

October 29, 2021

Premier Project Number: 616116.CE

City of Guelph
1 Carden Street
Guelph, ON
N1H 3A1**RE: CITY OF GUELPH COMMENTS ON ENVIRONMENTAL SITE ASSESSMENTS
78 & 82 EASTVIEW ROAD, GUELPH, ON**

Premier Environmental Services Inc. ("Premier") is pleased to provide the City of Guelph ("the City") with the following response to comments provided by the City as part of re-development approvals for in relation to 78 & 82 Eastview Road, Guelph, ON (the "Site"). Premier has been requested to provide a reply to the following comments. The original comment is followed by a response in italics.

1. A Record of Site Condition (RSC) is not a mandatory requirement for the Site development as the use remains the same (i.e., residential).
Noted, this is in accordance with O. Reg. 153/04 as amended.
2. Both Phase I ESA reports are dated 2017, which is older than the 18 months requirement as per the City's Guideline for Development of Contaminated or Potentially Contaminated Sites (2016).
A Phase I ESA Update has been prepared and is forwarded under separate cover.
3. Groundwater and Soil Sampling and Analysis: The report is dated August 29, 2017. Both the MWs were assumed to be installed as part of a closed landfill monitoring network but not confirmed; so, the City's assumption is that the Owner and/or the Consultant verified the assumption with the City's Solid Waste Services before cutting the pad locks and have provided the keys to the new pad locks to the aforementioned City department.
Premier has confirmed with Scott Cousins, Hydrogeologist with the City of Guelph, that the monitoring wells are not a part of the closed landfill monitoring network. These wells will require decommissioning prior to site re-development.

4. The report states that “historic imported fill spread across the south half of 82 East View Road”; however, only two (2) soil samples were collected and analyzed for PHCs and metals. The rationales for the number of samples and parameters analyzed were not mentioned.

The two (2) samples are considered sufficient to screen soils given that it appears that the thickness of soil imported does not exceed 0.3 m, and given the likelihood that these soils originated from nearby residential re-development projects which were occurring on adjacent properties when the material was imported in 2006. Additional soil testing as part of O. Reg. 406/19 excess soil characterization requirements will be needed at the time of re-development, and further soil sampling is not warranted at this time.

5. Submit an updated Phase I ESA report for both the properties completed by a QP, either in the form of a letter report or a new Phase I ESA report, for City’s review.

A Phase I ESA Update has been prepared and is forwarded under separate cover.

6. Groundwater and Soil Sampling and Analysis report is over 3 years old (August 20, 2017), which means sampling results and the report exceed stale date requirements (e.g., 18 months); as such, the QP must provide a statement to the City that the sampling results remain current and accurate.

Given that no changes have occurred on the Site or on the neighbouring properties since 2017, it is our opinion that these sampling results remain current and accurate.

7. Submit a “Reliance Letter” from a QP to indicate that despite any limitations or qualifications included in the reports, the City is authorized to rely on all information and opinion provided in the reports (both existing and future reports).

A Reliance Letter has been prepared and is forwarded under separate cover.

We trust that this letter is satisfactory for your present needs. If you have any questions, please contact the undersigned at (519) 653-7140.

Sincerely,

Premier Environmental Services Inc.



Kyla Hoyles, P. Geo., QP_{ESA, RA}
Senior Project Manager



Troy Jones, CRSP
Manager, Canadian Operations

