



SOIL-MAT ENGINEERS & CONSULTANTS LTD.

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PROJECT No.: SM 220069-E

September 30, 2024

CENTENNIAL CONSTRUCTION AND CONTRACTING (NIAGARA) INC.
353 Townline Road
Niagara on the Lake, Ontario
L0S 1J0

Attention: Mr. Joseph Candeloro

**SUPPLEMENTAL ENVIRONMENTAL CONSIDERATIONS
RIVERFRONT – CHIPPAWA PARKWAY
NIAGARA FALLS, ONTARIO**

Dear Mr. Candeloro,

Further to recent email correspondence, SOIL-MAT ENGINEERS & CONSULTANTS LTD. [SOIL-MAT ENGINEERS] is pleased to provide the following supplemental environmental considerations. Specifically, these comments are further to our Environmental Considerations – Soil Characterisation letter [SM 220069-E, dated June 19, 2023]. The purpose of this brief report is to provide comments on the recent questions put forth by the Niagara Region.

The Niagara Region staff has requested clarification on the following;

1) The locations (map) of east and west Pods

- The locations (maps) of the east and west development pods have been referenced from the previous Phase One and Phase Two ESA reports conducted by Wood Inc. The east pod refers to the eastern development lot [also referred to as Block 12] and the west pod refers to the western development lot as they were described at this stage of the project. The location plans have been appended to the end of this letter.

2) Clarification on area BH101 and how that exceedance is being addressed.

- Supplemental sampling was conducted in the area of BH103 and BH429, each located within the East Pod [Block 12], which is the present area of development. This confirmed the previously reported elevated levels of Thallium and Antimony were in fact isolated results, and not considered to be representative.
- It is anticipated that the same situation is the case at BH101, which is located in the northwest corner of the west pod, with the minor elevated Thallium value being isolated and non-representative. However, as this was not part of the development plans at the time further assessment was not yet conducted.

- As the filing of a Record of Site Condition is not required, given there is no change in land use to a more sensitive case, there is no specific requirement to remove the impacted soil. As such, there is not an immediate action required regarding the Thallium exceedance at BH 101. As the borehole is located north west of the proposed development plan at this time it is unlikely that any impacted soils, if in fact present, will be exported from site as excess soils. At such time when this would become necessary additional testing to confirm and delineate the exceedance would be conducted.


3) Clarification on the Use of Table 1 and Table 3 site condition standards. The Report identifies that the soil samples collected by Soil-Mat meet the Table 1 standards and later identifies all soil to meet Table 3 standards,


- Table 1 is the most-strict Standard under Ontario Regulation 406/19 and 153/04, and so our normal practice is for the data to be compared to Table 1 RPI/ICC by default. As the testing conducted was for the purpose of addressing the noted exceedances in the Wood Phase One and Phase Two ESA reports for Thallium and Antimony, by meeting the Table 1 standards for single point compliance, these areas are not considered to exceed the standards. Regarding the site in its entirety, it is proposed for residential development property within a municipally serviced area, and so is considered to have an applicable site condition standard of Table 3 Residential, Parkland, Institutional [RPI]. Data within the Table 1 RPI/ICC Standards, a more strict standard, is automatically within the Table 3 [or Table 3.1] RPI Standards.

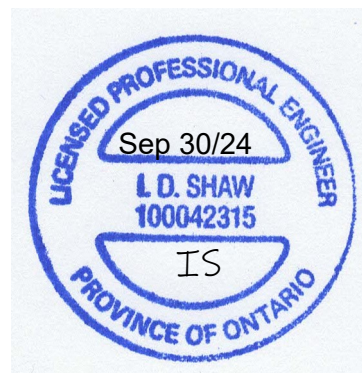
The material in this report reflects SOIL-MAT ENGINEERS' best judgement in light of the information available at the time of preparation. Any use which a third party makes of this report, or any reliance on or decisions to be made based on it, are the responsibility of such third parties. SOIL-MAT ENGINEERS accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this report.

We trust this is satisfactory for your purposes. Please feel free to contact our Office if you have any questions, or we may be of further service to you.

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

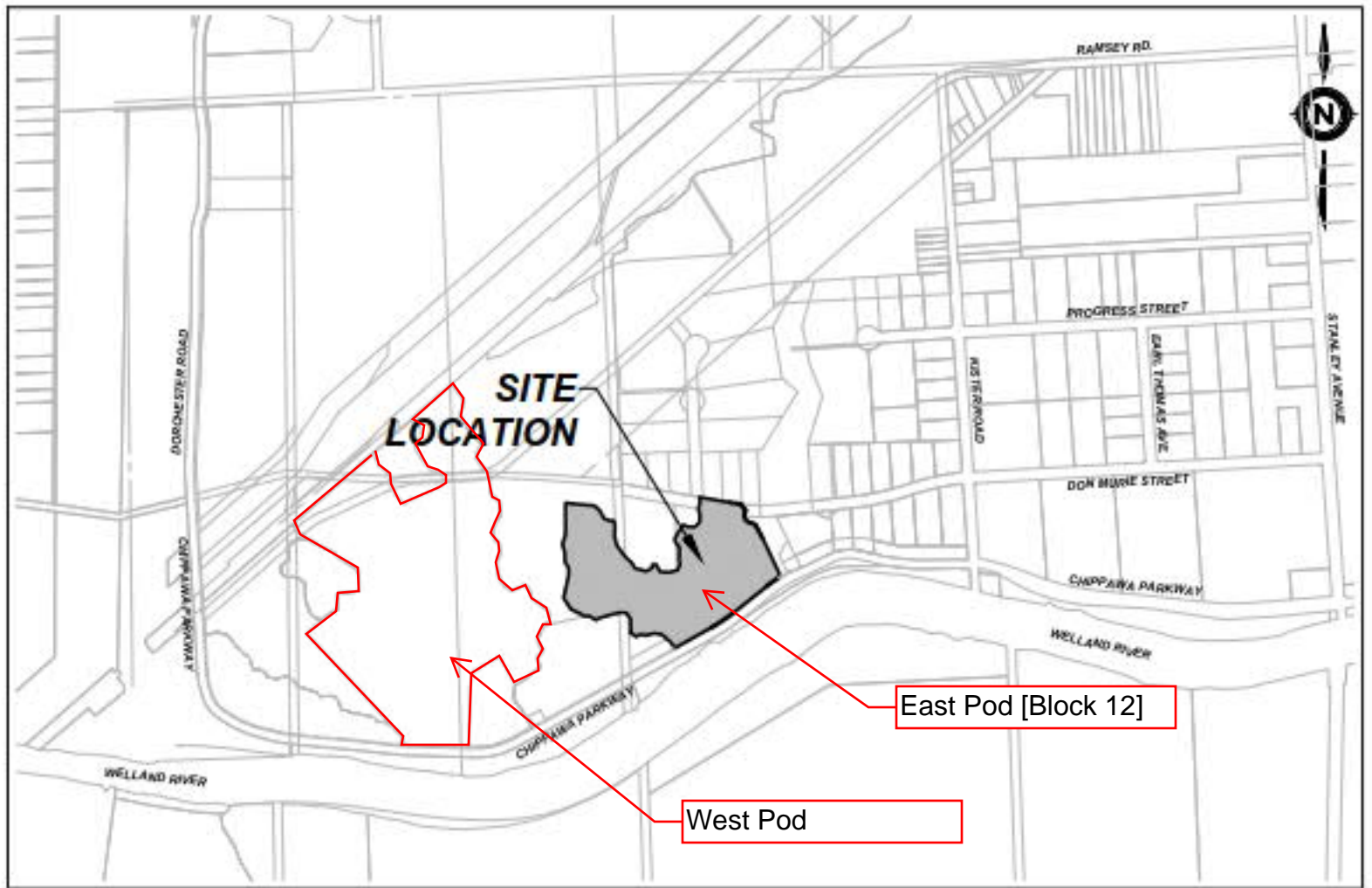

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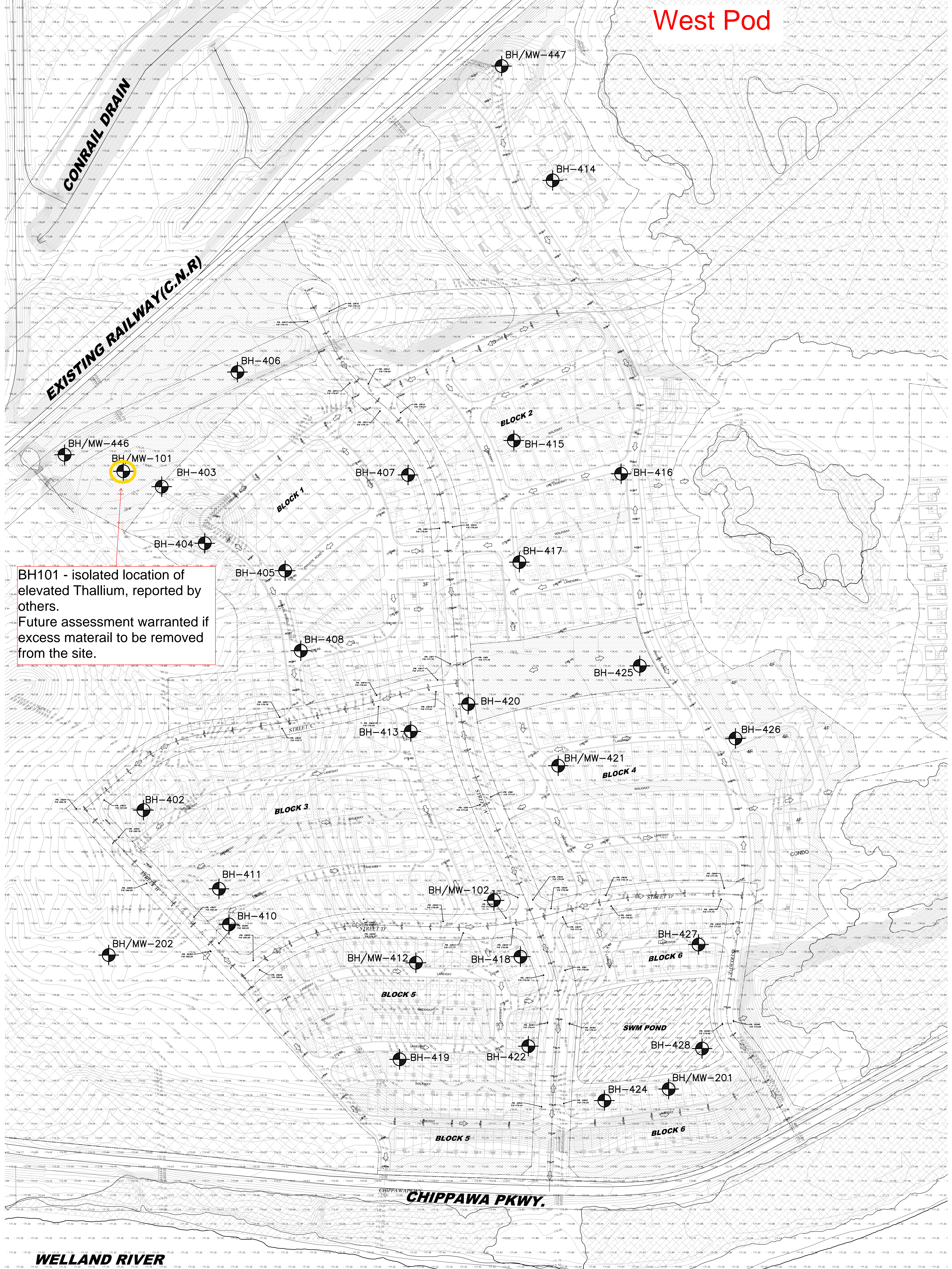
Enclosures: Drawing No. 1, Location Plan

JUNE 2024



LOCATION PLAN (1:10000)

West Pod



BH101 - isolated location of elevated Thallium, reported by others. Future assessment warranted if excess material to be removed from the site.

East Pod [Block 12]

BH429 - isolated location of elevated Antimony, reported by others. Supplemental testing done prior to earthworks demonstrated as non-representative. No further concern.

BH103 - isolated location of elevated Thallium, reported by others. Supplemental testing done prior to earthworks demonstrated as non-representative. No further concern.

