministry of the Environment database search which will be forwarded to MY WAY INVESTMENTS under a separate cover once they are received in our Office.*

In addition, as part of geotechnical investigation work at the time, our office conducted background environmental testing on three [3] selected representative samples. The purpose of this testing was to assess the background environmental characteristics of the on-site soils and provide preliminary comments with respect to handling and off-site disposal of surplus soil during future construction. The results of this testing noted the following:

> *Based on Soil-Mat Engineers & Consultants Ltd.'s field observations and the analytical test results from AGAT, Soil-Mat Engineers & Consultants Ltd. have the following comments to offer:*
>
> *1. All tested samples were found to exceed the Table 1 [All] Standards for Sodium Adsorption Ratio [SAR]. Sample 'BH4 SS1' was found to exceed the Table 1 [All] Standards for Electrical Conductivity [EC].*
> *2. Samples 'BH1 SS1' and 'BH4 SS1' were found to exceed the Table 2 and Table 3 [RPI] Standards for SAR. Sample 'BH4 SS1' was found to exceed the Table 2 and Table 3 [RPI] Standards for Electrical Conductivity [EC]. Sample*

'BH2 SS1' was found to be within the Table 2 and 3 [RPI] Standards for the tested parameters.

3. *Sample 'BH4 SS1' was found to exceed the Table 2 and Table 3 [ICC] Standards for SAR. Samples 'BH1 SS1' and 'BH2 SS1' was found to be within the Table 2 and 3 [RPI] Standards for the tested parameters.*
4. *It is noted that the presence of elevated levels of EC and/or SAR are typically the result of the use of salt for winter de-icing operations in areas of roadways, parking lots, etc. It is essentially an aesthetic parameter that does not present a hazard to human or animal life. Rather it tends to render the soil environment un-supportive of plant growth and corrosive to buried grey or cast iron pipe.*
5. *The samples secured for analytical testing are believed to be representative of the soil conditions. No evidence of potential impact, i.e. staining or odours, were observed during the fieldwork. If any significant changes are noted, i.e., odours, staining etc., SOIL-MAT should be contacted to reassess the environmental characteristics of the soil.*

Given the above test results the following disposal options are applicable under Regulation 153/04 [amended by Regulation 511/09 effective July 1, 2011].

- *As the test results for the submitted samples exceed the Table 1 Standards for EC and SAR, the material should not be accepted at an off-site property subject to Table 1 requirements [i.e. lands subject to a Record of Site Condition of MOE Certificate of Authorisation];*
- *As the tested material was found to exceed the Table 2 and 3 [RPI & ICC] Standards for EC and SAR, strictly speaking, surplus material may not be disposed of at an off-site RPI or ICC property in a potable or non-potable groundwater condition;*
- *Given the aesthetic nature of the elevated SAR and EC parameters it may be possible to accept this material at a Table 2 or 3 [RPI or ICC] property considering the 'beneficial use' concept, however this may require additional testing, assessment of the receiving property, approval of the receiving property owner, and depending on the location and nature of the property, consultation with the local MOE District Engineer.*

Based on the prior reports, there was no evidence of any significant potential environmental liabilities to the Site that would warrant further intrusive sampling. With respect to the noted elevated levels of EC and/or SAR, Regulation 153/04 as since been amended to provide an exemption for these parameters associated with the application of de-icing salt for vehicle and pedestrian safety. As such, further assessment of these parameters is not warranted.

In order to support the submission of a Record of Site Condition for the property, it would be necessary for the Phase One ESA report to be updated to be current, within 18 months of the date of RSC filing, and in accordance with the current requirements of Regulation 153/04.

Should the updated Phase One ESA identify any activities of potential environmental concern on or adjacent to the site since the time of the 2015 Phase One, there may be a need for further intrusive sampling. In this regard, it is noted that there is a pad mounted hydro transformer located at the south limit of the property. While this would not be considered a significant concern from a due diligence perspective, experience in recent years has found that the Ministry will require analytical soil data adjacent to the transformer as part of an RSC submission.

355 PLAINS ROAD EAST

Our 2015 Phase One ESA report noted the following:

> *At the time of this Report the Site was comprised of a roughly rectangular shaped parcel of land occupied by a single storey, multi-unit commercial building with no basement. The remainder of the Site was comprised of an asphalt parking lot with minor landscaping around the perimeter of the Site.*
>
> *The research undertaken during this Phase One ESA did not reveal any readily available records that indicate any past industrial operations having occurred on the Site. The lands in the general vicinity of the Site are comprised of residential, commercial, institutional, and vacant lands that based on the information currently available to SOIL-MAT ENGINEERS are not anticipated to have an adverse environmental impact on the Site.*
>
> *Based on the findings of the Phase One Environmental Site Assessment, SOIL-MAT ENGINEERS & CONSULTANTS LTD. find the potential of Site contamination to be considered **MEDIUM** and therefore recommend that additional investigations **ARE** required at this time, pending the results of the Ministry of the Environment database search which will be forwarded to MY WAY INVESTMENTS under a separate cover once they are received in our Office.*
>
> *The areas of concern identified during this Phase One ESA are listed below:*
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> - *The Phase One ESA revealed an existing dry cleaning operation on site for 9 years [2006 to present] that uses Perchloroethylene [PERC] as a cleaning solvent;*
>
> *To reduce SOIL-MAT ENGINEERS' degree of uncertainty associated with each PCA further assessment activities are recommended, as outlined below:*

Environmental Liability	Recommendation	Rationale
Dry Cleaning Operations	Advance three or four boreholes and install ground water monitoring wells around the dry cleaning operations.	Confirm or refute the presence of soil and ground water impact from the on-site dry cleaning facility.

Based on the findings of the Phase One ESA, a scope of Phase Two ESA sampling and testing of soil and groundwater was undertaken. The results of this sampling and testing were presented in our referenced Phase Two ESA report, which provided the following conclusions:

> *Based on the information collected as part of our previous Phase One ESA, two [2] areas of potential environmental concern were identified in the soil medium, including the following:*
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> ***VOC SOIL IMPACT***
>
> *The Phase Two ESA activities carried out by SOIL-MAT ENGINEERS did not reveal any VOC impact within the soil medium on the subject property at the sampling locations.*
>
> ***METALS AND INORGANICS SOIL IMPACT***
>
> *The Phase Two ESA activities carried out by SOIL-MAT ENGINEERS revealed metals and inorganics impact within the on-site fill soils in the form of exceedances for Sodium Adsorption Ratio [SAR]. Elevated levels of SAR are typically associated with the application of salt from de-icing operations within parking lots and along municipal roadways. The exceedances indicated in the analytical test results are generally contained within the upper 1.4 metres of the sand fill material; however the total vertical extent of this impact is as of yet unknown. Furthermore, the total lateral extent of this impact is yet to be determined.*
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> ***GROUNDWATER ANALYTICAL DATA***
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> *The Phase Two ESA activities undertaken on the Site by Soil-Mat Engineers did not reveal any VOC groundwater exceedances on the subject property at the sample locations.*
>
> ***PROPOSED FUTURE RESIDENTIAL REDEVELOPMENT***
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> *Given the proposed future use of the Site which includes residential applications, the property would be subject to a mandatory Record of Site Condition [RSC] filing. In order to complete and file an RSC the properties will either need to meet the applicable Ontario Regulation 153/04 [as amended] soil and groundwater standards or be subjected to a Risk Assessment.*

Presently, there is insufficient data to adequately characterize the extent of the SAR impact encountered on Site and to provide comments with regards to the necessity for remedial works and the potential costs associated with such works. It is recommended that further investigation is conducted on site to delineate the extent of the SAR impact on the subject property.

The Phase Two work demonstrated no impacts to soil or groundwater associated with the dry-cleaning operation, at the time of the sampling in 2015. Of note, the analytical results were generally below the laboratory detection limits in most cases for VOCs [contaminants of concern for dry-cleaning]. This provides a reasonable basis, from a due diligence standpoint, that the operation has not resulted in an adverse impact to the site. However, if the dry-cleaning operation continued for any length of time after the 2015 Phase Two work, in order to support an eventual RSC filing, it would be warranted to undertake current sampling and testing to confirm that there has not been any adverse impact to the site in the intervening time period.

With respect to the noted elevated levels of EC and/or SAR, Regulation 153/04 as since been amended to provide an exemption for these parameters associated with the application of de-icing salt for vehicle and pedestrian safety. As such, further assessment of these parameters is not warranted.

In order to support the submission of a Record of Site Condition for the property, it would be necessary for the Phase One ESA report to be updated to be current, within 18 months of the date of RSC filing, and in accordance with the current requirements of Regulation 153/04.

Should the updated Phase One ESA identify any activities of potential environmental concern on or adjacent to the site since the time of the 2015 Phase One, there may be a need for further intrusive sampling. In this regard, it is noted that there is a pad mounted hydro transformer located at the south limit of the property. While this would not be considered a significant concern from a due diligence perspective, experience in recent years has found that the Ministry will require analytical soil data adjacent to the transformer as part of an RSC submission. In addition, as noted, it would be warranted to conducted resampling to confirm there has been no adverse impact associated with the dry-cleaning operation.

SUMMARY AND NEXT STEPS

For the 1010 Downsview Drive property, the available information suggests there is limited environmental concern for the site. As part of the process to support an RSC filing, to satisfy the requirements of the Regulation, the following steps are recommended:

1. Conduct a current Phase One ESA, to be within 18 months of the date of RSC filing.

2. Conduct any necessary Phase Two ESA sampling and testing identified in the Phase One ESA. In this regard, as noted, this would include the following:
   - Minor sampling adjacent to the ground mounted hydro transformer would be warranted. This is considered to have a relatively low risk of environmental concern, however is required in order to support the RSC filing.

For the 355 Plain Road East property, the available information suggests there is limited environmental concern for the site. As part of the process to support an RSC filing, to satisfy the requirements of the Regulation, the following steps are recommended:

1. Conduct a current Phase One ESA, to be within 18 months of the date of RSC filing.
2. Conduct any necessary Phase Two ESA sampling and testing identified in the Phase One ESA. In this regard, as noted, this would include the following:
   - Minor sampling adjacent to the ground mounted hydro transformer would be warranted. This is considered to have a relatively low risk of environmental concern, however is required in order to support the RSC filing.
   - Conduct current sampling of soil and groundwater to verify there has been no adverse impact as a result of the dry-cleaning operation since the time of the 2015 sampling. Based on the prior results, there is considered to be a relatively low potential for adverse impact, however current testing is required under the Regulation to support the RSC filing.

It is noted that any required Phase Two ESA sampling could be readily incorporated into the scope of further geotechnical investigations on the site to support the design of the proposed mid-rise buildings.

Pending the results of the current Phase One and Two ESA work, RSCs for the subject sites would be filed. It is noted that separate RSC filings would be required for each parcel.

We trust that these brief comments are helpful at this time. Of course, do not hesitate to contact the undersigned should there be any questions.

Yours very truly,
SOIL-MAT ENGINEERS & CONSULTANTS LTD.



Ian Shaw, P.Eng., QP_{ESA}
Senior Engineer



Distribution: Coletara Development [1, by email]

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