

**Information received by the Township regarding the reasoning, delivery, and potential costing for an Environmental Site Assessment.**

**Received December 2020**

## **Environmental Site Assessment Process – Raisin River Heritage Centre**

Further to our discussion we are writing to provide a brief overview of a due diligence approach to environmental site assessment, and how it relates to subsequent steps such as remediation or risk assessment. Note that this approach assumes that you will not be filing a record of site condition (for changes in landuse e.g. commercial to residential) under O. Reg. 153/04. Should you wish to file a record of site condition, the timelines and costs would need to be revisited. For convenience we have also appended a flow chart which summarizes key steps in the process.

### **1. Phase 1 Environmental Site Assessment (ESA)**

- Largely a desktop exercise to review available documents summarizing site history. Some of these records are obtained through public databases and correspondence with relevant regulators (e.g. Ministry of the Environment and TSSA).
- Site reconnaissance visit, a non-intrusive (no soil or groundwater sampling) observation of the site and surroundings.
- Objective of this work is to determine if there are potentially contaminating activities (PCAs) on site or within vicinity of site, that would contribute to an area of potential environmental concern (APEC) at the site. A PCA is something that could result in contamination (e.g. a furnace oil tank).
- Timeline 6-8 weeks, but freedom of information requests that we file to support this work are taking much longer than this due to COVID. We can issue the report in draft and provide update when we receive a response, or withhold the report pending receipt of the FOI request response. Timeline can be reduced by two weeks if work is initiated in 2021.
- Budget approximately \$3,500

If the Phase 1 ESA identifies one or more APEC(s) at the site, we would recommend a Phase 2 ESA to investigate further.

### **2. Phase 2 ESA**

- Intrusive investigation of the site to evaluate APECs.
- Includes soil sampling, installation of monitoring wells and groundwater sampling.
- The investigation is guided by the Phase 1 ESA (i.e. it informs where we sample, what we sample and what contaminants we evaluate the samples for during the intrusive investigation).
- Evaluate results and determine if soil and groundwater meet applicable site condition standards.
- Objective of the work is to determine if soil or groundwater environmental quality at the subject site is acceptable for the intended use.
- Timeline 8-10 weeks. Generally we recommend this work be completed when there is no snow cover.
- Budget approximately \$25,000 to \$40,000+. These costs may increase if further delineation is required and assumes installation of three monitoring wells. We have also assumed work will need to be completed with limited overhead clearance (i.e. indoors).

If contamination is identified as a result of the Phase 2 ESA we would work with you to evaluate the cost benefit of remedial options, undertake further delineation as required, and/or coordinate the completion of remedial work and/or a risk assessment.

Generally speaking:

- Remediation removes contamination,
- Risk assessment identifies site specific standards that are often accompanied by risk management measures that limit the transfer of contamination to potential receptors.
- Risk management measures may include limitations on how the property can be used in the future and/or require ongoing maintenance and monitoring of engineered controls to limit risk of exposure to unacceptable concentrations of a contaminant.

In addition to the Phase 1 and 2 process we spoke about an RSC and the protections it may provide you. An RSC does provide certain protections against MECP orders and is specific to a property description. As such an RSC does not address contamination that extends or exists outside of a property description (e.g. offsite) and as a result, does not eliminate risk in our opinion. A Phase 1 and if needed a Phase 2 can help manage your risk by identifying potential contamination at your site, so that you better understand what you may be transferring to another party and if that risk is reasonable to you. We would be happy to discuss this with you or your legal advisors to further elaborate.

Please do not hesitate to contact us with any questions or concerns, or if you would like to discuss further.

Best Regards,

