CONFIDENTIAL

PHASE I ENVIRONMENTAL SITE ASSESSMENT "UPDATE"

Devine Street Public School, 321 Devine Street, Sarnia, Ontario

Submitted to:

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Submitted by:

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October 09, 2019

1.0 EXECUTIVE SUMMARY

Sussex Retirement Living retained B.E.P.I Environmental Consultants on the 26th September 2019 to conduct an Updated Phase I Environmental Site Assessment (ESA) of an unoccupied/vacant property located at 321 Devine Street, Sarnia, Ontario, namely the former Devine Street Public School, hereinafter called the Site. The previous ESA Phase I Environmental Site Assessment was issued in April 2016, and thus has expired, and an update is required.

The Site is a regularly shaped property located on the east side of Brock Street Sarnia, in the proximity of the intersection of Brock and Devine Street. The Site is currently described as containing a two-storey brick School building, with an adjacent asphalted parking lot to the west, and a grassed rectangular area to the south of the school building extending to the southern property limit.

The primary construction on the Site, that being the original school building at the North End of the Site, took place on or slightly before 1904. There followed two building extensions in a southerly direction, of similar construction and architecture as the original building, the first building extension was constructed in 1940 in order to provide additional classrooms to the School, the second building extension was constructed in 1970 to house a Gym. A single-story administration annexe was added to the north east side of the original building, around the same time. Since that time there have been several modifications, aesthetic improvements, and restorations to the building to improve its occupational functions as well as upgrades to meet code and regulatory compliances. The Site is zoned Urban Residential.

The Client retained B.E.P.I to provide an evaluation of known and possible environmental issues at the Site as requested to facilitate the conditional sale of the Site. The work has also been requested for “financial purposes”.

B.E.P.I Environmental Consultants commenced a Site reconnaissance on October 9, 2019 to evaluate possible on-Site issues and assess whether any surrounding land uses may have impacted or are currently impacting the environmental condition of the Site. B.E.P.I was accompanied by the Charlie Dally (Site Representative), during the Site investigation, and were given full access to all areas of the Site.

Discussions:

Asbestos Containing (ACM):

Asbestos Abatement was completed by the owner at the time, relying on the findings of the ACM survey performed by Eric Ruggles of Enspec who confirmed that all visible and accessible asbestos-containing material had been removed from the Site. See. Appendix D, the Letter of Confirmation from Enspec provided to B.E.P.I from the Owner.

Findings:

Based on the Results of the Phase I ESA completed by BEPI , there are areas of potential environmental concern on the site but not in the 250 metre Study Area. These areas of concern can be addressed by performing a Designated Substance Survey which is an OHSA regulatory requisite, prior to the proposed Demolition; as such at this point there is not a requirement for a Phase

Recommendations:

The following is recommended:

- a DSS Survey be completed
- the Demolition Waste Materials be removed from site.

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2.0 INTRODUCTION

2 (A) PHASE ONE PROPERTY INFORMATION

2.1 Background

Charlie Dally (the Owner/Client), retained B.E.P.I Environmental Consultants to conduct a Phase I Environmental Site Assessment (ESA), in April 2016, of a property located at 321 Devine Street, Sarnia, Ontario, namely the former Devine Street Public School, hereinafter called the Site. The Site is presently unoccupied/vacant as of September 2010.

The contact information for the Site at the time is as follows:

Charlie Dally, Property Owner
1949 Elprado street, Brights Grove, Sarnia, ON NON 1C0
Phone :(306) 241-6898

The Site is a regularly shaped property located on the east side of Brock Street Sarnia, in the proximity of the intersection of Brock and Devine Street. The Site is currently described as containing a two-storey brick School building, with a single story annexe attached to the north east corner of the School building, and with an adjacent asphalted parking lot to the west, and a grassed rectangular area to the south of the school building extending to the southern property limit. Figure 2 illustrates the lot configuration of the Site.

The Client retained B.E.P.I to provide an evaluation of known and possible environmental issues at the Site as requested to facilitate the conditional sale of the Site. The work has also been requested for internal “due diligence”.

A Phase I ESA is defined as a systematic qualitative process to assess the environmental condition of a Site based on its historical and current use.

The Site’s physical location, municipal address and legal description are as follows:

2.2 Municipal Address

The Site’s municipal address is as follows:

321 Devine Street, Sarnia, Ontario

The Legal Description is as follows:

Lot 8, 9 and 10 plan 16 1/2 Sarnia city

2.3 Physical Location

The Site is located in Sarnia, Ontario and is rectangularly shaped property on the north east side of Brock Street at the Devine and Brock Street Intersection, having a north facing frontage on Devine Street. Figure 2 illustrates the lot configuration of the Site. The Site is zoned for Urban Residential.

The nearest major water body to the Site and Study Area is the St. Clair River. The St. Clair River is located approximately 0.74 kilometers west of the Site. The St. Clair River flows south and discharges into Lake St. Clair, located approximately 45 kilometers southwest of the Site.

NOTE: The street orientations in the area follow a well-defined north-south, east-west pattern. For the purpose of this report Brock Street is deemed to be a north-south artery and all direction references are made relative to that designation.

2.4 Geographic Co-ordinates

The Site's geographical co-ordinates were digitized from satellite photography. The geographical co-ordinates were recorded on October 9, 2019 at the approximate interpreted "centroid" of the Site. The geographical co-ordinates are expressed in latitude and longitude. The Site's co-ordinates are reported to be:

Latitude: 42°57' 49.07"
Longitude: 82° 24' 14.37"

2.5 Site Ownership

The Site was currently owned by Mr. Charlie Dally.

3.0 SCOPE OF WORK

a. The Scope of Work for the Phase I ESA consisted of the completion of the following tasks:

- Conducted a review, consisting of inquiry, discussion and observation, of the current use of the property and the current and historical practices or operations that may have environmentally impaired the property.

- Conducted a visual assessment of the Site in order to identify indications of the presence of environmental contaminants or concerns of significance.

- Contacted appropriate provincial and municipal regulatory agencies in an attempt to determine whether any records of environmental regulatory non-compliance exist (i.e. sewer use by-law, waste manifesting and disposal, underground fuel storage tanks, etc.) and review such records where available.

B.E.P.I conducted a Site reconnaissance on October 9, 2019 to evaluate possible on-Site issues and assess whether any surrounding land uses may have impacted or are currently impacting the environmental condition of the Site. B.E.P.I was accompanied during the Site visit by the Owner and were given full access to all areas of the Site.

NOTE: The use of the word “significant” in this document refers to the Site conditions, findings and/or conclusions that are inferred to have an impact on the environmental condition of the Site.

4.0 RECORDS REVIEW

4 (a) General

The Regulation requires a comprehensive review of records and documentation pertaining to the Site ownership and other relevant information that will provide an assessment of possible influences to the Site that may have impacted its environmental condition. Information pertaining to the review of records is presented herein.

4 (a) (i) Phase I Study Area Determination

The Regulation also requires that a "Phase I Study Area Determination" (SAD) be provided. A SAD is described in the Regulation as properties located wholly or in part within 250 metres from the Site boundaries. Properties within the SAD area (also referred to herein as the "Study Area") must be considered and evaluated for their relevance as possible sources of environmental impact to the Site.

The Study Area of the Phase I ESA for the property located at 321 Devine Street, Sarnia, Ontario, consists of properties located wholly or partly within 250 metres of the Site boundaries. The approximate extent of the Study Area is referenced in Figure 3.

4 (a) (ii) First Developed Use Determination

The site was developed in 1904, that being the Devine Street Public School.

4 (a) (iii) Environmental Reports

B.E.P.I is aware of two environmental report, one being the Asbestos Containing Material Survey reported completed for the Site in 2008, prepared by T. Harris Environmental Management Inc. and the other is the Asbestos Assessment Survey report prepared by Golder Associates completed in 2009 which confirmed the presence of asbestos in ceiling tile, mechanical piping, flooring and drywall, and the report also recommended leaving the asbestos in place until the building is demolished or undergoes major upgrading because it's not hazardous unless disturbed. B.E.P.I does not have a copy of this report at the time of preparation of this ESA.
A Notice of Project has been filed by the owner in accordance with The Occupational Health & Safety reference eNOP I.D.12eN223428 for Mild Interior Demolition Identifying Asbestos has being an identified designated substance.

4 (a) (iv) City Directories

B.E.P.I searched the City Directory from the Eris (Environmental Risk Information Services) files and the Sarnia Library City Registry. These combined searches were

from 1877 to 2015 in random increments and were cross referenced from 1999 to 2015 by Google Earth files.

Nothing of significance was discovered during this search. The City Directory listings can be found in Appendix A.

4 (b) Environmental Source Information Eris Report

National Pollutant Release Inventory (Environment Canada) (Reference 2)

B.E.P.I reviewed the National Pollutant Release Inventory database for the years of 1993-2012. The Site was not observed in the database.

Certificates of Approval, Permits to Take Water (PTTW) and Other Environmental Instruments

Environmental Documents	Description
Certificates of Approval	B.E.P.I was not aware of any Certificates of Approval listed for properties within the Study Area.
PTTW	B.E.P.I was not aware of any permit to take water for the Site or properties within the Study Area.
Other	B.E.P.I was not aware of other environmental documents and certificates for the Site or properties within the Study Area.

Records Concerning Environmental Incidents

B.E.P.I was not aware of any records indicating environmental incidents involving the Site.

Radon

Background

Radon is a naturally occurring colourless, odourless and tasteless gas produced by the decay of Uranium-238 that may be found in geological formations of granite, sandstone, coal, phosphate and uranium deposits. Radon is heavier than air. It may enter sub-surface building spaces (e.g. basements and underground parking garages) through cracks and / or joint openings. Radon can also migrate into sewers. The Ontario Building Code identifies some areas in Ontario to be susceptible to radon impact. These areas are Elliot Lake, the Township of Faraday in Hastings County, and the Township of

Hyman in the Sudbury District. Building construction in these areas must include special provisions for ventilation and / or vapour barriers to control the concentration of radon inside the living envelope of the building.

Findings

The location of the Site was evaluated against the previously referenced locations and the locations of a soil radon gas study published by the Ontario Geological Survey (OGS) entitled Soil Radon Gas Study of Southern Ontario (OGS, Open File Report 5847, 1993) (Reference 8). The City of Sarnia and the location of the Site are not within the four main study areas investigated by the OGS. B.E.P.I is not aware of other records of the presence or emission of radon gas in the immediate area of Sarnia, Ontario. Radon gas is interpreted not to be a significant environmental issue at the Site.

Environmental Reports Submitted to MOE for Study Area

B.E.P.I was unable to locate any reports that were submitted to the MOE for the Study Area.

Brownfield Environmental Site Registry

Properties that have a *Record of Site Condition* (RSC) registered with the MOE are listed in the "Brownfield Environmental Site Registry" (BESR). B.E.P.I searched the BESR for the property municipal address of the Site. The Site was not listed as having a RSC filed with the MOE. No properties within the study area were listed as having a RSC filed with the MOE.

Waste Disposal Site Inventory

B.E.P.I reviewed the document entitled *Waste Disposal Site Inventory*, prepared by the Waste Management Branch of the MOE (dated June 1991). An initial review of this document indicated that no active or closed landfills were located within 1 kilometre of the Site.

Hazardous Waste Generators and Receivers

The Ontario Regulation 347 Waste Generators Summary was searched as part of the EcoLog ERIS search commissioned for the Phase I property and all properties within 250m of the Site. A summary of the information is provided below:

Phase I Property:

- There are no records of waste generators and receivers on the Phase I property.

Adjacent/Neighbouring Properties:

- There are no records of waste generators in the adjacent/neighbouring properties of the Phase I Study Area.

Environmental Registry:

Included in the ERIS report was a search of the Environmental Registry database for all properties within the Study Area. Where necessary, B.E.P.I also searched Ontario's online Environmental Registry in order to acquire additional details relating to any instruments identified.

Records of Site Condition (RSC):

The ERIS report included a search of the Record of Site Condition database for all properties within the Phase I Study Area. Based on the information provided, no Records of Site Condition are listed for the Phase I Study Area.

EcoLog Environmental Risk Information Services Ltd.

EcoLog Environmental Risk Information Services Ltd. ('ERIS') is a national service that provides site specific environmental and property-use information. ERIS reports contain detailed government and private sector records concerning possible environmental liabilities associated with properties and their surrounding neighbourhoods. For the work undertaken herein, an ERIS report is not required for a ESA Phase I, however was obtained as due diligence and may be referenced in Appendix A.

No EcoLog ERIS entries were found for the subject Site.

Based on B.E.P.I's review of the above-noted information sources, it is unlikely that any of the listings noted above have had a physical impact on the soil and groundwater of the subject Site.

4 (c) Physical Setting Sources

4 (c) (i) Aerial Photographs

Aerial photographs of the Site were available for review from the Lambton County GIS Online web service as well as Google Earth and the National Archive. B.E.P.I reviewed available aerial photographs providing coverage of the Site for the years of 1999 to 2014 The following significant information was inferred from the information reviewed:

Date	Site	Surrounding Properties
1999	The site appears to be developed with the existing building present	The surrounding properties residential and commercial appear to be developed referenced to the present date.
2005	The site appears to be developed with the existing building present	The surrounding properties residential and commercial appear to be developed referenced to the present date.
2006	The site appears to be developed to the current state.	The surrounding properties residential and commercial appear to be significantly developed referenced to the present date.
2011	The site appears to be developed to the current state.	The surrounding properties residential and commercial appear to be developed referenced to the present date.
2019	The site appears to be developed to the current state.	The surrounding properties residential and commercial appear to be developed referenced to the present date.

4 (c) (ii) Topographic, Geologic and Hydrogeologic Setting

Topic	Findings
Topography of Site and Surrounding Area	The Site and surrounding area are generally flat.
Site Grade Relative to the Adjoining Properties	The Site is at the same grade as the surrounding properties. Surrounding properties have been graded to allow drainage to the storm sewers on Brock & Devine Street.
Subsurface Soils	Modern alluvial deposits consisting of clay, silt, sand and gravel. May contain some organics.
Fill Materials	None observed and none were reported by the Site owner.
Bedrock Type	Bedrock of the Middle Devonian Age Dundee

	Formation
Inferred Bedrock Depth	Inferred bedrock depth is >25 m below ground surface.
Inferred Groundwater Depth	Based on historical well records, the depth to groundwater in the study area is inferred to be 3.0 – 4.5 m below ground surface.
Nearest Open Water Body	The St. Clair River is located approximately 0.74 kilometer west of the Site. The St. Clair River flows south and discharges into Lake St. Clair, located approximately 45 kilometers southwest of the Site.
Inferred Groundwater Flow Direction	West based on the nearest body of water.

4 (d) Site Operating Records

The following Site operating records for review are summarized as follows:

Item Number	Name of Document	Summary of Information
I	Regulatory permits and records related to areas of potential environmental concern,	None available at time of Site reconnaissance.
II	MSDS	None available at time of Site reconnaissance.
III	Underground Utility Drawings	None available at time of Site reconnaissance.
IV	Inventories of chemicals, chemical usage and chemical storage areas	None available at time of Site reconnaissance.
V	Inventory of USTs and ASTs	None available at time of Site reconnaissance.
VI	Environmental monitoring data, including data created in response to an order or request of the Ministry	None available at time of Site reconnaissance.
VII	Waste management records, including current and historical waste storage locations and waste generator and waste receiver information maintained pursuant to Regulation 347 of the Revised Regulations of. Ontario, 1990 (General — Waste Management) made under the Act, or its predecessors	None available at time of Site reconnaissance.
VIII	Process, production and maintenance documents related to areas of potential environmental	None available at time of Site reconnaissance.

	concern	
IX	Records of spills and records of discharges of contaminants, including records of spills and records of discharges of contaminants of which notice is required to be given to the Ministry under the Act and records of such spills and discharges required to be kept pursuant to Ontario Regulation 675 / 98 (Classification and Exemption of Spills and Reporting of Discharges) made under the Act,	None available at time of Site reconnaissance.
X	Emergency response and contingency plans, including spill prevention and contingency plans prepared pursuant to section 91.1 of the Act, and Ontario Regulation 224 / 07 (Spill Prevention and Contingency Plans) made under the Act	None available at time of Site reconnaissance.
XI	Environmental audit reports	None available at time of Site reconnaissance.
XII	Site plan of facility showing areas of production and manufacturing.	None available at time of Site reconnaissance.

5.0 SITE RECONNAISSANCE

5 (a) General Requirements

5 (a) (i) Date and Time of the Site Reconnaissance

The Site reconnaissance was conducted on October 9, 2015. It commenced at 12:45 PM and ended at approximately 1:45 PM. A total of one hour was spent on-Site and in the Study Area during the reconnaissance.

5 (a) (ii) Weather Conditions

Weather conditions at the time of the Site reconnaissance consisted of clear skies. Air temperature was approximately 10° Celsius. Wind direction was S.W. at 10 km/h

5 (a) (iii) Length of Time of the Site Reconnaissance

The Site reconnaissance was completed over a period of one hour.

5 (a) (iv) Operation Status of the Site

The Building (former Devine Street Public School) at the site is vacant/unoccupied, and is destined for sale and/or demolition, at the time of B.E.P.I's Site reconnaissance.

5 (a) (v) Name and Qualifications of the Site Assessor

Bryan Ball M.Sc. Cert. Eng.

PROJECT MANAGER

Mr. Ball is a Project Manager with B.E.P.I. He completed his undergraduate degree in Engineering in Plymouth University in 1973, and an intermittent lecturer in Oxford University

Mr. Ball has been involved with the management of projects during his time at B.E.P.I, Dow Chemical, AMEC, and Western Australian Petroleum over the last 40 years. These Projects have included Phase I and II Environmental Site Assessments, Large Scale Remediation Projects, and Asbestos and Mould Identification Surveys. He has also provided technical support on projects involving the abatement of mold and asbestos, and the preparation of Remedial Action Plans (RAPs). He has personally completed several Phase I and II Environmental Site Assessments in accordance to the CSA Standards and Ontario Regulation 153/04. Additional work undertaken has included the auditing of other consultancy firms work and the preparation of applications for the filing of Records of Site Condition (RSC), and Certificates of Approval. The work previously referenced was undertaken on behalf of Clients at properties located across Southwestern Ontario, including residential, commercial, and industrial properties.

Mr. Ball is also experienced in technical fieldwork associated with the drilling of boreholes and installation of monitoring wells, including the acquisition of hydrogeological and soil data. Previous work has included the collection of samples from various media for the purposes of laboratory analysis. Additionally, he has been involved with project research, proposal preparation, data analysis, general office support, and the preparation of figures, tables, and reports.

5 (a) (vi) Site Photography

Digital photographs of the Site were taken during the Site reconnaissance. A photographic log of the Site reconnaissance including detailed descriptions of the images taken are summarized below.

Site Photography of the Property

Digital photographs of the property may be referenced in Appendix D. Photographs detailing the Site are as follows:

Location: 321 Devine Street, Sarnia, Ontario	Date: October 9, 2019
Photographic Plate Number	Description (Direction of Photo)
1	Looking northeast, view of the School Building.
2	Looking southeast, view of the School Building.
3	Looking north, view of the School Building, and abutting adjacent field.
4	Looking at north east side of School Bldg.
5	Looking east , at a storage shed located north east of School Bldg
6	Looking north at view of Annex located at east of School Bldg.
7	Looking north over Devine Street, to Air Cadets Bldg,
8	Looking north over Devine Street, to Residential Area
9	North view of " Inn of the Good Shepherd" property located North East of the School Bldg,
10	Looking south across the field at the neighboring residential area
11	Northwest Entrance to the School Bldg.
12	Asphalted parking lot west of the School Bldg.
13	Wooden framed Basement windows. (Typ.) west side of Bldg.
14	Northeast of Bldg. view of an old shed foundation
15	View of playground at the north east side of the Bldg.
16	Brock St. Pole Transformer non-PCB
17	Transformer located on west side of the Main Building.
18	Scrap metal in basement area.
19	Former gas heater in the basement Utility Room
20	Non ACM insulation in Basement Utility Room
21	View showing ACM floor tile and ceiling removed in older north section of the school bldg.
22	View showing ACM floor tile , wall and ceiling removed in older north section of the school bldg.
23	View showing ACM floor tile , and ceiling removed in older north section of the school bldg.
24	View showing ACM floor tiles removed in older north section of the school bldg.

5 (b) Specific Observations at the Phase One Property (the Site)

5 (b) (1.0) General Description of Structures

The Site is located in Sarnia, Ontario and is rectangularly shaped property on the north east side of Brock Street at the Devine and Brock Street Intersection, having a north facing frontage on Devine Street. Located on the North end of this property is a 2 storey brick building, described as the Main School building of the former Devine Street Public School. A single storey annexe is attached at the north east corner of the Main School Building.

5 (b) (2.0) Below Ground Structures

The Building has a Basement.

5 (b) (3.0) Tanks

Background

The storage of fuel in tanks in Ontario is governed by Regulation 217 (Liquid Fuels), Regulation 213 (Fuel Oil) and Codes of the Ontario Technical Standards and Safety Act (TSSA). These regulations (including CSA Standard B-139) outline requirements pertaining to the design, construction, installation and removal from service of underground storage tank (UST) systems. Also outlined is the requirement for removal of petroleum hydrocarbon contaminated soil, where identified, while tank removal is being undertaken. In addition, the TSSA outlines requirements pertaining to in-ground hydraulic hoist systems.

Findings

5 (b) (3.1) Aboveground Storage Tanks (ASTs)

None observed during the Site reconnaissance.

5 (b) (3.2) Underground Storage Tanks (USTs)

No evidence of underground storage tanks was observed. No documentation was found by B.E.P.I personnel from all available sources of information – including documentation and records from the Technical Standards and Safety Authority. As such, underground storage tanks are not a concern at the Site.

5 (b) (4.0) Water Sources

The Site water supply is serviced by the municipal water supply system. Water is supplied via the Lambton Area Water Supply System (LAWSS) of Sarnia-Lambton, which obtains its municipal water source from Lake Huron via a pipeline.

5 (b) (5.0) Building Features

The 2 storey brick construction, described as the Main School building of the former Devine Street Public School with a single storey annexe has been prepared for sale/demolition and it appears that some ceiling tiles, mechanical piping insulation, floor tiles and drywall have been removed. This can be seen in Appendix B- Log of Photographic Plates.

5 (b) (5.1) Exit and Entry Points

The Site can be accessed along one frontage driveway off Brock Street.

5 (b) (5.2) Heating System

The original heating system was a hot water /radiator heating. This is now no longer functional and many of the cast radiators and associated piping etc. have been removed.

5 (b) (5.3) Cooling System

There is no functional cooling system present in this Building.

Background

Ozone-depleting substances include chemicals containing chlorofluorocarbon (CFC), Hydrochlorofluorocarbon (HCFC), halon or any other material capable of destroying atmospheric ozone. ODSs have been used in many products such as rigid polyurethane foam and insulation, laminates, aerosols, refrigerants, fire extinguishers and cleaning solvents. Federal regulations require the elimination of HCFC-22 (a.k.a. Freon 22) by 2020. Refrigerants containing CFCs, hydrofluorocarbons (HFCs) and HCFCs are regulated in Ontario by the Refrigerants Regulation (Regulation 189 / 94) made under the EPA. CFCs should not be released into the natural environment.

Findings

CFC is not an environmental concern on the site.

5 (b) (5.4) Drains / Pits / Sumps

Background

Liquid wastes are commonly collected and conveyed in sumps, floor drains, pits, trenches and lagoons. The physical condition of such structures is important to maintain control and prevent leakage of liquid wastes.

Findings

No liquid waste sumps, pits, or drains were observed on-Site. A non-functional standard sump pump was observed in the basement.

5 (b) (5.5) Stains in Proximity to Discharge Locations

At the time of the Site reconnaissance, significant staining was not observed on-Site,

5 (b) (5.6) Potable and Non-Potable Water Sources

Municipal Water

The Site water supply is serviced by the municipal water supply system. Water is supplied via the Lambton Area Water Supply System (LAWSS) of Sarnia-Lambton, which obtains its municipal water source from Lake Huron via a pipeline.

Wells

Background

Ontario Regulation 903 (O. Reg. 903) provides standards for the construction, maintenance and decommissioning of water supply wells in the province. O. Reg. 903 requires that any well, which is not in use or maintained for future use, must be decommissioned in accordance with the protocols set out in the regulation. O. Reg. 903 also applies to any test well installed for environmental or geotechnical purposes.

Findings

No wells were observed on-Site.

Other Water Sources

No additional water sources were observed during the Site reconnaissance.

5 (b) (5.7) Sewage Works

The Site is connected to the municipal sewer system.

5 (b) (5.8) Surface Cover

The Site is a regularly shaped property located on the east side of Brock Street Sarnia, in the proximity the intersection of Brock and Devine Street. The Site is currently described as containing a two-storey brick School building, with an adjacent asphalted parking lot to the West, and a grassed rectangular area to the south of the school building extending to the southern property limit. The total site area was estimated to be 12,290.5 m^2 in size (approximately 3 acres, 1.2 hectares). The building footprint area including the annex is 2,021 m^2 in size (16.5%) the asphalted parking lot area is 3,507 m^2 in size (26.5%), and the south field is 3,897 m^2 in size (31.5%), the remaining area is at the east side of the building.

5 (b) (5.9) Railway Lines or Spurs

No railway lines or spurs were noted in the study area.

5 (b) (5.10) Areas of Stained Soil, Vegetation or Pavement

During the Site reconnaissance no significance evidence of stained soil, vegetation, or gravel was observed.

5 (b) (5.11) Stressed Vegetation

During the Site reconnaissance evidence of stressed vegetation was observed at the grass verge at the east side of the building encroaching on the boundary of the neighbouring property of the “Inn of the Good Shepherd”, in the proximity of a storm drain. This appears to be caused by neighbour waste being thrown over the fence to the subject Site.

5 (b) (5.12) Fill or Debris Materials

Background

The environmental quality of materials (known as “fill material”) used to in-fill low-lying areas of a property is of a concern when assessing a property for possible environmental contamination. In order to assess the quality of fill materials, sampling and chemical analysis is required following which the results must be evaluated against a regulatory criterion. Regulation 153 / 04, as amended July 1, 2011, of the Ontario EPA

provides a standard for assessment and remediation of soils and groundwater in Ontario. The standards and criteria presented in O. Reg. 153 / 04 vary depending on whether the Site is defined as "environmentally sensitive", on the nature of the land use, and whether groundwater is used as a potable water source.

Findings

Observations made at the time of the Site reconnaissance indicated no fill had been added to the site.

5 (b) (5.13) Potentially Contaminating Activities (PCAs)

PCAs for a Phase I Environmental Site Assessment are detailed in Ontario Regulation (O. Reg.) 153 / 04, as amended July 1, 2011, in Table 2 of Schedule D, Phase One Environmental Site Assessments. PCAs were not observed on-Site but present in the Study Area. They are discussed in further detail in Section 6.

5 (b) (5.14) Unidentified Substances

At the time of the Site reconnaissance, no unidentified substances were observed on the property.

5 (b) (5.15) Adjacent Land Uses

B.E.P.I reviewed the current land uses of neighbouring properties from publicly accessible locations to assess possible environmental impacts to the Site that may arise from off-Site operations.

Land use in the Study Area consists of mainly of residential use. The Sarnia zoning map identifies the area of the Site as "Urban Residential". Properties surrounding the Site are summarized as follows:

North of the Site

To the north of the Site is the Air Cadets Building fronting on to the east side of Brock Street.

East of the Site

To the east of the Site is the "Inn of the Good Shepherd" fronting on to the south side of Devine Street.

South of the Site

To the south is a residential area fronting on to the east side of Brock Street

West of the Site

To the west of the Site, is a residential area fronting onto the west side of Brock Street

Summary

In summary, based upon observations of the surrounding properties from publicly accessible locations, there are no areas of potential environmental concern.

5 (b) (i) Hazardous Building Materials and Designated Substances

5 (b) (i) (i) Site Operations

The Site is a vacant /unoccupied Site

5 (b) (i) (ii) Hazardous Materials

During the Site reconnaissance potentially, hazardous materials were observed on-Site.

Asbestos

Background

The Ontario Construction Safety Act in 1973 prohibited the use of sprayed-on asbestos. Following that prohibition, major suppliers of pipe and boiler insulation stopped using asbestos containing materials (ACMs). Buildings pre-dating 1990 may contain building materials that use asbestos as a component. Ontario Regulation 278 / 05 made under the Occupational Health and Safety Act presents a course of action to follow for building owners to determine whether ACMs exist in their buildings. Said regulation also presents a course of action to follow if ACMs are present (e.g. repair, remove or manage in place). Managing the ACM in place requires that the building be surveyed so that the ACMs can be identified, their physical condition determined, and the information catalogued (by way of completing an “ACM survey”).

Findings

Asbestos, a known carcinogen, is present in the vast majority of school buildings built before 1980.

A 2009 report prepared by Golder Associates and a 2008 report prepared by T. Harris Environmental Management Inc. confirmed the presence of asbestos in ceiling tile, mechanical piping, flooring and drywall. The T. Harris report recommended leaving the asbestos in place until the building is demolished or undergoes major upgrading because it's not hazardous unless disturbed.

A Notice of Project has been filed by the owner in accordance with The Occupational Health & Safety reference eNOP I.D.12eN223428 for Mild Interior Demolition Identifying Asbestos has being an identified designated substance.

Asbestos Abatement has recently been completed by the owner relying on the findings of the ACM survey performed by Eric Ruggles of Enspec who confirmed, in correspondence, that all visible and accessible asbestos-containing material has been removed from the Site. See Appendix C.

Mould / Fungi

Background

Moulds (also known as fungi) are present everywhere and the most common types of molds are generally not hazardous. However, some molds may be problematic to some people. As the most important factor contributing to the growth of mold indoors is the presence of moisture, exposure to mold may occur indoors on water damaged building materials during occupancy, building maintenance and / or repair operations.

Findings

There was minor Mould observed in several areas of the Building.

Lead

Background

Lead is commonly found in older buildings in two main forms: (1) in a metallic form (e.g. lead solder, lead pipes, lead flashings, electrical connections, etc.); and (2) as a component of some building materials such as paint, glass, pigments, etc. Lead in

drinking water at schools, private schools and day nursery facilities are regulated by Regulation 243 of the Ontario Safe Drinking Water Act.

Findings

Based on the age of this building, there is a potential that LBP is present on the site.

Polychlorinated Biphenyls (PCBs) Electrical Equipment

Background

PCBs were used in electrical transformers manufactured between 1929 and 1977, with the majority being installed in residential and commercial buildings and industrial facilities prior to 1978. “PCB-Contaminated Transformers” known, or assumed under TSCA, to contain between 50 and 499 ppm PCBs are also subject to EPA regulations.
PCB waste is managed by Regulation 362 made under the EPA. The regulation also defines “PCB waste” and the requirements for its storage. PCBs were commonly used in electrical equipment (e.g. transformers, capacitors, light ballasts, circuit breakers, switchgear, etc.) because of its dielectric properties and its ability to sustain high temperatures without deteriorating. The use of PCBs in the manufacture of electrical equipment was prohibited in July 1980. Consequently, equipment manufactured prior to 1980 is suspected to contain PCBs. However, PCBs may still be present in electrical equipment manufactured prior to 1980 that has remained in service since its manufacturing. PCBs may also be present (in a lesser extent) in hydraulic fluids found in hoists / elevator systems, and hydraulic systems.

Findings

During the Site reconnaissance a PCB transformer, which is located outside on the west of the property, appeared older than 1977 and as such has the potential to contain PCB.

Electrical Transformers

Pole-mounted Transformers of the non-PCB type were observed to be located adjacently along the west side of Brock Street. PCB contamination from these sources is not considered an issue.

Capacitors

During the Site reconnaissance, electrical capacitors suspected to contain PCBs were not observed on-Site.

Light Ballasts

Light Ballasts observed during the Site reconnaissance were coded as no PCB present.

PCB Storage Sites

As discussed in Section 4 b, the MOE *Ontario Inventory of PCB Storage Sites* did not list the Site as a PCB waste storage site, nor was any property within the Study Area listed.

NOTE: The MOE no longer provides a database for PCB storage to the public. They cite public safety as the reason. The PCB storage database for 2004 is the last year available to the public.

Radioactive Materials

Background

Radioactive materials in Ontario are controlled by the Canadian Nuclear Safety Commission (a federal regulatory body) under the Federal Nuclear Safety and Control Act. In a broader sense, such materials are also managed by the provincial EPA. Radioactive materials are mostly uncommon in most industrial and manufacturing facilities. Where they are used, such facilities are strictly regulated and identified.

Findings

During the Site reconnaissance, radioactive materials or equipment were not observed at the Site.

Urea Formaldehyde Foam Insulation

Background

Urea formaldehyde foam insulation (UFFI) is injected as a mixture of urea formaldehyde resin, an acidic foaming agent, and a propellant, such as air. It was commonly used in existing houses by injecting the foam into areas, such as behind walls, where it was impractical to provide conventional insulation. After its application, the foam hardens to form an insulating layer. UFFI was banned in Canada in December 1980 after a number of homeowners began to report problems that included respiratory difficulties, eye

irritation, running noses, nosebleeds, headaches and fatigue. Notwithstanding the ban on UFFI and many research papers generated about the topic, the conclusions drawn was that UFFI has not been shown to be a health concern. This conclusion has not eliminated the need in many jurisdictions to disclose if UFFI is present in residential buildings.

Findings

Visual indicators suggesting the presence of UFFI were not observed at the Site. UFFI is not a concern for the Site.

5 (b) (i) (iii) Manufactured Products

During the Site reconnaissance, products were not observed to be manufactured on-Site.

5 (b) (i) (iv) Raw Materials Handling and Storage

During the Site reconnaissance, raw materials were not observed to be on-Site.

5 (b) (i) (v) Drums / Totes / Bins

At the time of the Site reconnaissance there was a 30 ft scrap bin containing scrap metal piping, piping fixtures and general metal scrap.

5 (b) (i) (vi) Oil / Water Separators

At the time of the Site reconnaissance no oil / water separators were observed on-Site.

5 (b) (i) (vii) Vehicles and Maintenance Areas

No vehicle / maintenance areas were noted on-Site during the reconnaissance. The historical information reviewed as part of this investigation indicates that no such areas have ever existed on-Site.

5 (b) (i) (viii) Spills

Observations made during the Site reconnaissance did not indicate that any areas existed on-Site were significant spilling had occurred.

5 (b) (i) (ix) Liquid Discharge Points

At the time of the Site reconnaissance no liquid discharge points were observed.

5 (b) (i) (x) Hydraulic Lift Equipment

At the time of the Site reconnaissance hydraulic equipment was not observed on-Site.

5 (b) (i) (xi) Site Documentation

During the Site reconnaissance no Site operating records or documentation were discovered.

5 (c) Written Description of Investigation

5 (c) (i) Investigation Details

On October 9, 2019 B.E.P.I conducted a Site reconnaissance of the Site located at 321 Devine Street, Sarnia, Ontario. B.E.P.I was accompanied by an owner representative during the Site reconnaissance and were given full access to the Site. The investigation was conducted by performing a walkthrough of accessible areas of the Site and surrounding area.

5 (c) (ii) Areas of Potential Environmental Concern

Lead Based Paint (LBP):

Based on the age of this building, there is a potential that LBP is present on the site.

Polychlorinated biphenyls (PCBs):

There is a high probability that the PCB transformer, which is located outside on the west of the property, is older than 1977 and as such has the potential to contain PCB.

6.0 REVIEW AND EVALUATION OF INFORMATION

6 (i) Current and Past Uses

The Site: 321 Devine Street, Sarnia Ontario	
Years	**Current and Past Uses of the Site**
- 1904	The site was a vacant field
1904 - Present	The Site is presently occupied by the Building known as the former "Devine Street Public School".

6 (ii) Potentially Contaminating Activities

The Ministry of the Environment (MOE) has identified no *"Potentially Contaminating Activities"* (PCA) on this site specific for identified activities listed in Table 2 of O. Reg. 153 / 04, as amended July 1, 2011.

6 (ii) (i) On / In / Under the Site

The Ministry of the Environment (MOE) has identified no *"Potentially Contaminating Activities"* (PCA) on this site specific for identified activities listed in Table 2 of O. Reg. 153 / 04, as amended July 1, 2011.

6 (ii) (ii) Potentially Contaminating Activities within the Study Area

The Ministry of the Environment (MOE) has identified one *"Potentially Contaminating Activities"* (PCA) on this site specific for identified activities listed in Table 2 of O. Reg. 153 / 04, as amended July 1, 2011.

1) Ontario Spills (SPL) - A search of the SPL database, dated 1988-Feb 2019 has found that there are 1 SPL site(s) within approximately 0.25 kilometers of the project property. This occurred at 134 Margaret St. and was made by Sarnia Hydro. The spill was a cooling system leak due to increment weather. The spill was cleaned.

6 (iii) Areas of Potential Environmental Concern

There are Areas of Potential Environmental Concern being:

LBP & PCBs. See Conclusions in section 7

6 (iii) (ii) Absence of Information

At the time of B.E.P.I's Site reconnaissance the entirety of the Site was accessed. B.E.P.I was not aware that there was 'absent' information that could potentially affect the report conclusions.

7.0 CONCLUSIONS

Findings:

Based on the Results of the Phase I ESA completed by BEPI , there are areas of potential environmental concern on the site but not in the 250 metre Study Area. These areas of concern can be addressed by performing a Designated Substance Survey which is an OHSA regulatory requisite, prior to the proposed Demolition; as such at this point there is not a requirement for a Phase

7 (i) Signatures

B.E.P.I has prepared this Phase I Environmental Site Assessment (ESA) for the exclusive use and Charlie Dally (Client/Owner) in evaluating the environmental condition of the Site at the time of B.E.P.I's Site reconnaissance. B.E.P.I will not be responsible for the use of this report by any third party, or reliance on or any decision to be made based on it without the prior written consent of B.E.P.I. B.E.P.I accepts no responsibility for damages, if any, by any third party as a result of decisions or actions based on this report.

This report presents an overview of issues of environmental concern, reflecting B.E.P.I's best judgement using information reasonably available at the Site at the time of B.E.P.I's Site reconnaissance. B.E.P.I has prepared this report using information understood to be factual and correct and shall not be responsible for conditions arising from information or facts that were concealed or not fully disclosed to B.E.P.I at the time of the Site reconnaissance.

In completing the scope of work, B.E.P.I did not conduct any intrusive investigations including sampling, analyses or monitoring. The limitations of the Phase I ESA are specified in Appendix E.

Respectfully Submitted,

B.E.P.I Environmental Consultants
Prepared by:

Bryan Ball, M.Sc.

8.0 REFERENCES

1. Environment Canada. (2015, June 29). *National Pollutant Release Inventory – Online Data Search*. Environment Canada: http://www.ec.gc.ca/pdb/websol/querysite/query_e.cfm

2. Soil Radon Gas Study of Southern Ontario 1993: Ontario Geological Survey, Open File Report 5847.

3. Ministry of the Environment. *Search Records of Site Condition and Transition notices*. Retrieved June 29, 2015, from Brownfields Environmental Site Registry: http://www.ene.gov.on.ca/environment/en/subject/brownfields/STDPROD_075742.html

4. Ministry of the Environment. (1991, June). Waste Disposal Site Inventory. Ontario, Canada: Queen's Printer for Ontario.

9.0 APPENDICES

Report appendices for the Phase I ESA, for the property identified as 321 Devine Street, Sarnia, Ontario, are as follows:

APPENDICES

Appendix A - ERIS ECO Log Report
Appendix B - Aerial Photos
Appendix C - Enspec correspondence related to ACM Abatement.
Appendix D - Site Photographs
Appendix E - Limitations

FIGURE 1
SITE LOCATION


N
321 Devine St
Scale
BEPI
Environmental Site Assessment
Phase I
SITE LOCATION
PROJECT #BEPI 2782
DEC. 2015
FIGURE 1

FIGURE 2
LOT CONFIGURATION

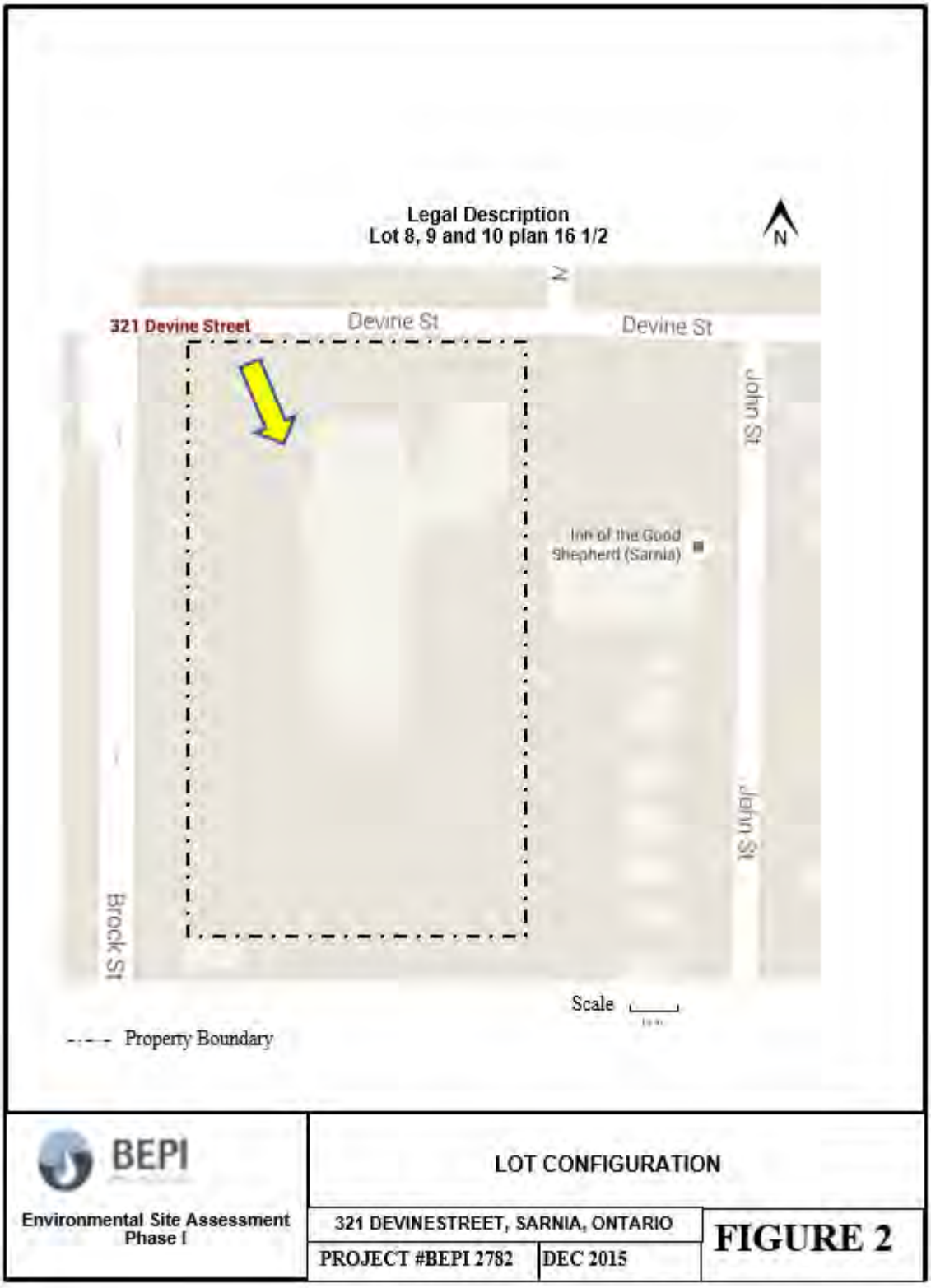
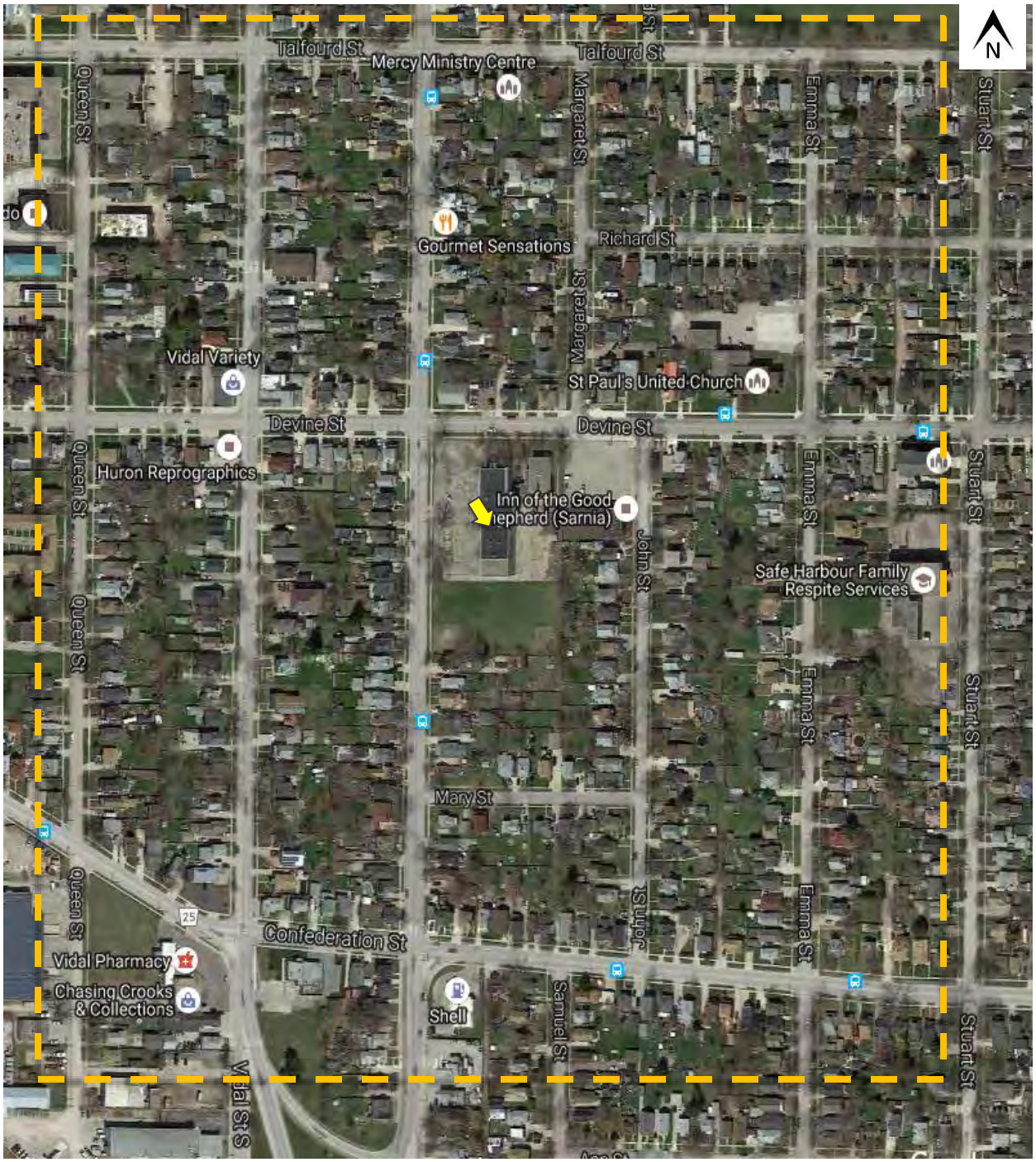

Legal Description
Lot 8, 9 and 10 plan 16 1/2
N
321 Devine Street
Devine St
Devine St
John St
Inn of the Good Shepherd (Sarnia)
John St
Brock St
Scale
Property Boundary
BEPI
Environmental Site Assessment
Phase I
LOT CONFIGURATION
321 DEVINE STREET, SARNIA, ONTARIO
PROJECT #BEPI 2782
DEC 2015
FIGURE 2

FIGURE 3
STUDY AREA



Scale: 0 100 200 50 150 250m

Study Area Boundary

BEPI

Environmental Site Assessment
Phase I

PHASE 1 STUDY AREA DETERMINATION (SAD)
250 metres from Property Boundaries

321 DEVINE STREET. SARNIA, ONTARIO

PROJECT #BEPI 2782 DEC. 2015

FIGURE 3

APPENDIX A
ERIS ECO LOG REPORT

APPENDIX B
AERIAL PHOTOS

BEPI
Environmental Site Assessment
Phase I

Aerial Photo 1949

PROJECT #BEPI 2782

DEC. 2015

Aerial Photo Log


N
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20m
BEPI
Environmental Site Assessment
Phase I
Aerial Photo 1969
PROJECT #BEPI 2782
DEC. 2015
Aerial Photo Log


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Environmental Site Assessment
Phase I
Aerial Photo 2003
Aerial Photo Log
PROJECT #BEPI 2782
DEC. 2015


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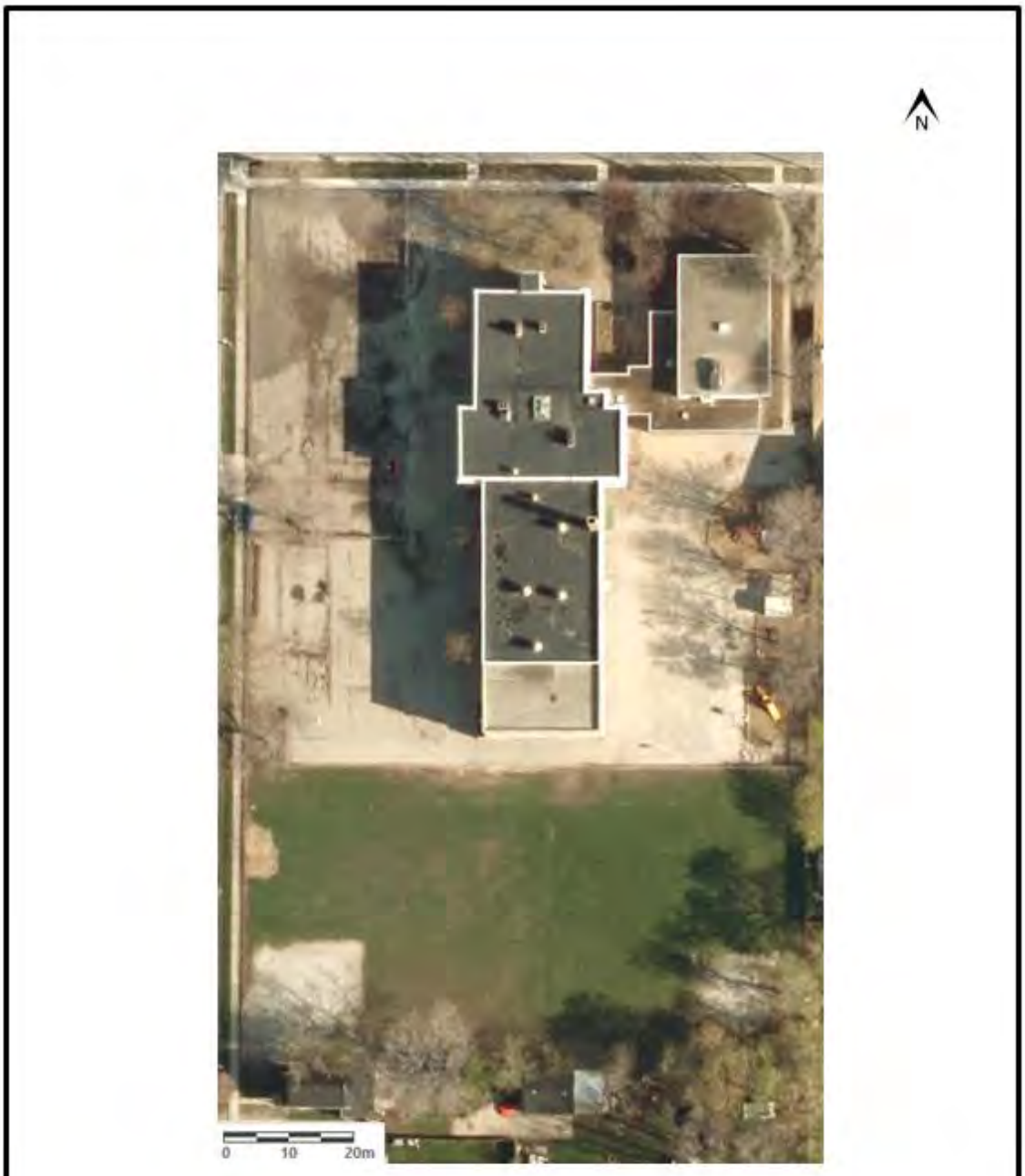
BEPI
Environmental Site Assessment
Phase I
Aerial Photo 2006
Aerial Photo Log
PROJECT #BEPI 2782
DEC. 2015



BEPI
Environmental Site Assessment
Phase I

Aerial Photo 2010

PROJECT #BEPI 2782 | DEC. 2015

Aerial Photo Log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20m
BEPI
Environmental Site Assessment
Phase I
Aerial Photo 2015
PROJECT #BEPI 2782
DEC. 2015
Aerial Photo Log

APPENDIX C
ENSPEC LETTER OF ACM ABATEMENT

ENSPEC INC

October 20th, 2015

Enertec
1949 Elprado Street
Bright's Grove, Ontario
N0N 1C0

Att: **Mr. Charlie Dally**
Property Owner

Re: *321 Devine Street, Sarnia, Ontario*
Asbestos-Containing Material

To Whom It May Concern,

This letter is to confirm that all visible and accessible asbestos-containing material has been removed from the commercial property located at 321 Devine Street in Sarnia, Ontario. Further, all asbestos-containing material was removed in accordance with the measures and procedures set forth in *The Ontario Regulation Respecting Asbestos on Construction Projects and in Buildings and Repair Operations* (*O. Reg. 278/05*).

Please feel free to contact the undersigned if you have any questions.

Regards,

Eric G. Ruggles
Environmental Consultant
Hazardous Materials Specialist

Encouraging New Solutions for People, the Environment and Compliance

P.O. Box 587, Bright's Grove, Ontario N0N 1C0
33 Renata Court, Dundas, Ontario L9H 6X2
Tel: (519) 328.1235
eruggles@enspec.ca www.enspec.ca

APPENDIX D
SITE PHOTOGRAPHS

Photo #21

View showing ACM floor tile and ceiling removed in older north section of the school bldg.

Photo #22

View showing ACM floor tile, wall and ceiling removed in older north section of the school bldg.

Photo #23

View showing ACM floor tile, and ceiling removed in older north section of the school bldg.

Photo #24

View showing ACM floor tiles removed in older north section of the school bldg.

PHOTOGRAPHIC LOG PROJECT BEPI#2782

PHOTOGRAPHIC LOG PROJECT BEPI#2782

Photo #17

Transformer located on West side of the Main Building.

Photo #18

Scrap metal in basement area.

Photo #19

Former gas heater in the basement Utility Room

Photo #20

Non ACM insulation in Basement Utility Room

PHOTOGRAPHIC LOG PROJECT BEPI#2782

Photo #13

Wooden framed Basement windows. (Typ.) west side of Bldg.

Photo #14

North east of Bldg. old shed foundation

Photo #15

View of playground at the north east side of the Bldg.

Photo #16

Brock St. Pole Transformer non-PCB

PHOTOGRAPHIC LOG PROJECT BEPI#2782

Photo #9

North view of " Inn of the Good Shepherd" property located North East of the School Bldg,

Photo #10

Looking South across the field at the neighboring residential area

Photo #11

North West Entrance to the School Bldg.

Photo #12

Asphalted Parking lot west of the School Bldg.

PHOTOGRAPHIC LOG PROJECT BEPI#2782

Photo #5

Looking east , at storage shed located north east of School Bldg.

Photo #6

Looking north at view of Annex located at east of School Bldg.

Photo #7

Looking north over Devine Street, to Air Cadets Bldg,

Photo #8

Looking north over Devine Street, to Residential Area

PHOTOGRAPHIC LOG PROJECT BEPI#2782

Photo #1

Looking north east, view of School Bldg.

Photo #2

Looking south east view of School Bldg.

Photo #3

Looking north, view of School Bldg. and abutting adjacent field.

Photo #4

Looking at north east side of School Bldg.

APPENDIX E
LIMITATIONS

BEPI

LIMITATIONS
NON-INTRUSIVE INVESTIGATIONS / ASSESSMENTS

1. The work performed in this report was carried out in accordance with the BEPI Terms and Conditions made as part of our contract. The conclusions presented herein are based solely upon the scope of services, time and budgetary limitations described by our contract.

2. The report has been prepared in accordance with generally accepted environmental study and / or geoscience practices. No other warranties, either expressed or implied, are made as to the professional services provided under the terms of our contract and included in this report.

3. The services performed and outlined in this report were based, in part, upon visual observations of the property being studied (referred to as the "Site") and attendant structures (referred to as the "Site buildings"). Our opinion cannot be extended to portions of the Site that were unavailable for direct observation, reasonably beyond the control of BEPI.

4. The objective of this report was to assess the environmental conditions at the Site, given the context of our contract, with respect to existing environmental regulations within the applicable jurisdiction. Compliance of past owners with applicable local, provincial and federal government laws and regulations was not included in our contract for services.

5. The Site history research performed herein relies on information supplied by others, such as local, provincial and federal agencies as well as plant personnel. No attempt has been made to independently verify the accuracy of such information, unless specifically noted in our report.

6. Our visual observations relating to potential contaminant materials in the environment at the Site are described in this report. No testing was performed. It should be noted that other compounds or material might be present in the Site environment.

7. The conclusions of this report are based in part, on the information provided by others. The possibility remains that unexpected environmental conditions may be encountered at the Site in locations not specifically investigated. Should such an event occur, BEPI must be notified in order that we may determine if modifications to our conclusions are necessary.

8. The utilization of BEPI's services during the implementation of any remedial measures will allow BEPI to observe compliance with the conclusions and recommendations contained herein. It will also provide for changes as necessary to suit field conditions as they are encountered.

9. Any use or any reliance on or decisions to be made of this report by a third party without the written consent of BEPI, is the sole responsibility of such third parties. BEPI accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions taken based on the unauthorized use of this report.

2014