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Project No 20-2-1796-34

2657977 Ontario Limited  
1101 Prince of Wales Drive, Suite 115  
Ottawa, ON K2C 3W7

Attention: Mr. Darren Kettlewell,  
Development Manager  
[dkettlewell@sussexrl.com](mailto:dkettlewell@sussexrl.com)

Dear Mr. Kettlewell,

**RE:** Review of Phase I Environmental Site Assessment “Update” Report  
Devine Street Public School, 321 Devine Street  
Sarnia, Ontario

2657977 Ontario Limited (Client) retained JFM Environmental Limited (JFMEL) to review a Phase I Environmental Site Assessment (ESA) “update” report for the property located at 321 Devine Street (the Site), in Sarnia, Ontario. The report provided to JFMEL for review by the Client was entitled:

- Phase I Environmental Site Assessment “Update”  
Devine Street Public School, 321 Devine Street,  
Sarnia, Ontario  
(Dated October 9, 2019)  
(Update Report)

The Update Report was issued by Bluewater Environmental Petroleum Inc. (BEPI), dated October 9, 2019. A copy of the Update Report provided to us for review. The Client retained JFMEL to provide an opinion supporting the findings and recommendations of the Update Report.

## The Site

321 Devine Street consists of the former Devine Street Public School property located on the southeast corner of Devine street and Brock Street South. A two storey brick building originally constructed in 1891 and subsequently renovated and enlarged over the decades occupies the Site. The former school building still occupies the Site, but it is our understanding it is slated for demolition to make way for a new residential development. Since its closing, asbestos abatement work in the Site building has been conducted.

## Phase I ESA Update Report

BEPI was retained by the Client to update a Phase I ESA of the Site commissioned by Overture Devine Holdings Inc. (Overture) which was issued in April 2016. It is our understanding that Overture is the owner of the Site.

Our review of the Update Report is also to assess if it meets the *Phase I Environmental Site Assessment*, Canadian Standards Association (CSA) standard CSA Z768-01 (November 2001, Reaffirmed 2016).

BEPI stated in the Update Report that it was completed in accordance to the previously CSA standard. Based on the structure and contents of the report, we concur with that statement. Furthermore, based on the table of contents of the Update Report, it is structured to meet the requirements of O. Reg. 153/04 (Regulation) as a “compliant” document for purpose of obtaining a Record of Site Condition.

Since the purpose of this correspondence is not to re-iterate the details findings of the BEPI’s Update Report, we suggest that if detailed information associated with their work is required, that information should be referenced in the actual Update Report.

Significant findings presented in the Update Report were identified as follows:

- “Asbestos Abatement was completed by the owner relying on the findings of the ACM survey performed by Eric Ruggles of Enspect who confirmed that all visible and accessible asbestos-containing material has been removed from the Site.” A “Letter of Confirmation” from Enspect provided to BEPI from the owner was appended to the Update Report.
- Based on the results of the Update Report completed by BEPI, they stated that areas of potential environmental concern (APECs) were present on Site. The APECs were identified as the presence of certain designated substances: lead based paints (LBPs) and polychlorinated biphenyls (PCBs) in a transformer located outdoors on the west side of the Site.
- Designated Substance Survey (DSS) was rightfully recommended, which is an OHSA regulatory requisite, prior to the proposed demolition.
- An area of “Potentially Contaminating Activities” (PCAs) was identified within 250 metres of the Site boundaries (also referred to as the Study Area). The PCA within the Study Area was identified as a “spill site” located at 134 Margaret Street, located approximately 0.25 kilometres from the Site. Sarnia Hydro was the responsible party. The spill consisted of a cooling system leak associated with inclement weather. The spill was reported to have been “cleaned”.
- The Update Report concluded that “...there are no Potential Contaminating Activity (PAC) and no Areas of Potential Environmental Concern (PEC) were identified within the Phase I-ESA study area.”

Recommendations presented in the Update Report were as follows:

- BEPI recommended a designated substance survey (DSS) given the possible presence of LBPs and the ACM abatement that was carried out.
- BEPI also recommended that the demolition waste materials be removed from the Site once the Site building is demolished.

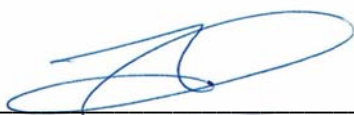
### **Conclusions of our Review of the Update Report**

The Update Report conforms to the stated CSA standard and based on its Table of Contents also conforms to the prescribed format of the Regulation. We concur with the Update Report's findings, conclusions and recommendations presented.

If you have any questions pertaining to the information presented herein, please contact the undersigned.

Yours very truly,

**JFM ENVIRONMENTAL LIMITED**

A handwritten signature in blue ink, appearing to read "Frank C. Colozza", written over a horizontal line.

Frank C. Colozza, M.Sc., P.Geo., Q.P.-(ESA) \*  
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