REPORT

Project-Specific Designated Substances and Hazardous Materials Assessment

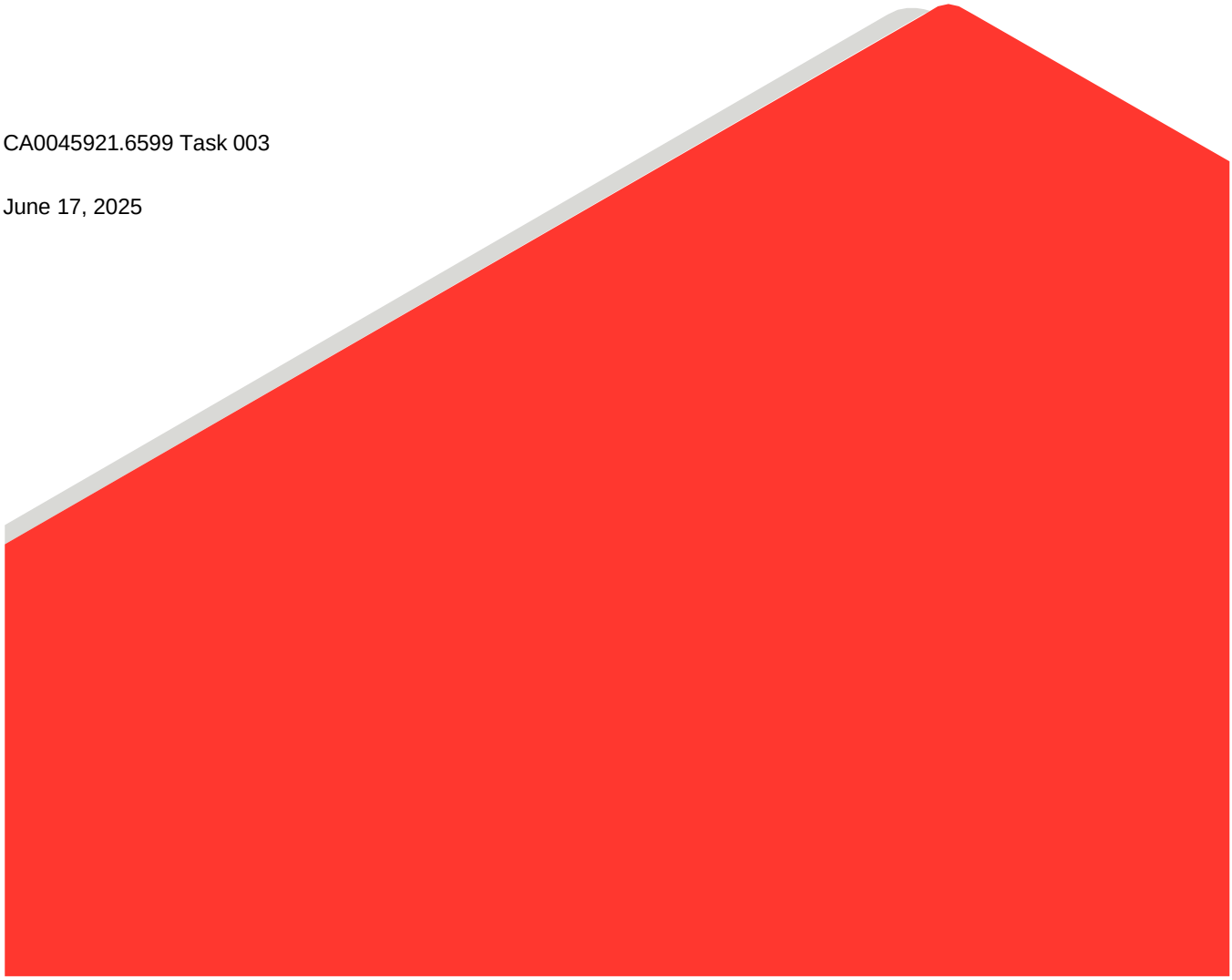
Support of the Building HR26 HVAC Upgrades at CFB Kingston, Ontario

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1.0 INTRODUCTION

WSP E&I Canada Limited (WSP) was retained by Defence Construction Canada (DCC) to conduct a project-specific designated substances and hazardous materials (PSDSHM) assessment related to the HVAC Upgrades Project (DCC Project KN229909; the "Project") for building HR26 at CFB Kingston, Ontario (the "Subject Building").

The PSDSHM assessment was completed on February 25th, 2025, and March 18th, 2025, by Senior Environmental Technician, Raymond Ockrant. The assessment work was conducted in accordance with standards outlined in the DAES Standard on Asbestos- Containing Material in Infrastructure, Ontario Occupational Health and Safety Act, R.S.O. 1990, Chapter O.1, as amended (OHSA), and WSP's project-specific Health and Safety Plan.

2.0 SCOPE OF WORK

Based on the *Statement Of Work (July 2024)* provided by DCC, the Project entails renovations which would require disturbance of the building envelope materials in selected areas within the interior and exterior of the Subject Building.

WSP's scope of work was limited to the following:

- Developing a Site-specific Health and Safety Plan for WSP's work activities (to be submitted to DCC), along with a review and completion of all mandatory project-specific DCC-required health and safety, security and permitting documentation.
- Conducting an intrusive PSDSHM assessment of the selected Project Areas. The PSDSHM assessment was conducted in accordance with applicable regulatory requirements (refer to Regulatory Requirements), the DAES Standard on Asbestos-Containing Material in Infrastructure, and Section 30 of the OHSA.
- Collecting representative bulk samples of suspected asbestos-containing materials (ACMs) and suspected lead, arsenic, mercury, chromium and polychlorinated biphenyl (PCB)-containing paints and submitting these samples to an independent accredited laboratory for standard- one week turnaround time (TAT) analysis, as requested by DCC.
- Providing approximate locations, condition, and quantification of ACMs.
- Providing approximate locations and condition of identified lead, arsenic, mercury, chromium, and PCB containing paints.
- Providing approximate locations and condition of identified PCB-containing caulking.
- Noting other Designated Substances (regulated by the Province of Ontario) and hazardous materials (as proposed in the proposal #2024CA282518 November 19th, 2024), where observed within the Project Areas.
- Preparing one (1) final electronic (PDF) PSDSHM assessment report for the areas assessed (in English only), including a photo log of the sampled materials, figures indicating approximate sample locations, estimated quantities of identified designated substances and hazardous materials, and recommendations for removal and/or management of PSDSHM in the context of the project, as applicable.

All project tasks were performed by a trained and qualified Environmental Health and Safety (EHS) Consultant under the direction of a Canadian Registered Safety Professional (CRSP) and/or a Certified Industrial Hygienist (CIH).

3.0 REGULATORY REQUIREMENTS

The Site is federally regulated, and therefore worker exposure to chemical agents is regulated under the *Canada Occupational Health and Safety Regulations*, SOR/86-304 (COHSR) made under the *Canada Labour Code Part II* (CLC-II) and the DAES Standard on Asbestos- Containing Material in Infrastructure. In addition, the general duty clause of CLC-II requires employers to ensure that the health and safety of their employees is protected.

The COHSR, Part X – Hazardous Substances, lists prescribed requirements for the control of hazardous substances in federally regulated workplaces. Specifically, Section 124 of the CLC-II requires the employer to ensure that the health and safety at work of every person employed by the employer is protected. Furthermore, Section 10.19(1) of the CLC-II requires the employer to ensure that worker exposure to chemical agents do not exceed the recommended limits of the American Conference of Governmental Industrial Hygienists (ACGIH) publication titled *Threshold Limit Values (TLVs) and Biological Exposure Indices*, dated 1994-1995, as amended from time to time.

At the request of DCC, the focus of the PSDSHM assessment was the eleven designated substances, as defined in Ontario Regulation 490/09: *Designated Substances* (O. Reg. 490/09), made under the Ontario Occupational Health and Safety Act (OHSA). Designated substances defined by O. Reg. 490/09 are: acrylonitrile, arsenic, asbestos, benzene, coke oven emissions, ethylene oxide, isocyanates, lead, mercury, silica, and vinyl chloride.

Additionally, testing for total lead, arsenic, mercury, chromium and PCBs in paints and PCBs in caulking's, were also requested. Although designated substances are not defined under federal regulations, they are included to meet the project requirements. Acrylonitrile, benzene, coke oven emission, ethylene oxide, isocyanates and vinyl chloride were not expected to be present at this non-industrial site and therefore no sampling was included for these designated substances; however, they were noted if observed. Under Section 30 of the OHSA, before beginning a project, the owner shall determine whether any designated substances are present at each project site and shall prepare a list of all designated substances that are present at each site.

The PSDSHM assessment and reporting were also performed to meet the requirements of Ontario Regulation 278/05: *Designated Substance – Asbestos on Construction Projects and in Building Repair Operations*, as amended (O. Reg. 278/05), made under the OHSA.

Although not considered designated substances, hazardous materials limited to ozone-depleting substances (ODSs), PCBs, animal waste and visible mould were also included in the assessment.

Further detail regarding regulatory requirements and guidelines are included as Attachment A.

4.0 METHODOLOGY

4.1 Suspected Asbestos-Containing Materials

Sampling of suspected ACMs was conducted following the requirements of O. Reg. 278/05. The number of samples of each "homogeneous material" was collected in accordance with "Table 1: Bulk Material Samples" of O. Reg. 278/05.

Samples were submitted to an independent accredited laboratory, Paracel Laboratories Ltd. (Paracel), in Ottawa, Ontario (Canadian Association for Laboratory Accreditation Inc. (CALA), laboratory membership #A1262) for asbestos content analysis. Polarized Light Microscopy (PLM) was completed in accordance with EPA methodologies and dispersion staining techniques (EPA Method 600/R-93/116) per O. Reg. 278/05.

Materials reported to contain less than 0.5% asbestos (by dry weight), including those referred to as less than the limit of detection (<LOD) or trace, are not considered to be asbestos-containing under O. Reg. 278/05. The LOD is 0.5%. The COHSR defines an ACM to be any material containing 1% or more asbestos by dry weight. For the purposes of

WSP ’s assessment, the O. Reg. 278/05 definition of asbestos was applied as WSP ’s mandate was to review Designated Substances at the Site which are relevant to Ontario.

4.2 Suspected Metals-Containing Materials

Visual assessment, sampling, and analysis of suspected metals-containing materials (MCMs), specifically metals-containing paints (MCPs), were completed. Samples of suspected MCPs were collected using a clean knife and by scraping off a small piece of the suspected MCP. Care was taken to penetrate all paint layers at each sample location.

Paint samples for metals analysis were placed in sealed bags and labelled for submission to Paracel for lead, arsenic, mercury, and chromium analyses.

4.3 Suspected Silica-Containing Materials

Silica is a common component of many building construction materials (i.e., concrete and masonry products). A visual assessment was completed to determine the presence and condition of silica-containing materials (SCMs) within the Project Areas at the Site.

4.4 Suspected Mercury-Containing Materials

Mercury-containing thermostats and fluorescent light tubes and bulbs that may be impacted during the project activities were noted, where observed. Elemental mercury may be present in electrical equipment within the Project Areas at the Site.

4.5 Other Designated Substances

Other designated substances as defined in O. Reg. 490/09 under the OHSA include: acrylonitrile, benzene, coke oven emissions, ethylene oxide, isocyanates, and vinyl chloride. Based on professional experience, these substances are not expected to be present and, as such, no specific sampling of materials potentially containing these substances was undertaken as part of this assessment.

4.6 Ozone-Depleting Substances

An assessment for potential ODS-containing equipment was completed at the Project Areas as part of the assessment, where accessible. ODS-containing equipment such as air conditioners, refrigerators, and freezers were noted, where observed and were a part of the building systems.

4.7 Polychlorinated Biphenyls

Visual assessment, sampling, and analysis of suspected PCB-containing materials (PCMs), specifically paint and caulking, were completed. Samples of suspected PCMs were collected using a clean knife and by scraping off a small piece of the suspected PCM. Care was taken to penetrate all paint layers at each sample location.

Samples for PCB analysis were placed in sealed bags and labelled for submission to Paracel for analysis.

A visual assessment of potential PCB-containing equipment (i.e., fluorescent lighting system ballasts) in the Project Areas was completed as part of the assessment, where accessible. Due to health and safety concerns associated with energized fluorescent lighting systems, connected fluorescent lights were not accessed during the assessment.

4.8 Visual Mould and Animal Waste

A visual assessment for water damage, water staining, discolouration, leakage, fungal staining, and animal waste was completed at the Project Areas, where accessible. The assessment was conducted in general accordance with the procedures outlined in American Industrial Hygiene Association's *Field Guide for the Determination of Biological Contaminants in Environmental Samples – 2nd Edition,* the Environmental Abatement Council of Canada's *Mould Abatement Guidelines*[1] (EACC Mould Guidelines) and the Canadian Construction Association's *Mould Guidelines for the Canadian Construction Industry*[2] (CCA Mould Guidelines).

5.0 GENERAL CHARACTERIZATION OF BUILDING MATERIALS IN THE PROJECT AREAS

During the assessment, WSP made note of the building materials of which the Project Areas comprised. The exterior of the building is mostly brick with some transite paneling. The lower-level mechanical room was only accessible from the exterior of the building and consisted of concrete slab flooring and concrete walls. The interior of the building consists mostly of cement block or brick walls with some gypsum board walls and terrazzo flooring with acoustic tile drop ceilings throughout. The roof structure is flat with asphalt membrane layers on some areas and pebble covered tar layers on other areas.

6.0 PROJECT BACKGROUND

Prior to the PSDSHM assessment, WSP reviewed the previous reports:

- Limited Designated Substances and Hazardous Materials Survey, *Batoche Community Centre Building HR26 Canadian Forces Base Kingston, 32 Lundy's Lane, Kingston, Ontario*, DCC Project No. KN139917, DST Consulting Engineers, March 15, 2014, provided by DCC (DST Report).
- Designated Substance / Hazardous Material Survey, *HR26 (Batoche Community Center), Roof Sections A(South), C1, D2, 32 Lundy's Lane, Canadian Forces Base, Kingston, Ontario*, DCC Project No: KN109973 CCN#2, Inspect-Sol Engineering Solutions. November 11, 2011, provided by DCC (Inspect-Sol Report).
- Designated Substances and Hazardous Materials Survey, *Batoche Community Centre (HR26), Fort Henery Heights, Canadian Forces Base Kingston, Ontario*, DCC Project No. KN049991, Aquafor Beech Limited, May 20, 2005, provided by DCC (Aquafor Report).
- Designated Substances Survey, *Building R26, Fort Henery Heights, CFB Kingston, Kingston, Ontario*, DCC Project No. KN059914, Water & Earth Science Associates Ltd., December 1999, provided by DCC (WESA Report).

[1] Environmental Abatement Council of Canada. Mould Abatement Guidelines, 3rd Edition 2015.

[2] Canadian Construction Association. Mould guidelines for the Canadian construction industry, 2018.

6.1 RESULTS

6.1.1 Asbestos-Containing Materials

A total of thirty-nine (39) samples, representing nine (9) suspected ACMs, were collected and submitted for asbestos content analysis, including: window glazing, caulking, mechanical duct and pipe penetration seals, Transite panels, vinyl floor tiles, vinyl baseboard mastic, and exterior wall expansion joint seal.

Based on the current analytical and previously assessed results (DST Report, Inspect-Sol Report, Aquafor Report, and WESA Report), the following materials were determined to be an ACM:

- **Exterior soffit panels above classroom windows (Inspect-Sol Report), containing 50% chrysotile asbestos.**
- **Interior caulking on classroom windows of building old section (Aquafor report), containing 0.5% to 5% Chrysotile asbestos.**
- **Suspected pipe straight and pipe elbow insulation as well as debris in the ground floor washroom pipe chase that was not accessible at the time of the assessment (Aquafor report), containing 25-75% Chrysotile asbestos.**
- **Grey window glazing on interior stairwell windows (samples HR26-GLAZ-01A,01B,01C), containing 1% Chrysotile asbestos.**
- **12" x 12" beige vinyl floor tiles with grey streaks on gymnasium stage entrance (samples HR26-VFT-07A,07B,07C), containing 1% Chrysotile asbestos.**
- **Grey transite panels with holes, observed on the exterior south entrance awning (Samples HR26-TRANS-12A,12B,12C), containing 5% Amosite and 10% Chrysotile asbestos.**
- **Suspected asbestos-containing transite stormwater drainpipes observed in gymnasium rooms 122 and 127.**

Please refer to Attachment B: Spreadsheet of Findings (Table B.1) for further details regarding the suspected ACM samples collected for analysis. The laboratory analytical report is included within Attachment C: Laboratory Test Reports.

6.1.2 Metals-Containing Paint Samples

A total of eleven (11) suspected MCPs were identified within the Project Areas, which may be disturbed during the project work activities. Suspected MCPs were sampled and submitted for laboratory analysis to determine their content for Arsenic, Chromium, Lead, and Mercury.

Arsenic

None of the paints sampled by WSP during the PSDSHMA were found to contain arsenic above the laboratory's limit of detection of 50 µg/g.

Chromium

Chromium was found above the laboratory's detection limit of 50 µg/g in six (6) of the eleven (11) paints sampled by WSP during the PSDSHMA. For material disturbance or facility demolition, worker precautions will be required to meet occupational health and safety requirements as per the OHSA and COHSR.

Lead

Based on the analytical results, nine (9) of the eleven (11) sampled paints contained lead at concentrations above the limit of 90 µg/g specified in the Surface Coating Materials Regulations (SOR/2016-193), therefore, these paints applications are considered to be lead-containing.

Lead may also be present in solder on pipe joints, within cable wrapping, or in emergency light fixture batteries. Known or suspected lead-containing materials discovered during repair, renovation, construction, or demolition activities conducted within the Project Areas, and which may be impacted by project work activities, must be treated as lead-containing until tested and proven otherwise.

Mercury

Mercury was found above the laboratory's detection limits of 2 µg/g in four (4) of the eleven (11) paints sampled by WSP during the PSDSHMA, the levels were above the laboratory reporting detection limit of 2 micrograms per gram (µg/g) but below the federally regulated levels of 10 µg/g and are therefore not considered to be mercury-containing based on the applied Surface Coating Materials Regulations (SOR/2016-193).

Please refer to Attachment B: Spreadsheet of Findings (Table B.2) for further details regarding the suspected MCP samples collected for analysis. The laboratory analytical report is included within Attachment C: Laboratory Test Reports.

6.1.3 Polychlorinated Biphenyls

A total of eleven (11) suspected paint PCB-containing Materials (PCMs) were identified within the Project Areas, which may be disturbed during the project work activities. Suspected PCMs were sampled and submitted for laboratory analysis to determine their content for PCBs.

One of the suspected PCB-containing paint materials sampled during the PSDSHMA was found to contain PCBs above the laboratory reporting detection limit of 5 micrograms per gram (µg/g) but less than the federally regulated level of 50 µg/g (for solid materials) and therefore none of the suspected paints sampled are considered to be PCB-containing based on the Federal PCB Regulations SOR/2008-273.

All fluorescent light ballasts are suspected to contain PCBs and should be treated as PCB-containing unless confirmed otherwise. WSP did not observe any oil-containing equipment present within the building in the areas investigated. All other materials potentially containing PCBs were visually identified where present due the safety concerns associated with sampling live electrical equipment.

Any oil filled equipment encountered during decommissioning or light ballasts manufactured prior to 1980 shall be considered as PCB-containing unless determined otherwise. Typically, on removal of such units, if oil is present, they shall be sampled and analysed for PCBs and disposed of in accordance with regulations. At the time of demolition, all lamp ballasts shall be removed, and labels confirmed for the presence of PCBs, where possible.

Please refer to Attachment B: Spreadsheet of Findings (Table B.3) for further details regarding the suspected PCM samples collected for analysis. The laboratory analytical report is included within Attachment C: Laboratory Test Reports.

6.1.4 Silica-Containing Materials

Drywall, mortar, concrete and other masonry and aggregate products within the Project Areas are all assumed to be SCMs. SCMs were observed to be in good condition at the time of the PSDSHM assessment.

6.1.5 Mercury-Containing Materials

During the PSDSHM assessment, in addition to the sampled materials, fluorescent light tubes and bulbs were observed throughout the interior of the building and are presumed to contain mercury vapour. If fluorescent light tubes and bulbs are to be removed during project activities, they should remain unbroken and kept separate from all other waste to prevent damage prior to appropriate disposal. Elemental mercury may be present in switches and electrical switchgears within the Project Areas at the Site. At least 8 mercury-containing thermostats were observed within the defined Project Areas at the Site.

6.1.6 Other Designated Substances

No other designated substances, as defined in O. Reg. 490/09, were observed within the Project Areas.

6.1.7 Ozone-Depleting Substances

Four exterior rooftop air conditioning units with R-22 (HCFC-22) ODS refrigerant were observed during the assessment.

6.1.8 Visual Mould and Animal Waste/Remains

A visual assessment of the Project Areas was conducted to note evidence of visible mould and animal waste. No visible mould or rodent remains were observed within the subject building at the time of the assessment.

7.0 CONCLUSION AND RECOMMENDATIONS

7.1 Asbestos-Containing Materials

This report was prepared to fulfil the requirements of the COHSR, DAES Standard on Asbestos-Containing Material in Infrastructure, the Duty of the project owner's requirement under Section 30(1) of the OHSA, and the requirements of Section 10 of O. Reg. 278/05. This report must be provided to contractors prior to conducting demolition or renovation work at the Site. However, this report does not include the additional requirement for project specifications and drawings outlining abatement areas, quantities and specific procedures typically required in a demolition tender contract. This project-specific PSDSHM assessment report is intended to supplement project specifications only. Bidding contractors must refer to project specification package.

Based on the results of the PSDSHM assessment, the following recommendations are made with respect to ACMs known to be present within the Project Areas:

- ACMs must be removed in accordance with the COHSR, the DAES Standard on Asbestos-Containing Material in Infrastructure, and O. Reg. 278/05, prior to any disturbance caused by the re-development, renovation, or demolition processes. ACMs must be disposed of in accordance with COHSR, O. Reg. 278/05 and Ontario Regulation 347: *General - Waste Management* (O. Reg. 347). If ACMs that are in poor

condition are to remain in place at the Project Area, they must be repaired to good condition or otherwise removed.

The following table outlines the recommended removal procedures for the remediation of ACMs identified or presumed within the Project Areas at the Site to meet the requirements of the COHSR, DAES Standard on Asbestos-Containing Material in Infrastructure, and O. Reg. 278/05. Contractors must refer to relevant project specification tender documents and in the event of any conflicts, the specifications shall apply.

Table 1: Asbestos Remediation Recommendations for the Project Areas

Material Description / Location	Friable or Non-Friable	Asbestos Percentage and Type	Observed Estimated Quantity	Recommendations[1]
Exterior soffit panels above classroom windows.	Non-Friable	50% Chrysotile	65m^2	Disturbance or removal of this material, with the use of non-powered hand tools and if material is wetted to control the spread of dust or fibres, must be completed in accordance with **Type 1 / Low-risk** activity asbestos operations as prescribed by the DAES Standard on Asbestos-Containing Material in Infrastructure, O. Reg. 278/05 and COHSR, respectively, at a minimum, and project specifications.
Interior caulking on classroom windows of building old section.	Non-Friable	0.5-5% Chrysotile	940m	Disturbance or removal of this material, with the use of non-powered hand tools and if material is wetted to control the spread of dust or fibres, must be completed in accordance with **Type 1 / Low-risk** activity asbestos operations as prescribed by the DAES Standard on Asbestos-Containing Material in Infrastructure, O. Reg. 278/05 and COHSR, respectively, at a minimum, and project specifications.
Suspected pipe straight and pipe elbow insulation as well as debris in the ground floor washroom pipe chase.[2]	Friable	25-75% Chrysotile	6m^2	Disturbance or removal of this material must be completed in accordance with **Type 3 / High-risk** activity asbestos operations as prescribed by the DAES Standard on Asbestos-Containing Material in Infrastructure, O. Reg. 278/05 and COHSR, respectively, at a minimum, and project specifications.
Grey glazing on interior stairwell windows.	Non-Friable	1% Chrysotile	20m	Disturbance or removal of this material, with the use of non-powered hand tools and if material is wetted to control the spread of dust or fibres, must be completed in accordance with **Type 1 / Low-risk** activity asbestos operations as prescribed by the DAES Standard on Asbestos-Containing Material in Infrastructure, O. Reg. 278/05 and COHSR, respectively, at a minimum, and project specifications.
12” x 12” beige vinyl floor tiles with grey streaks on gymnasium stage entrance.	Non-Friable	1% Chrysotile	2m^2	Disturbance or removal of this material, with the use of non-powered hand tools and if material is wetted to control the spread of dust or fibres, must be completed in accordance with **Type 1 / Low-risk** activity asbestos operations as prescribed by the DAES Standard on Asbestos-Containing Material in Infrastructure, O. Reg. 278/05 and COHSR, respectively, at a minimum, and project specifications.

Table 1: Asbestos Remediation Recommendations for the Project Areas

Material Description / Location	Friable or Non-Friable	Asbestos Percentage and Type	Observed Estimated Quantity	Recommendations[1]
Grey Transite panels with holes, observed on the exterior south entrance awning.	Non-Friable	5% Amosite and 10% Chrysotile	10m^2	Disturbance or removal of this material, with the use of non-powered hand tools and if material is wetted to control the spread of dust or fibres, must be completed in accordance with **Type 1 / Low-risk** activity asbestos operations as prescribed by the DAES Standard on Asbestos-Containing Material in Infrastructure, O. Reg. 278/05 and COHSR, respectively, at a minimum, and project specifications.
Suspected asbestos-containing Transite stormwater drainpipes observed in in gymnasium rooms 122 and 127	Non-Friable	N/A	<1m^2	Disturbance or removal of this material, with the use of non-powered hand tools and if material is wetted to control the spread of dust or fibres, must be completed in accordance with **Type 1 / Low-risk** activity asbestos operations as prescribed by the DAES Standard on Asbestos-Containing Material in Infrastructure, O. Reg. 278/05 and COHSR, respectively, at a minimum, and project specifications.

1. Abatement levels are based on type of material, quantity of material and method of disturbance. Recommendations are subject to change depending on project-specific extents or constraints.
2. The assumption of pipe straight and pipe elbow insulation as well as debris in the ground floor washroom pipe chase is based on paragraph 4 of the Executive Summary of the Aquafor Report, identifying pipe elbows and debris that don't appear to have been abated to date.

Although efforts were made to expose and sample all potential ACMs, there is a possibility that additional ACMs may be present in concealed and inaccessible spaces that may not have been observed or accessible during this assessment. If additional and suspected ACMs that were not previously identified are encountered during project activities, work must be stopped, and further investigation must be conducted at that time. In the case suspected ACMs that cannot be tested, they must be treated as ACMs in accordance with the DAES Standard on Asbestos-Containing Material in Infrastructure, O. Reg. 278/05 and the COHSR until proven otherwise by laboratory analysis.

7.2 Lead-Containing Materials

Based on the findings of the PSDSHM assessment, lead-containing paints/materials were identified. The following table outlines the recommended removal procedures for the remediation of lead containing materials identified or presumed within the Project Areas at the Site to meet the requirements of the Surface Coatings Materials Regulation (SOR/2016-193). Contractors must refer to relevant project specification tender documents and in the event of any conflicts, the specifications shall apply.

Table 2: Lead Remediation Recommendations for the Project Areas

Paint Description / Location	Lead Concentration (ug/g)	Observed Estimated Quantity.	Recommendations[1]
Grey Floor Paint in Mechanical Room	553	100m^2	Disturbance or removal of this material, with the use of non-powered tools or powered tools that are attached to dust-collecting devices equipped with HEPA filters, must be completed, at minimum, in accordance with **Type 1 (Minimum Precautions) for Lead and Other Paint Coatings** as prescribed by the Ontario Ministry of Labour publication Guideline – Lead On Construction Projects (Issued September 2004, Updated April 2011), at a minimum, and project specifications.
White Wall Paint in Mechanical Room	295	50m^2	Disturbance or removal of this material, with the use of non-powered tools or powered tools that are attached to dust-collecting devices equipped with HEPA filters, must be completed, at minimum, in accordance with **Type 1 (Minimum Precautions) for Lead and Other Paint Coatings** as prescribed by the Ontario Ministry of Labour publication Guideline – Lead On Construction Projects (Issued September 2004, Updated April 2011), at a minimum, and project specifications.
Black Paint on Chimney Doors in Mechanical Room	2,060	1m^2	Disturbance or removal of this material, with the use of non-powered tools or powered tools that are attached to dust-collecting devices equipped with HEPA filters, must be completed, at minimum, in accordance with **Type 1 (Minimum Precautions) for Lead and Other Paint Coatings** as prescribed by the Ontario Ministry of Labour publication Guideline – Lead On Construction Projects (Issued September 2004, Updated April 2011), at a minimum, and project specifications.
Beige Duct Paint in Mechanical Room	2,010	100m^2	Disturbance or removal of this material, with the use of non-powered tools or powered tools that are attached to dust-collecting devices equipped with HEPA filters, must be completed, at minimum, in accordance with **Type 1 (Minimum Precautions) for Lead and Other Paint Coatings** as prescribed by the Ontario Ministry of Labour publication Guideline – Lead On Construction Projects (Issued September 2004, Updated April 2011), at a minimum, and project specifications.
Yellow Corridor and Stairwell Wall Paint	545	1,000m^2	Disturbance or removal of this material, with the use of non-powered tools or powered tools that are attached to dust-collecting devices equipped with HEPA filters, must be completed, at minimum, in accordance with **Type 1 (Minimum Precautions) for Lead and Other Paint Coatings** as prescribed by the Ontario Ministry of Labour publication Guideline – Lead On Construction Projects (Issued September 2004, Updated April 2011), at a minimum, and project specifications.

Table 2: Lead Remediation Recommendations for the Project Areas

Paint Description / Location	Lead Concentration (ug/g)	Observed Estimated Quantity.	Recommendations[1]
Brown Exterior Door Paint	9,490	3m^2	Disturbance or removal of this material, with the use of non-powered tools or powered tools that are attached to dust-collecting devices equipped with HEPA filters, must be completed, at minimum, in accordance with **Type 1 (Minimum Precautions) for Lead and Other Paint Coatings** as prescribed by the Ontario Ministry of Labour publication Guideline – Lead On Construction Projects (Issued September 2004, Updated April 2011), at a minimum, and project specifications.
Blue Duct Paint in Room 307	1,030	28m^2	Disturbance or removal of this material, with the use of non-powered tools or powered tools that are attached to dust-collecting devices equipped with HEPA filters, must be completed, at minimum, in accordance with **Type 1 (Minimum Precautions) for Lead and Other Paint Coatings** as prescribed by the Ontario Ministry of Labour publication Guideline – Lead On Construction Projects (Issued September 2004, Updated April 2011), at a minimum, and project specifications.
Brown Paint on Exterior South Entrance Awning	240	15m^2	Disturbance or removal of this material, with the use of non-powered tools or powered tools that are attached to dust-collecting devices equipped with HEPA filters, must be completed, at minimum, in accordance with **Type 1 (Minimum Precautions) for Lead and Other Paint Coatings** as prescribed by the Ontario Ministry of Labour publication Guideline – Lead On Construction Projects (Issued September 2004, Updated April 2011), at a minimum, and project specifications.
Beige Paint on Exterior Transite Panels	1,600	65m^2	Disturbance or removal of this material, with the use of non-powered tools or powered tools that are attached to dust-collecting devices equipped with HEPA filters, must be completed, at minimum, in accordance with **Type 1 (Minimum Precautions) for Lead and Other Paint Coatings** as prescribed by the Ontario Ministry of Labour publication Guideline – Lead On Construction Projects (Issued September 2004, Updated April 2011), at a minimum, and project specifications.

1. Abatement levels are based on method of disturbance. Recommendations are subject to change depending on project-specific extents or constraints.

- Disturbance of LCMs during renovation/demolition operations must be conducted in accordance with the CLC-II, OHSA and the Ontario Ministry of Labour, Immigration, Training and Skills Development (MLITSD) Lead Guideline[3].
- If LCMs are to be removed, they must be sent to a Ministry of the Environment Conservation and Parks (MECP) licensed recycling or disposal facility. The demolition contractor should be responsible to recover this material and prevent it from going to a landfill. If recycling of the lead is not completed, then it must be disposed of in an approved landfill.
- If LCMs are to be disposed of in a landfill, waste characterization is to be performed including analysis of both the LCM and the underlying substrate for lead leachate, using the Toxicity Characteristic Leaching Procedure (TCLP) as specified in O. Reg. 347/90. Based on the results of the TCLP analysis, removed LCMs would either be considered as construction waste or leachate toxic waste. All leachate toxic materials would require segregation and final disposal in a landfill licensed to accept leachate toxic waste by the MECP.

If additional suspected LCMs are identified during renovation and/or demolition activities (e.g., solder, cable wrapping, or brick ties), they must be treated as LCMs until tested and proven otherwise.

7.3 Lead Leachate Sampling

In order to complete waste characterization, as specified in Ontario Regulation 347/90: General Waste Management, as amended, made under the Ontario Environmental Protection Act (EPA), R.S.O., 1990, Chapter E.19., samples of materials with LCP found in poor condition during the assessment were analyzed for lead leachate concentrations by TCLP. Laboratory analyses indicated that the leachate concentration of lead for the sampled materials (samples HR26-Pb-01, HR26-Pb-02, HR26-Pb-08, HR26-Pb-10, HR26-Pb-11) was above the Reporting Detection Limit (RDL) but below the maximum allowable concentration of 5 mg/L, as prescribed by Schedule 4, O. Reg. 347/90, as amended.

Photos and analytical laboratory results for the lead analysis are summarized within Attachment B: Spreadsheet of Findings (Table B.4), and the laboratory analytical report is included in Attachment C. Refer Attachment D: Figures for the approximate paint sample locations.

7.4 Silica-Containing Materials

If disturbance of Silica-Containing Materials (SCMs) such as drywall, concrete, mortar, or other masonry products is required, disturbance must be conducted in accordance with the OHSA and the MLITSD Silica Guideline[4]. The MLITSD Silica Guideline provides recommended safe measures and procedures addressing construction-related work involving disturbance of materials that may generate an exposure risk. If these measures and procedures are followed, worker exposure is not expected to be greater than occupational exposure limits for silica.

[3] Ministry of Labour, Immigration, Training and Skills Development of Ontario (Updated November 2022): Lead on Construction Projects

[4] Ministry of Labour, Immigration, Training and Skills Development of Ontario (Updated April 2011): Silica on Construction Projects.

7.5 Mercury-Containing Materials

The fluorescent light tubes observed throughout the Site are presumed to contain mercury vapour. The exposure risk to mercury vapour is mitigated if the tubes remain unbroken. Additionally, approximately eight (8) mercury-containing thermostats were observed within the subject building at the time of the assessment. If fluorescent light tubes and bulbs or mercury containing thermostats are to be removed during renovation, demolition, or construction activities, they should remain unbroken and kept separate from all other waste to prevent damage prior to proper disposal. Disposal of mercury-containing materials (MCM) shall be performed in accordance with O. Reg. 347/90, as amended. Please refer to Attachment B: Spreadsheet of Findings (Table B.5) for further details regarding Mercury-Containing Materials.

Please refer to Attachment B: Spreadsheet of Findings (Table B.2) for further details regarding the suspected MCM samples collected for analysis. The laboratory analytical report is included within Attachment C: Laboratory Test Reports.

7.6 Polychlorinated Biphenyls

Based on the results of the PSDSHM assessment, the following recommendations are made with respect to PCBs identified within the Project Areas:

One of the paint samples analyzed for PCBs contained levels above the laboratory detection limit of 5 µg/g but not above the regulated level of 50 µg/g (R.R.O. 1990, Reg. 347: General – Waste Management) and therefore is not considered PCB-containing.

Please refer to Attachment B: Spreadsheet of Findings (Table B.3) for further details regarding the suspected PCB-containing samples collected for analysis. The laboratory analytical report is included within Attachment C: Laboratory Test Reports.

The fluorescent light fixtures observed throughout the Project Areas are suspected to contain ballast with PCBs. Ballasts were not evaluated due to safety concerns regarding energized equipment.

If fluorescent light ballasts must be disturbed, WSP recommends that ballasts information be collected by the contractor when the systems are de-energized to determine if PCBs may be present prior to demolition. The exposure risk to PCBs is mitigated if the ballast remains unbroken. Disposal of materials containing PCBs shall be performed in accordance with O. Reg. 347/90.

7.7 Ozone-Depleting Substances

Potential ODS-containing air conditioners can be managed in place. Prior to future project activities that may disturb the air conditioner units, ODS refrigerant must be confirmed and subsequently removed and drained by a licensed technician before the equipment is decommissioned. Up-to-date records should be kept detailing the transfer quantities by refrigerant types and given to the owner for their records.

7.8 Visual Mould and Animal Waste/Remains

Visible mould was no observed, however visible rodent remains were observed within the basement of the building during the PSDSHM assessment. Should water-damaged and/or mould-impacted building materials or evidence of animal waste/remains be encountered during project activities, further assessment should be

conducted at that time. Any remediation or removal of water-damaged and mould-impacted building materials or animal waste/remains should be conducted in accordance the EACC Mould Guidelines and the CCA Mould Guidelines described within Attachment A.

8.0 STATEMENT OF LIMITATIONS

This report is based on samples and information provided by previously prepared designated substances reports provided by DCC, as well as information collected during the Site visits conducted by WSP on February 25th, 2025, and March 18th, 2025, and is based solely on-site conditions encountered at the time of the sampling, as described in this report.

The conclusions and recommendations contained in this report are based upon professional opinions with regard to the subject matter. These opinions are in accordance with currently accepted environmental assessment standards and practices applicable to these locations and are subject to the following inherent limitations.

The data and findings presented in this report are valid as of the date of the investigation. The passage of time, manifestation of latent conditions or occurrence of future events may warrant further exploration at the properties, analysis of the data, and re-evaluation of the findings, observations, and conclusions expressed in this report.

The findings, observations and conclusions expressed by WSP in this report are not, and should not be considered, an opinion concerning compliance of any past or present owner or operator of the building with any federal, provincial, or local laws or regulations.

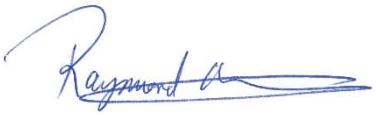
As such, if additional and suspected designated substances are encountered during renovation and/or demolition activities that are not included in this report, it is recommended that a further investigation be conducted at that time. As such, in the case that suspected ACMs, PCBs or MCMs cannot be tested, they must be treated as such until proven otherwise. Should building materials encountered during any renovation and/or demolition activities be found to contain asbestos, these materials must be managed in accordance with the DAES Standard on Asbestos- Containing Material in Infrastructure, the COHSR and O. Reg. 278/05.

9.0 CLOSURE

Should you have any questions pertaining to this project, please contact the undersigned. Thank you for retaining the services of WSP on this project.

Signature Page

WSP Canada Inc.



Raymond Ockrant, Dipl. Env Tech
Senior Environmental Technician



Stephen Heikkila, P. Eng., PMP
Team Lead - EHS Eastern Ontario, Earth & Environment

RO/SH/

APPENDIX A

Regulations and Guidelines

REGULATIONS AND GUIDELINES

Canada Occupational Health and Safety Regulations, SOR/86-304 (COHSR), Part X – Hazardous Substances

The Site is federally regulated, and therefore worker exposure to chemical agents is regulated under the *Canada Occupational Health and Safety Regulations*, SOR/86-304 (COHSR) made under the *Canada Labour Code Part II* (CLC-II). In addition, the general duty clause of CLC-II requires employers to ensure that the health and safety of their employees is protected.

COHSR *Part X – Hazardous Substances*, lists prescribed requirements for the control of hazardous substances in federally regulated workplaces. Specifically, Section 124 of the CLC-II requires the employer to ensure that the health and safety at work of every person employed by the employer is protected. Furthermore, Section 10.19(1) of the CLC-II requires the employer to ensure that worker exposure to chemical agents do not exceed the recommended limits of the American Conference of Governmental Industrial Hygienists (ACGIH) publication entitled *Threshold Limit Values (TLVs) and Biological Exposure Indices*, dated 1994-1995, as amended from time to time.

Designated Substances

Although designated substances are not defined under federal regulations, they have been included here to meet the project requirements. The project scope of work entailed a review of designated substances.

The Ontario *Occupational Health and Safety Act*, Revised Statutes of Ontario (R.S.O.) 1990, Chapter 0.1 (OHSA) defines designated substances and outlines the basic duties of project owners regarding designated substances on project sites. According to the “Duty of project owners” requirement under Section 30 (1) of the OHSA, prior to beginning a construction project (including renovation or demolition) a document summarizing the presence of these designated substances must be available to contractors and subcontractors as part of the tendering of information. In addition, the Ontario Regulation 490/09: *Designated Substances* (O. Reg. 490/09), as amended and made under OHSA, prescribes occupational exposure limits and any required assessment and control programs for designated substances which exist within a building, project site or workplace.

Asbestos

The Canada Labour Code was amended in 2017, which resulted in occupational health and safety regulation changes regarding asbestos. The amended regulation defines an asbestos-containing material (ACM) to be any material containing 1% or more asbestos by weight.

Under Section 10.26.1 of the COHSR, if ACM is present in a workplace and there is the potential for a release of asbestos fibres or employee exposure to asbestos fibres, the employer shall ensure that a qualified person carry out a hazard investigation, including identifying and documentation of the type, condition, friability, accessibility, likelihood of damage and potential release of fibres. WSP’s assessment was performed to serve this purpose.

Furthermore, if asbestos is identified during the hazard investigation, an Asbestos Control Plan must be in place prior to undertaking work involving ACM to ensure ACM is classified (as high-, moderate- or low-risk activity), ACM has been identified, and that procedures and controls are in place to prevent exposure; including asbestos dust, waste, and debris removal, decontamination, and air sampling requirements.

The DAES Standard on Asbestos-Containing Material in Infrastructure prescribes the operational and technical requirements for the management, maintenance, and repair work processes of ACM and the COHSR.

In addition, Section 10 of Ontario Regulation 278/05: *Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations* (O. Reg. 278/05), as amended and made under the OHSA, outlines specific procedures for the identification of ACMs in buildings and on construction sites and protocols for their removal or disturbance during renovation. O. Reg. 278/05 defines as an ACM as a material that contains 0.5 per cent or more asbestos by dry weight. For the purposes of WSP's assessment, the O. Reg. 278/05 definition of asbestos was applied as WSP's mandate was to review Designated Substances at the Site which are relevant to Ontario.

Under Section 30 of the OHSA, before beginning a project, the owner shall determine whether any designated substances are present at each project site and shall prepare a list of all designated substances that are present at each site.

Ontario Regulation 347 *General – Waste Management* as amended (O. Reg. 347/90), made under the Ontario *Environmental Protection Act*, R.S.O. 1990, Chapter E.19, as amended, sets out requirements for general waste management including ACM. The regulation defines "asbestos waste" as "solid or liquid waste that results from the removal of asbestos-containing construction or insulation materials or from the manufacture of asbestos-containing products and contains asbestos in more than a trivial amount or proportion". This regulation requires the disposal of asbestos waste in a double sealed container, properly labelled and free of cuts, tears or punctures. The waste must be disposed of in a licensed waste facility which has been properly notified of the presence of asbestos waste.

Lead

Under the COHSR, the employee shall be kept free from exposure to a concentration of an airborne lead in excess of the ACGIH Threshold Limit Value – Time-Weighted Average (TLV-TWA) of 0.05 mg/m^3 for lead. Although there is no federal regulation concerning lead in paint at the workplace, section 126(1) of the CLC-II states that every employee shall, take all reasonable and necessary precautions to ensure the health and safety of the employee, the other employees and any person likely to be affected by the employee's acts or omissions. Therefore, WSP has consulted various other guidance for interpretation of lead in paint or other materials.

In 2005, the Government of Canada passed the *Surface Coating Materials Regulations*, under the *Hazardous Products Act*. The regulations were amended in 2010 setting the limit for lead content of surface coating materials at 90 mg/kg (equivalent to 90 µg/g or 90 ppm). The limit of 90 mg/kg is specifically for consumer products; however, it is a widely accepted limit for lead content in paint in federally regulated workplaces.

The Occupational Health and Safety Branch of the Ministry of Labour, Immigration, Training and Skills Development of Ontario (MLITSD) published their Guideline entitled *Lead on Construction Projects*, revised in April 2011 (MLITSD Lead Guideline), to raise the awareness of employers and workers in the construction industry of the hazards posed by lead in construction and the measures and procedures that should be taken to control those hazards. Currently, this document represents due diligence practice for lead exposure control on construction projects, as enforced by the MLITSD under the General Duty clause 25(2)(h) of the OHSA. As such, it is referenced within the report, where appropriate, to provide guidance on appropriate handling and exposure control procedures when dealing with lead.

WSP understands the MLITSD currently does not include criteria for classification of LCP, and as such, WSP has applied the Government of Canada's *Surface Coating Materials Regulations* (SOR/2016-193), made under the *Canada Consumer Product Safety Act*, of 90 ppm (equivalent to 90 µg/g). This limit is specifically for consumer products; however, it has been historically used as an industry accepted limit for lead content in materials such as paints, therefore it has been applied herein to define the LCP threshold.

Disposal of lead must be done in accordance with applicable local regulations, if any. In the absence of applicable local regulations, disposal of lead should be in accordance with the requirements of O. Reg. 347/90.

Mercury

WSP's review of mercury was included a visual assessment of potential mercury-containing equipment and noted damage, where observed. Intact mercury-containing equipment do not create an airborne concentration or exposure risk and thus meet the requirements of the CLC-II. Disposal of mercury must be done in accordance with applicable local regulations, if any. In the absence of applicable local regulations, disposal of mercury should be in accordance with the requirements of O. Reg. 347/90.

Silica

The federally regulated TLV-TWA for crystalline silica made under the CLC-II is 0.025 mg/m^3. However, silica-containing materials in good condition and not anticipated to be disturbed will not create an exposure risk. Therefore, WSP's review of silica was limited to a visual assessment and noted damage, where observed.

The Occupational Health and Safety Branch of the MLITSD published their Guideline entitled *Silica on Construction Projects*, revised in 2011 ("MLITSD Silica Guideline"), to raise the awareness of employers and workers in the construction industry of the hazards posed by silica in construction and the measures and procedures that should be taken to control those hazards. The MLITSD Silica Guideline should be consulted for the removal or disturbance of silica in absence of Canadian regulations governing the removal or disturbance of silica. Currently, this document represents due diligence practice for silica exposure control on construction projects, as enforced by the MLITSD under the General Duty clause 25(2)(h) of the OHSA. As such, it is referenced within the report, where appropriate, to provide guidance on appropriate handling and exposure control procedures when dealing with silica.

Other Designated Substances

In addition to the four designated substances that have a high probability of being present at the Site, which are discussed in detail in the previous sections, the following seven designated substances as defined in the regulations under the OHSA were included in this survey: acrylonitrile, arsenic, benzene, coke oven emissions, ethylene oxide, isocyanates and vinyl chloride. Based on WSP's professional experience, none of these substances were expected to be present and, as such, no specific observations or sampling of materials potentially containing these substances were undertaken.

Ozone-Depleting Substances (ODS)

An ozone-depleting substance (ODS) refers to any substance containing chlorofluorocarbon (CFC), hydrochlorofluorocarbon (HCFC), halon or any other material capable of destroying ozone in the atmosphere. ODSs have been used in rigid polyurethane foam and insulation, laminates, aerosols, air conditioners, fire extinguishers, cleaning solvents and the sterilization of medical equipment. Federal regulations introduced in 1995 required the elimination of production and import of CFCs by January 1, 1996 (subject to certain essential uses) and a freeze on the production and import of HCFCs by January 1, 1996, unless by permit.
These regulations also require the phase-out of CFCs at the time of major overhauls of a cooling system after January 1, 2005. Some Provinces have also enacted legislation that places use prohibitions on certain listed ozone depleting substances.

As the regulations govern only the production and import of certain ODSs, they are allowed to be used in Canada, as long as there is a supply in place. Eventually the supply will run out, and the present equipment will either need to be refitted or replaced. It is understood from several air conditioning companies, that there is a sufficient supply of CFCs and HCFC-22 in Canada for at least the next several years. The federal Hazardous Products Act (HPA) does not require the licensing, approval or registration of a property in which ODSs have been identified. However, provincial regulations require the licensing of contractors who handle ODSs through equipment servicing.

Polychlorinated Biphenyls (PCBs)

R.R.O. 1990, Regulation 362 *Waste Management – PCB'S* as amended (Reg. 362), made under the Ontario *Environmental Protection Act*, R.S.O. 1990, Chapter E.19, as amended sets out requirements for PCB waste management.

Additionally, section 3(1) of R.R.O. 1990, Regulation 833 – *Control of Exposure to Biological or Chemical Agents*, requires the employer to take all measures reasonably necessary in the circumstances to protect workers from exposure to hazardous biological or chemical agents due to the storage, handling, processing or use of such agents in the workplace. Appropriate dermal protection is crucial to worker protection when handling ballasts and transformer fluids.

PCBs are regulated under the CEPA 1999, PCB Regulation (SOR/2008-273) which came into force September 2008 and subsequent amendment regulation SOR/2010-57. PCBs are listed as a CEPA toxic substance. The Federal PCB regulations generally establish deadlines for ending the use and long-term storage of PCBs and products containing PCBs. PCB-containing equipment or any PCB-containing substance with a PCB concentration at or in excess of 2 parts per million (ppm) for liquids and 50 ppm for solids are subject to the above Federal regulations.

Other Hazardous Material – Visible Mould and Animal Waste

There are no specific regulations addressing animal waste contamination. However, the OSHA general duty clause applies to ensure that employers protect the health and safety of their workers. As such, animal waste such as feces or evidence of birds, bats, vermin, insects, or pests were documented, where observed in this assessment.

As indicated in the Health Canada Residential Indoor Air Quality Guidelines, mould growth in buildings may pose a health hazard. The Health Canada Residential Indoor Air Quality Guidelines recommend the control of humidity, diligent repair of any water damage, and thorough cleaning of any visible or concealed mould growth[1].

It is recommended that any building materials supporting fungal growth be remediated as rapidly as possible in order to promote a healthy environment. Water damaged building materials susceptible to mould growth should be dried immediately, or pre-emptively abated to avoid mould growth and amplification. Repair of the defects that led to water accumulation should be conducted in conjunction with, or prior to, the remediation.

There are no specific provincial regulations addressing mould contamination. However, according to Health Canada[2], the American Industrial Hygiene Association's *Guide for the Determination of Biological Contaminants in Environmental Samples 2nd Edition*, the Environmental Abatement Council of Canada's *Mould Abatement Guidelines* (EACC Mould Guidelines)[3] and the Canadian Construction Association's *Mould Guidelines for the*

[1] Health Canada. Residential Indoor Air Quality Guideline – Moulds. March 31, 2007.

[2] *Fungal Contamination in Public Branches: A Guide to Recognition and Management*, Health Canada, Federal-Provincial Committee on Environmental and Occupational Health, June 1995.

[3] Environmental Abatement Council of Canada. *Mould Abatement Guidelines*, 3rd Edition, 2015.

Canadian Construction Industry (CCA Mould Guidelines)[4], building materials supporting mould growth should be remediated as rapidly as possible in order to ensure a healthy environment.

[4] Canadian Construction Association. *Mould guidelines for the Canadian construction industry*, 2018.

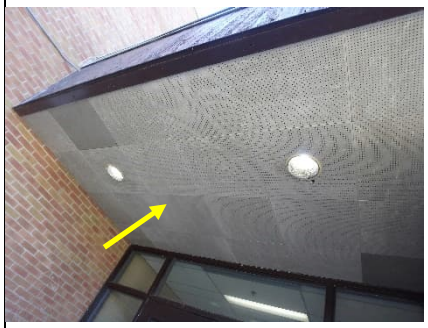
APPENDIX B

Spreadsheet of Findings

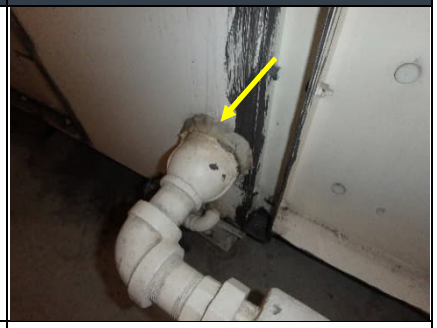
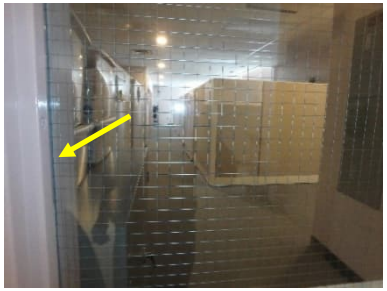
Table B.1: Summary of Materials Assessed and Recently Sampled for Asbestos Analysis

Material Description (1)	Material Location	Observed Estimated Quantity	Condition	Friable (Yes / No)	Accessibility (2)	Action (4)	Sample Number	Asbestos Concentration and Type	Photograph
Exterior Soffit Panels	Observed on the exterior of the building above classroom windows.	65m^2	Good	No	C(Exposed)	7	Inspect-Sol Report	50% Chrysotile	
Interior Caulking	Observed on interior classroom windows of building old section.	940m	Good	No	A	7	Aquafor report	0.5-5% Chrysotile	

Material Description (1)	Material Location	Observed Estimated Quantity	Condition	Friable (Yes / No)	Accessibility (2)	Action (4)	Sample Number	Asbestos Concentration and Type	Photograph
Suspected Pipe Straight, Pipe Elbow Insulation and Debris	**Observed** in the ground floor washroom pipe chase that was not accessible at the time of the assessment.	**6m²**	**Poor**	**Yes**	**C (Concealed)**	**2**	**Aquafor report**	**25-75% Chrysotile**	
Grey Window Glazing	**Observed on interior stairwell windows.**	**20m**	**Good**	**No**	**A**	**7**	**HR26-GLAZ-01A,01B,01C**	**1% Chrysotile**	

Material Description (1)	Material Location	Observed Estimated Quantity	Condition	Friable (Yes / No)	Accessibility (2)	Action (4)	Sample Number	Asbestos Concentration and Type	Photograph
12" X 12" Beige Vinyl Floor Tiles with Grey Streaks	Observed on gymnasium stage entrance.	2m^2	Good	No	A	7	HR26-VFT-07A,07B,07C	1% Chrysotile	
Grey Transite Panels with Holes	Observed on the exterior south entrance awning.	10m^2	Good	No	C (Exposed)	7	HR26-TRANS-12A,12B,12C	5% Amosite and 10% Chrysotile	

Material Description (1)	Material Location	Observed Estimated Quantity	Condition	Friable (Yes / No)	Accessibility (2)	Action (4)	Sample Number	Asbestos Concentration and Type	Photograph
Suspected Asbestos-Containing Transite Stormwater Drainpipes	**Observed in gymnasium rooms 122 and 127.**	**<1m²**	**Good**	**Yes**	**A**	**7**	**N/A**	**N/A**	
Grey Duct Seal	Observed on mechanical ducts throughout building.	N/A	N/A	N/A	N/A	N/A	HR26-SEAL-02A,02B,02C	None Detected	

Material Description (1)	Material Location	Observed Estimated Quantity	Condition	Friable (Yes / No)	Accessibility (2)	Action (4)	Sample Number	Asbestos Concentration and Type	Photograph
Beige Pipe Penetration Seal	Observed on HVAC unit in room 306.	N/A	N/A	N/A	N/A	N/A	HR26-PPS-03A,03B,03C	None Detected	
Black Interior Window Glazing	Observed on corridor and office windows.	N/A	N/A	N/A	N/A	N/A	HR26-GLAZ-04A,04B,04C	None Detected	
Beige 12"x12" vinyl floor tile with grey streaks	Observed in daycare room washrooms.	N/A	N/A	N/A	N/A	N/A	HR26-VFT-05A,05B,05C	None Detected	

Material Description (1)	Material Location	Observed Estimated Quantity	Condition	Friable (Yes / No)	Accessibility (2)	Action (4)	Sample Number	Asbestos Concentration and Type	Photograph
Beige mastic adhesive	Observed on grey vinyl baseboards throughout the building.	N/A	N/A	N/A	N/A	N/A	HR26-MAS-06A,06B,06C	None Detected	
Grey Expansion Joint Seal	Observed on exterior brick of gymnasium.	N/A	N/A	N/A	N/A	N/A	HR26-EXP-08A,08B,08C	None Detected	
Grey Caulking	Observed on exterior of window ledges.	N/A	N/A	N/A	N/A	N/A	HR26-CLK-09A,09B,09C	None Detected	

Material Description (1)	Material Location	Observed Estimated Quantity	Condition	Friable (Yes / No)	Accessibility (2)	Action (4)	Sample Number	Asbestos Concentration and Type	Photograph
Black Glazing	Observed on exterior of windows and vents.	N/A (3)	N/A	N/A	N/A	N/A	HR26-GLAZ-10A,10B,10C	None Detected	 
Dark Grey Caulking	Observed on exterior of window frames.	N/A	N/A	N/A	N/A	N/A	HR26-CLK-11A,11B,11C	None Detected	

Material Description (1)	Material Location	Observed Estimated Quantity	Condition	Friable (Yes / No)	Accessibility (2)	Action (4)	Sample Number	Asbestos Concentration and Type	Photograph
Beige Putty Seal	Observed on exterior of window frames.	N/A	N/A	N/A	N/A	N/A	HR26-PUTTY-13A,13B,13C	None Detected	
2'x4' lay in ceiling tile, fissures and dots	Observed on ceilings throughout the building.	N/A	N/A	N/A	N/A	N/A	DST Report	None Detected	

Material Description (1)	Material Location	Observed Estimated Quantity	Condition	Friable (Yes / No)	Accessibility (2)	Action (4)	Sample Number	Asbestos Concentration and Type	Photograph
2'x4' lay in ceiling tile, random dots	Observed on ceilings throughout the building.	N/A	N/A	N/A	N/A	N/A	DST Report	None Detected	

Notes:

(1) All materials found to be in likeness to confirmed asbestos-containing materials (ACMs) should be assumed to be ACMs unless otherwise confirmed by laboratory analysis.

(2) The accessibility of known ACMs is rated in accordance with the following criteria:
Access (A): Areas of the building within reach (from floor level) of all building users. Includes areas such as gymnasiums, workshops, and storage areas where activities of the building users (for example basketball on gym ceiling) may result in disturbance of ACM not normally within reach from floor level.
Access (B): Frequently entered maintenance areas within reach of maintenance staff, without the need for a ladder. Includes: frequently entered pipe chases, tunnels and service areas or areas within reach from a fixed ladder or catwalk, for example tops of equipment, mezzanines.
Access (C) Exposed: Areas of the building above 8'0" where use of a ladder is required to reach the ACM. Only refers to ACMs that are exposed to view, from the floor or ladder, without removing or opening other building components such as ceiling tiles, or service access doors or hatches. Does not include infrequently accessed service areas of the building.
Access (C) Concealed: Areas of the building which require the removal of a building component, including lay-in ceilings and access panels into solid ceiling systems. Includes rarely entered crawl spaces, attic spaces, etc. Observations are limited to the extent visible from the access points.
Access (D) Concealed: Areas of the building behind inaccessible solid ceiling systems, walls, or mechanical equipment, etc., where demolition of the ceiling, wall or equipment, etc., is required to reach the ACM. Evaluation of condition and extent of ACM is limited or impossible, depending on the assessor's ability to visually examine the materials in areas rated Access (D).

(3) "N/A" indicates not applicable. Sampled material contains less than 1% and less than 0.5% asbestos by weight and is therefore not considered to be an ACM in accordance with the COHSR and O. Reg. 278/05, respectively.

(4) **ACTION**

ACTION MATRIX – ASBESTOS-CONTAINING MATERIAL				
ACCESS	CONDITION			DEBRIS
	GOOD	FAIR	POOR	
(A)	**ACTION 5/7[1]**	**ACTION 5/6[2]**	**ACTION 3**	**ACTION 1**
(B)	**ACTION 7**	**ACTION 6/5[3]**	**ACTION 3**	**ACTION 1**
(C) Exposed	**ACTION 7**	**ACTION 6**	**ACTION 4**	**ACTION 2**
(C) Concealed	**ACTION 7**	**ACTION 7**	**ACTION 4**	**ACTION 2**
(D)	**ACTION 7**	**ACTION 7**	**ACTION 7**	**ACTION 7**

[1] If material is in ACCESS (A)/GOOD condition is not removed, ACTION 7 is required.
[2] If material is in ACCESS (A)/FAIR condition is not removed, ACTION 6 is required.
[3] Remove ACM in ACCESS (B)/FAIR condition if ACM is likely to be disturbed.

ACTION 1: Immediate clean-up of debris that is likely to be disturbed. Access that is likely to cause a disturbance of the ASBESTOS-CONTAINING MATERIAL DEBRIS is to be restricted and clean up ASBESTOS-CONTAINING MATERIAL DEBRIS is to be done immediately. Use correct asbestos procedures. This action is required for compliance with regulatory requirements and good practice. The assessor should immediately notify the Asset or Property and Facility Manager, or Regional Area Asbestos Management Coordinator of this condition.

ACTION 2: Entry into areas with asbestos-containing material debris requires intermediate risk precautions. At locations where ASBESTOS-CONTAINING MATERIAL DEBRIS can be isolated in lieu of removal or cleaned up, appropriate means to limit entry to the area is to be used. Access to the area is restricted to persons using intermediate risk asbestos-work precautions. The precautions will be required until the ASBESTOS-CONTAINING MATERIAL DEBRIS has been cleaned up, and the source of the DEBRIS has been stabilized or removed following intermediate risk (if minor) or high-risk precautions.

ACTION 3: Asbestos-containing material removal required for compliance. Asbestos-containing material must be removed for compliance with regulatory requirements and good practice. Use asbestos procedures appropriate to the scope of the removal work.

ACTION 4: Access into areas where asbestos-containing material is present and likely to be disturbed by access requires intermediate risk precautions. Intermediate risk asbestos precautions are to be used when entry or access into an area is likely to disturb the asbestos-containing material. ACTION 4 must be used until the asbestos-containing material is removed (Use ACTION 1 or 2 if DEBRIS is present). Intermediate risk or high-risk precautions should be used for removal (depending on extent of removal).

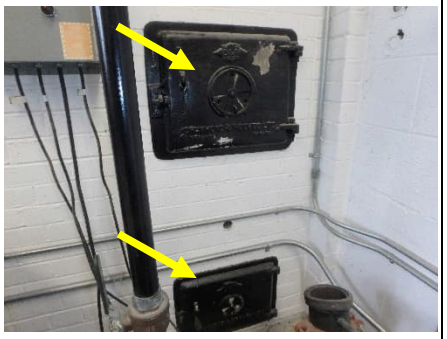
ACTION 5: Proactive asbestos-containing material removal. Removal of asbestos-containing material in lieu of repair may be considered, even if it is in GOOD condition at locations, where asbestos-containing material is easily accessible, limited in quantity, and removal would be cost-effective.

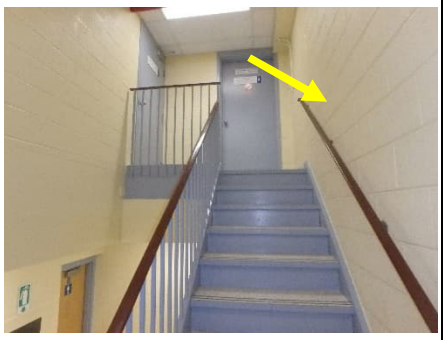
ACTION 6: Asbestos-containing material repair. Asbestos-containing material may be repaired if found in FAIR condition and not likely to be damaged again or disturbed by normal use of the area or room. Upon completion of the repair work, asbestos-containing material is to be treated as being in GOOD condition and ACTION 7 is to be implemented. If asbestos-containing material is likely to be damaged or disturbed during normal use of the area or room, ACTION 5 is to be implemented.

ACTION 7: Routine Surveillance. Routine surveillance of the asbestos-containing material is to be instituted. Trained workers or service providers must use appropriate asbestos precautions (low, intermediate, or high) during disturbance of the remaining asbestos-containing material.

Table B.2: Summary of Materials Visually Assessed and Sampled for Metals Analysis

Description / Location of Material	Condition	Observed Estimated Quantity.	Sample Number	Metals Concentration (ug/g)		Metal-Containing Paint / Material (Yes/No)	Photograph
Grey Floor Paint in Mechanical Room	**Poor**	**48m²**	**HR26-Pb-01**	Arsenic	<50	No	
				Chromium	<50	No	
				Lead	**553**	**Yes**	
				Mercury	<2	No	
White Wall Paint in Mechanical Room	**Fair/Poor**	**84m²**	**HR26-Pb-02**	Arsenic	<50	No	
				Chromium	**127**	**Yes**	
				Lead	**295**	**Yes**	
				Mercury	<2	No	

Description / Location of Material	Condition	Observed Estimated Quantity.	Sample Number	Metals Concentration (ug/g)		Metal-Containing Paint / Material (Yes/No)	Photograph
Black Paint on Chimney Doors in Mechanical Room	**Fair**	**<1m²**	**HR26-Pb-03**	Arsenic	<50	No	
				Chromium	**227**	**Yes**	
				Lead	**2,060**	**Yes**	
				Mercury	<2	No	
Beige Duct Paint in Mechanical Room	**Fair**	**15m²**	**HR26-Pb-04**	Arsenic	<50	No	
				Chromium	**98**	**Yes**	
				Lead	**2,010**	**Yes**	
				Mercury	<2	No	

Description / Location of Material	Condition	Observed Estimated Quantity.	Sample Number	Metals Concentration (ug/g)		Metal-Containing Paint / Material (Yes/No)	Photograph
Yellow Corridor/Stairwell Wall Paint	**Good**	**980m^2**	**HR26-Pb-05**	Arsenic	<50	No	
				Chromium	<50	No	
				Lead	**545**	**Yes**	
				Mercury	3	No	
Blue Classroom and Office Wood Door and Frame Paint	N/A	N/A	HR26-Pb-06	Arsenic	<50	No	
				Chromium	<50	No	
				Lead	81	No	
				Mercury	<2	No	

Description / Location of Material	Condition	Observed Estimated Quantity.	Sample Number	Metals Concentration (ug/g)		Metal-Containing Paint / Material (Yes/No)	Photograph
Brown Exterior Door Paint	**Poor**	**4m^2**	**HR26-Pb-07**	Arsenic	<50	No	
				Chromium	**2,180**	**Yes**	
				Lead	**9,490**	**Yes**	
				Mercury	<2	No	
Blue Duct Paint in Room 307	**Fair/Poor**	**15m^2**	**HR26-Pb-08**	Arsenic	<50	No	
				Chromium	**58**	**Yes**	
				Lead	**1,030**	**Yes**	
				Mercury	<2	No	

Description / Location of Material	Condition	Observed Estimated Quantity.	Sample Number	Metals Concentration (ug/g)		Metal-Containing Paint / Material (Yes/No)	Photograph
Yellow/Beige Paint in Mechanical Room Of 208/211	N/A	N/A	HR26-Pb-09	Arsenic	<50	No	
				Chromium	<50	No	
				Lead	16	No	
				Mercury	<2	No	
Brown Paint on Exterior South Entrance Awning	**Poor**	**15m^2**	**HR26-Pb-10**	Arsenic	<50	No	
				Chromium	<50	No	
				Lead	**240**	**Yes**	
				Mercury	<2	No	

Description / Location of Material	Condition	Observed Estimated Quantity.	Sample Number	Metals Concentration (ug/g)		Metal-Containing Paint / Material (Yes/No)	Photograph
Beige Paint on Exterior Transite Panels	**Poor**	**65m²**	**HR26-Pb-11**	Arsenic	<50	No	
				Chromium	**60**	**Yes**	
				Lead	**1,600**	**Yes**	
				Mercury	<2	No	

Notes:
(1) When the result is preceded with a less than symbol ("<"), the result is lower than the Minimum Detection Limit (MDL).
(2) The material was not sampled to maintain material function and integrity. The Material has been presumed to be metals-containing until laboratory analysis confirms otherwise.

Table B.3: Summary of Materials Visually Assessed and Sampled for PCB Analysis

Description / Location of Material	Condition	Sample Number	PCB Concentration (ug/g)	PCB-Containing Material (Yes/No)	Photograph
Grey Floor Paint in Mechanical Room	N/A	HR26-Pb-01	14.2	No	
White Wall Paint in Mechanical Room	N/A	HR26-Pb-02	<5	No	

Description / Location of Material	Condition	Sample Number	PCB Concentration (ug/g)	PCB-Containing Material (Yes/No)	Photograph
Beige Duct Paint in Mechanical Room	N/A	HR26-Pb-04	<5	No	
Yellow Corridor/Stairwell Wall Paint	N/A	HR26-Pb-05	<5	No	
Blue Classroom and Office Wood Door and Frame Paint	N/A	HR26-Pb-06	<5	No	

Description / Location of Material	Condition	Sample Number	PCB Concentration (ug/g)	PCB-Containing Material (Yes/No)	Photograph
Brown Exterior Door Paint	N/A	HR26-Pb-07	<5	No	
Blue Duct Paint in Room 307	N/A	HR26-Pb-08	<5	No	
Yellow/Beige Paint in Mechanical Room Of 208/211	N/A	HR26-Pb-09	<5	No	

Description / Location of Material	Condition	Sample Number	PCB Concentration (ug/g)	PCB-Containing Material (Yes/No)	Photograph
Brown Paint on Exterior South Entrance Awning	N/A	HR26-Pb-10	<5	No	
Beige Paint on Exterior Transite Panels	N/A	HR26-Pb-11	<5	No	

Notes:
(1) When the result is preceded with a less than symbol ("<"), the result is lower than the Minimum Detection Limit (MDL).

Table B.4: Summary of Materials Sampled for TCLP Leachate Metals Analysis

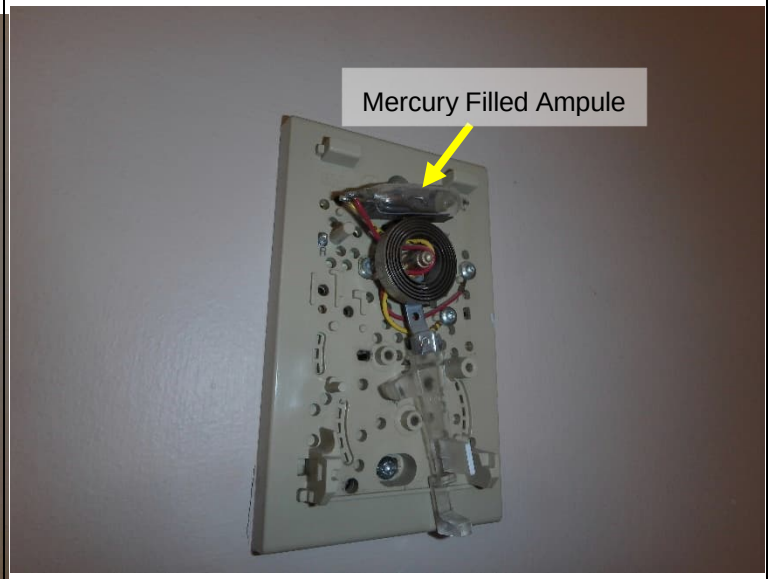
Description / Location of Material	Condition	Sample Number	Laboratory Results (mg/L)		O. Reg. 347Schedule 4 Criteria (mg/L)	Photograph
Grey Floor Paint in Mechanical Room	Poor	HR26-Pb-01	Lead	<0.14	5	
White Wall Paint in Mechanical Room	Poor	HR26-Pb-02	Lead	0.15	5	

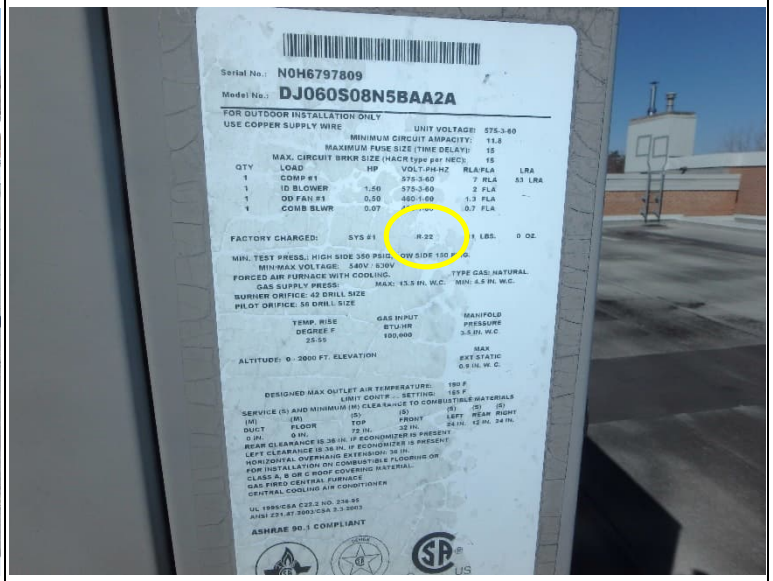
Description / Location of Material	Condition	Sample Number	Laboratory Results (mg/L)		O. Reg. 347Schedule 4 Criteria (mg/L)	Photograph
Blue Duct Paint in Room 307	Poor	HR26-Pb-08	Lead	2.05	5	
Brown Paint on Exterior South Entrance Awning	Poor	HR26-Pb-10	Lead	0.35	5	

Description / Location of Material	Condition	Sample Number	Laboratory Results (mg/L)		O. Reg. 347Schedule 4 Criteria (mg/L)	Photograph
Beige Paint on Exterior Transite Panels	Poor	HR26-Pb-11	Lead	0.24	5	

Notes:
Composite samples were collected and submitted, based on WSP's assumptions of waste streams.
Bold indicates an exceedance of the assessment limit.

Table B.5: Additional Site Photographs

Description / Location of Material	Condition	Photograph	
Photo of mercury-containing thermostat. Approximately 8 units observed within the subject building at the time of the assessment.	Good		

Description / Location of Material	Condition	Photograph	
Photos of rooftop air conditioning units labelled as containing R-22 (HCFC-22), an Ozone-Depleting Substance.	Good		

APPENDIX C

Laboratory Test Reports

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Certificate of Analysis

WSP Canada Inc. (Ottawa)

2611 Queensview Dr, Suite 300
Ottawa, ON K2B 8K2
Attn: Raymond Ockrant

Client PO:
Project: CA0045921.6599-Task 0003
Custody:

Report Date: 3-Mar-2025
Order Date: 25-Feb-2025

Order #: 2509205

This Certificate of Analysis contains analytical data applicable to the following samples as submitted :

Paracel ID	Client ID
2509205-01	HR26-GLAZ-01A
2509205-02	HR26-GLAZ-01B
2509205-03	HR26-GLAZ-01C
2509205-04	HR26-SEAL-02A
2509205-05	HR26-SEAL-02B
2509205-06	HR26-SEAL-02C
2509205-07	HR26-PPS-03A
2509205-08	HR26-PPS-03B
2509205-09	HR26-PPS-03C
2509205-10	HR26-GLAZ-04A
2509205-11	HR26-GLAZ-04B
2509205-12	HR26-GLAZ-04C
2509205-13	HR26-VFT-05A
2509205-14	HR26-VFT-05B
2509205-15	HR26-VFT-05C
2509205-16	HR26-MAS-06A
2509205-17	HR26-MAS-06B
2509205-18	HR26-MAS-06C
2509205-19	HR26-VFT-07A
2509205-20	HR26-VFT-07B
2509205-21	HR26-VFT-07C
2509205-22	HR26-EXP-08A
2509205-23	HR26-EXP-08B
2509205-24	HR26-EXP-08C
2509205-25	HR26-CLK-09A
2509205-26	HR26-CLK-09B

Approved By:



Emma Diaz

Senior Analyst

Any use of these results implies your agreement that our total liabilty in connection with this work, however arising, shall be limited to the amount paid by you for this work, and that our employees or agents shall not under any circumstances be liable to you in connection with this work.

Certificate of Analysis

Report Date: 03-Mar-2025

Client: WSP Canada Inc. (Ottawa)

Order Date: 25-Feb-2025

Client PO:

Project Description: CA0045921.6599-Task 0003

2509205-27	HR26-CLK-09C
2509205-28	HR26-GLAZ-10A
2509205-29	HR26-GLAZ-10B
2509205-30	HR26-GLAZ-10C
2509205-31	HR26-CLK-11A
2509205-32	HR26-CLK-11B
2509205-33	HR26-CLK-11C

Certificate of Analysis

Client: **WSP Canada Inc. (Ottawa)**

Client PO:

Report Date: 03-Mar-2025

Order Date: 25-Feb-2025

Project Description: CA0045921.6599-Task 0003

Asbestos, PLM Visual Estimation **MDL - 0.5%**

Paracel ID	Sample Date	Colour	Description	Asbestos Detected	Material Identification	% Content
2509205-01	24-Feb-25	Grey	Glazing	Yes	**Client ID: HR26-GLAZ-01A**	
					Chrysotile	1
					MMVF	1
					Non-Fibers	98
2509205-02	24-Feb-25	Grey	Glazing		**Client ID: HR26-GLAZ-01B**	
					not analyzed, positive stop	
2509205-03	24-Feb-25	Grey	Glazing		**Client ID: HR26-GLAZ-01C**	
					not analyzed, positive stop	
2509205-04	24-Feb-25	Grey	Duct Seal	No	**Client ID: HR26-SEAL-02A**	
					Non-Fibers	100
2509205-05	24-Feb-25	Grey	Duct Seal	No	**Client ID: HR26-SEAL-02B**	
					Non-Fibers	100
2509205-06	24-Feb-25	Grey	Duct Seal	No	**Client ID: HR26-SEAL-02C**	
					Non-Fibers	100
2509205-07	24-Feb-25	Beige	Pipe Seal	No	**Client ID: HR26-PPS-03A**	
					Non-Fibers	100
2509205-08	24-Feb-25	Beige	Pipe Seal	No	**Client ID: HR26-PPS-03B**	
					Non-Fibers	100
2509205-09	24-Feb-25	Beige	Pipe Seal	No	**Client ID: HR26-PPS-03C**	
					Non-Fibers	100
2509205-10	24-Feb-25	Black	Glazing	No	**Client ID: HR26-GLAZ-04A** [Z-01]	
					Non-Fibers	100
2509205-11	24-Feb-25	Black	Glazing	No	**Client ID: HR26-GLAZ-04B** [Z-01]	
					Non-Fibers	100
2509205-12	24-Feb-25	Black	Glazing	No	**Client ID: HR26-GLAZ-04C** [Z-01]	
					Non-Fibers	100

Certificate of Analysis

Report Date: 03-Mar-2025

Client: WSP Canada Inc. (Ottawa)

Order Date: 25-Feb-2025

Client PO:

Project Description: CA0045921.6599-Task 0003

Asbestos, PLM Visual Estimation **MDL - 0.5%**

Paracel ID	Sample Date	Colour	Description	Asbestos Detected	Material Identification	% Content
2509205-13	24-Feb-25	Beige	Vinyl Floor Tile	No	**Client ID: HR26-VFT-05A**	
					Non-Fibers	100
2509205-14	24-Feb-25	Beige	Vinyl Floor Tile	No	**Client ID: HR26-VFT-05B**	
					Non-Fibers	100
2509205-15	24-Feb-25	Beige	Vinyl Floor Tile	No	**Client ID: HR26-VFT-05C**	
					Non-Fibers	100
2509205-16	24-Feb-25	Beige	Mastic	No	**Client ID: HR26-MAS-06A**	
					Non-Fibers	100
2509205-17	24-Feb-25	Beige	Mastic	No	**Client ID: HR26-MAS-06B**	
					Non-Fibers	100
2509205-18	24-Feb-25	Beige	Mastic	No	**Client ID: HR26-MAS-06C**	
					Non-Fibers	100
2509205-19	24-Feb-25	Off-white	Vinyl Floor Tile	Yes	**Client ID: HR26-VFT-07A**	
					Chrysotile	1
					Non-Fibers	99
2509205-20	24-Feb-25	Off-white	Vinyl Floor Tile		**Client ID: HR26-VFT-07B**	
					not analyzed, positive stop	
2509205-21	24-Feb-25	Off-white	Vinyl Floor Tile		**Client ID: HR26-VFT-07C**	
					not analyzed, positive stop	
2509205-22	24-Feb-25	Grey	Sealant	No	**Client ID: HR26-EXP-08A**	
					Cellulose	5
					Non-Fibers	90
					Other fibers	5
2509205-23	24-Feb-25	Grey	Sealant	No	**Client ID: HR26-EXP-08B**	
					Cellulose	5
					Non-Fibers	90
					Other fibers	5

Certificate of Analysis

Report Date: 03-Mar-2025

Client: WSP Canada Inc. (Ottawa)

Order Date: 25-Feb-2025

Client PO:

Project Description: CA0045921.6599-Task 0003

Asbestos, PLM Visual Estimation **MDL - 0.5%**

Paracel ID	Sample Date	Colour	Description	Asbestos Detected	Material Identification	% Content
2509205-24	24-Feb-25	Grey	Sealant	No	**Client ID: HR26-EXP-08C**	
					Cellulose	5
					Non-Fibers	90
					Other fibers	5
2509205-25	24-Feb-25	Grey	Caulking	No	**Client ID: HR26-CLK-09A**	
					Cellulose	5
					Non-Fibers	90
					Other fibers	5
2509205-26	24-Feb-25	Grey	Caulking	No	**Client ID: HR26-CLK-09B**	
					Cellulose	5
					Non-Fibers	90
					Other fibers	5
2509205-27	24-Feb-25	Grey	Caulking	No	**Client ID: HR26-CLK-09C**	
					Cellulose	5
					Non-Fibers	90
					Other fibers	5
2509205-28	24-Feb-25	Black	Glazing	No	**Client ID: HR26-GLAZ-10A**	
					Cellulose	2
					Non-Fibers	98
2509205-29	24-Feb-25	Black	Glazing	No	**Client ID: HR26-GLAZ-10B**	
					Cellulose	2
					Non-Fibers	98
2509205-30	24-Feb-25	Black	Glazing	No	**Client ID: HR26-GLAZ-10C**	
					Cellulose	2
					Non-Fibers	98
2509205-31	24-Feb-25	Grey	Caulking	No	**Client ID: HR26-CLK-11A**	
					Non-Fibers	100
2509205-32	24-Feb-25	Grey	Caulking	No	**Client ID: HR26-CLK-11B**	
					Non-Fibers	100

Certificate of Analysis

Client: WSP Canada Inc. (Ottawa)

Client PO:

Report Date: 03-Mar-2025

Order Date: 25-Feb-2025

Project Description: CA0045921.6599-Task 0003

Asbestos, PLM Visual Estimation **MDL - 0.5%**

Paracel ID	Sample Date	Colour	Description	Asbestos Detected	Material Identification	% Content
2509205-33	24-Feb-25	Grey	Caulking	No	**Client ID: HR26-CLK-11C**	
					Non-Fibers	100

* MMVF: Man Made Vitreous Fibers: Fiberglass, Mineral Wool, Rockwool, Glasswool

** **Analytes in bold indicate asbestos mineral content.**

Analysis Summary Table

Analysis	Method Reference/Description	Lab Location	Lab Accreditation	Analysis Date
Asbestos, PLM Visual Estimation	AppE to SubE of 40CFR Part763 and EPA/600/R-93/116	2 - Ottawa West	CALA 1262	3-Mar-25

Ottawa West Lab: 25 Northside Rd, Unit C Nepean, Ontario K2H 8S1

Qualifier Notes

Sample Qualifiers :

Z-01: Sample appears to be grey

Work Order Revisions | Comments

None

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Ottawa, ON K2B 8K2
Attn: Raymond Ockrant

Client PO:
Project: CA0045921.6599-Task 0003
Custody:

Report Date: 26-Mar-2025
Order Date: 20-Mar-2025

Order #: 2512416

This Certificate of Analysis contains analytical data applicable to the following samples as submitted :

Paracel ID	Client ID
2512416-01	HR26-TRANS-12A
2512416-02	HR26-TRANS-12B
2512416-03	HR26-TRANS-12C
2512416-04	HR26-PUTTY-13A
2512416-05	HR26-PUTTY-13B
2512416-06	HR26-PUTTY-13C

Approved By:



Emma Diaz

Lab Manager

Any use of these results implies your agreement that our total liabilty in connection with this work, however arising, shall be limited to the amount paid by you for this work, and that our employees or agents shall not under any circumstances be liable to you in connection with this work.

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Order #: 2512416

Certificate of Analysis

Client: WSP Canada Inc. (Ottawa)

Client PO:

Report Date: 26-Mar-2025

Order Date: 20-Mar-2025

Project Description: CA0045921.6599-Task 0003

Asbestos, PLM Visual Estimation **MDL - 0.5%**

Paracel ID	Sample Date	Colour	Description	Asbestos Detected	Material Identification	% Content
2512416-01	18-Mar-25	Grey	Transite	Yes	**Client ID: HR26-TRANS-12A**	
					Amosite	5
					Chrysotile	10
					Non-Fibers	85
2512416-02	18-Mar-25	Grey	Transite		**Client ID: HR26-TRANS-12B**	
					not analyzed, positive stop	
2512416-03	18-Mar-25	Grey	Transite		**Client ID: HR26-TRANS-12C**	
					not analyzed, positive stop	
2512416-04	18-Mar-25	Beige	Putty	No	**Client ID: HR26-PUTTY-13A**	
					Non-Fibers	100
2512416-05	18-Mar-25	Beige	Putty	No	**Client ID: HR26-PUTTY-13B**	
					Non-Fibers	100
2512416-06	18-Mar-25	Beige	Putty	No	**Client ID: HR26-PUTTY-13C**	
					Non-Fibers	100

**** Analytes in bold indicate asbestos mineral content.**

Analysis Summary Table

Analysis	Method Reference/Description	Lab Location	Lab Accreditation	Analysis Date
Asbestos, PLM Visual Estimation	AppE to SubE of 40CFR Part763 and EPA/600/R-93/116	2 - Ottawa West	CALA 1262	26-Mar-25

Ottawa West Lab: 25 Northside Rd, Unit C Nepean, Ontario K2H 8S1

Work Order Revisions | Comments

None

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Certificate of Analysis

WSP Canada Inc. (Ottawa)
2611 Queensview Dr, Suite 300
Ottawa, ON K2B 8K2
Attn: Raymond Ockrant

Client PO:
Project: CA0045921.6599-Task 003
Custody:

Report Date: 28-Feb-2025
Order Date: 25-Feb-2025

Order #: 2509258

This Certificate of Analysis contains analytical data applicable to the following samples as submitted:

Paracel ID	Client ID
2509258-01	HR26-Pb-01 grey floor paint in mechanical room
2509258-02	HR26-Pb-02 white wall paint in mechanical room
2509258-03	HR26-Pb-03 black paint on chimney doors in mech. room
2509258-04	HR26-Pb-04 beige duct paint in mechanical room
2509258-05	HR26-Pb-05 yellow corridor/stairwell wall paint
2509258-06	HR26-Pb-06 Blue classroom and office door paint
2509258-07	HR26-Pb-07 Brown exterior door paint
2509258-08	HR26-Pb-08 Blue duct paint in room 307

Approved By:

Mark Foto

Mark Foto, M.Sc.
Laboratory Director

Analysis Summary Table

Analysis	Method Reference/Description	Extraction Date	Analysis Date
Mercury by CVAA	EPA 7471B - CVAA, digestion	28-Feb-25	28-Feb-25
Metals, ICP-MS	EPA 6020 - Digestion - ICP-MS	26-Feb-25	27-Feb-25
PCBs, total	based on SW846 8082A - GC-ECD	26-Feb-25	26-Feb-25

PARACEL LABORATORIES LTD.

Order #: 2509258

Certificate of Analysis

Report Date: 28-Feb-2025

Client: **WSP Canada Inc. (Ottawa)**

Order Date: 25-Feb-2025

Client PO:

Project Description: CA0045921.6599-Task 003

	Client ID:	HR26-Pb-01 grey floor paint in mechanical room	HR26-Pb-02 white wall paint in mechanical room	HR26-Pb-03 black paint on chimney doors in mech. room	HR26-Pb-04 beige duct paint in mechanical room	-	-
	Sample Date:	24-Feb-25 09:00	24-Feb-25 09:00	24-Feb-25 09:00	24-Feb-25 09:00		
	Sample ID:	2509258-01	2509258-02	2509258-03	2509258-04		
	Matrix:	Paint	Paint	Paint	Paint		
	MDL/Units						
Metals							
Arsenic	50 ug/g	<50 [1]	<50 [1]	<50	<50	-	-
Chromium	50 ug/g	<50 [1]	127 [1]	227	98	-	-
Lead	5 ug/g	553 [1]	295 [1]	2060	2010	-	-
Mercury	2 ug/g	<2 [1]	<2 [1]	<2	6	-	-
PCBs							
PCBs, total	5.0 ug/g	14.2	<5.0	-	<5.0	-	-
Decachlorobiphenyl	Surrogate	93.7%	95.8%	-	85.2%	-	-

Certificate of Analysis

Report Date: 28-Feb-2025

Client: **WSP Canada Inc. (Ottawa)**

Order Date: 25-Feb-2025

Client PO:

Project Description: CA0045921.6599-Task 003

	Client ID:	HR26-Pb-05 yellow corridor/stairwell wall paint	HR26-Pb-06 Blue classroom and office door paint	HR26-Pb-07 Brown exterior door paint	HR26-Pb-08 Blue duct paint in room 307	-	-
	Sample Date:	24-Feb-25 09:00	24-Feb-25 09:00	24-Feb-25 09:00	24-Feb-25 09:00		
	Sample ID:	2509258-05	2509258-06	2509258-07	2509258-08		
	Matrix:	Paint	Paint	Paint	Paint		
	MDL/Units						
Metals							
Arsenic	50 ug/g	<50 [1]	<50 [1]	<50	<50	-	-
Chromium	50 ug/g	<50 [1]	<50 [1]	2180	58	-	-
Lead	5 ug/g	545 [1]	81 [1]	9490	1030	-	-
Mercury	2 ug/g	<2 [1]	<2 [1]	<2	6	-	-
PCBs							
PCBs, total	5.0 ug/g	<5.0	<5.0	<5.0	<5.0	-	-
Decachlorobiphenyl	Surrogate	82.7%	141%	87.9%	86.8%	-	-

Method Quality Control: Blank

Analyte	Result	Reporting Limit	Units	%REC	%REC Limit	RPD	RPD Limit	Notes
Metals								
Arsenic	ND	50	ug/g					
Chromium	ND	50	ug/g					
Lead	ND	5	ug/g					
Mercury	ND	2	ug/g					
PCBs								
PCBs, total	ND	5.0	ug/g					
Surrogate: Decachlorobiphenyl	*4.17*		*%*	*83.4*	*43-142*			

Method Quality Control: Duplicate

Analyte	Result	Reporting Limit	Units	Source Result	%REC	%REC Limit	RPD	RPD Limit	Notes
Metals									
Arsenic	ND	50	ug/g	ND			NC	50	
Chromium	92.0	50	ug/g	97.8			6.1	50	
Lead	1960	5	ug/g	2010			2.5	50	
Mercury	ND	2	ug/g	ND			NC	30	

Method Quality Control: Spike

Analyte	Result	Reporting Limit	Units	Source Result	%REC	%REC Limit	RPD	RPD Limit	Notes
Metals									
Arsenic	53.8	50	ug/g	ND	107	70-130			
Chromium	63.1	50	ug/g	ND	118	70-130			
Lead	126	5	ug/g	80.5	90.3	70-130			
Mercury	14	2	ug/g	ND	91.0	70-130			
PCBs									
PCBs, total	17.6	5.0	ug/g	ND	87.8	58-147			
Surrogate: Decachlorobiphenyl	*4.85*		*%*		*97.0*	*43-142*			

Qualifier Notes:

Sample Qualifiers :

1: Complete separation of paint from substrate not possible for this sample and a small amount of substrate has been included in the paint digestion.

Sample Data Revisions:

None

Work Order Revisions / Comments:

None

Other Report Notes:

n/a: not applicable

ND: Not Detected

MDL: Method Detection Limit

Source Result: Data used as source for matrix and duplicate samples

%REC: Percent recovery.

RPD: Relative percent difference.

NC: Not Calculated

Any use of these results implies your agreement that our total liabilty in connection with this work, however arising, shall be limited to the amount paid by you for this work, and that our employees or agents shall not under any circumstances be liable to you in connection with this work.

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Certificate of Analysis

WSP Canada Inc. (Ottawa)
2611 Queensview Dr, Suite 300
Ottawa, ON K2B 8K2
Attn: Raymond Ockrant

Client PO:
Project: CA0045921.6599-Task 003
Custody:

Report Date: 26-Mar-2025
Order Date: 20-Mar-2025

Order #: 2512440

This Certificate of Analysis contains analytical data applicable to the following samples as submitted:

Paracel ID	Client ID
2512440-01	HR26-Pb-09 Yellow/Beige paint in mech. rm of 208/211
2512440-02	HR26-Pb-10 Brown paint on ext. south entrance awning
2512440-03	HR26-Pb-10 Brown paint on ext. south entrance awning
2512440-04	HR26-Pb-11 Beige paint on exterior transite panels
2512440-05	HR26-Pb-11 Beige paint on exterior transite panels

Approved By:

Mark Foto

Mark Foto, M.Sc.
Laboratory Director

Analysis Summary Table

Analysis	Method Reference/Description	Extraction Date	Analysis Date
Mercury by CVAA	EPA 7471B - CVAA, digestion	24-Mar-25	24-Mar-25
Metals, ICP-MS	EPA 6020 - Digestion - ICP-MS	24-Mar-25	24-Mar-25
Metals, ICP-MS	TCLP EPA 6020 - Digestion - ICP-MS	25-Mar-25	25-Mar-25
PCBs, total	based on SW846 8082A - GC-ECD	25-Mar-25	25-Mar-25
Solids, %	CWS Tier 1 - Gravimetric	24-Mar-25	24-Mar-25

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Order #: 2512440

Certificate of Analysis

Report Date: 26-Mar-2025

Client: **WSP Canada Inc. (Ottawa)**

Order Date: 20-Mar-2025

Client PO:

Project Description: CA0045921.6599-Task 003

	Client ID:	HR26-Pb-09 Yellow/Beige paint in mech. rm of 208/211	HR26-Pb-10 Brown paint on ext. south entrance awning	HR26-Pb-10 Brown paint on ext. south entrance awning	HR26-Pb-11 Beige paint on exterior transite panels	-	-
	Sample Date:	18-Mar-25 09:00	18-Mar-25 09:00	18-Mar-25 09:00	18-Mar-25 09:00		
	Sample ID:	2512440-01	2512440-02	2512440-03	2512440-04		
	Matrix:	Paint	Paint	Paint	Paint		
	MDL/Units						
Physical Characteristics							
% Solids	0.1 % by Wt.	-	-	100	-	-	-
EPA 1311 - TCLP Leachate Metals							
Lead	0.05 mg/L	-	-	0.35	-	-	-
Metals							
Arsenic	50 ug/g	<50 [1]	<50 [1]	-	<50 [1]	-	-
Chromium	50 ug/g	<50 [1]	<50 [1]	-	60 [1]	-	-
Lead	5 ug/g	16 [1]	240 [1]	-	1600 [1]	-	-
Mercury	2 ug/g	<2 [1]	3 [1]	-	3 [1]	-	-
PCBs							
PCBs, total	5.0 ug/g	<5.0	<5.0	-	<5.0	-	-
Decachlorobiphenyl	Surrogate	124%	138%	-	130%	-	-

Certificate of Analysis

Report Date: 26-Mar-2025

Client: **WSP Canada Inc. (Ottawa)**

Order Date: 20-Mar-2025

Client PO:

Project Description: CA0045921.6599-Task 003

	Client ID:	HR26-Pb-11 Beige paint on exterior transite panels				-	-
	Sample Date:	18-Mar-25 09:00					
	Sample ID:	2512440-05					
	Matrix:	Paint					
	MDL/Units						
Physical Characteristics							
% Solids	0.1 % by Wt.	100	-	-	-	-	-
EPA 1311 - TCLP Leachate Metals							
Lead	0.05 mg/L	0.24	-	-	-	-	-

Method Quality Control: Blank

Analyte	Result	Reporting Limit	Units	%REC	%REC Limit	RPD	RPD Limit	Notes
EPA 1311 - TCLP Leachate Metals								
Lead	ND	0.05	mg/L					
Metals								
Arsenic	ND	50	ug/g					
Chromium	ND	50	ug/g					
Lead	ND	5	ug/g					
Mercury	ND	2	ug/g					
PCBs								
PCBs, total	ND	5.0	ug/g					
Surrogate: Decachlorobiphenyl	*6.00*		*%*	*120*	*43-142*			

Method Quality Control: Duplicate

Analyte	Result	Reporting Limit	Units	Source Result	%REC	%REC Limit	RPD	RPD Limit	Notes
EPA 1311 - TCLP Leachate Metals									
Lead	0.363	0.05	mg/L	0.347			4.3	32	
Metals									
Arsenic	ND	50	ug/g	ND			NC	50	
Chromium	ND	50	ug/g	ND			NC	50	
Lead	194	5	ug/g	240			20.9	50	
Mercury	ND	2	ug/g	ND			NC	30	
PCBs									
PCBs, total	ND	5.0	ug/g	ND			NC	35	
Surrogate: Decachlorobiphenyl	*6.80*		*%*		*136*	*43-142*			
Physical Characteristics									
% Solids	91.8	0.1	% by Wt.	92.1			0.3	25	

Method Quality Control: Spike

Analyte	Result	Reporting Limit	Units	Source Result	%REC	%REC Limit	RPD	RPD Limit	Notes
EPA 1311 - TCLP Leachate Metals									
Lead	82.4	0.05	mg/L	34.7	95.4	77-126			
Metals									
Arsenic	52.1	50	ug/g	ND	104	70-130			
Chromium	58.4	50	ug/g	ND	116	70-130			
Lead	50.5	5	ug/g	9.6	81.7	70-130			
Mercury	14	2	ug/g	ND	91.6	70-130			
PCBs									
PCBs, total	21.3	5.0	ug/g	ND	106	58-147			
Surrogate: Decachlorobiphenyl	*6.82*		*%*		*136*	*43-142*			

Qualifier Notes:

Login Qualifiers :

TCLP/mSPLP extraction method deviated as 100g sample solids was not available for leaching. A lower mass was used, but the 20:1 liquid to solid ratio was maintained for the extraction.

Applies to Samples: HR26-Pb-10 Brown paint on ext. south entrance awning, HR26-Pb-11 Beige paint on exterior transite panels

Sample Qualifiers :

1: Complete separation of paint from substrate not possible for this sample and a small amount of substrate has been included in the paint digestion.

Sample Data Revisions:

None

Work Order Revisions / Comments:

None

Other Report Notes:

n/a: not applicable

ND: Not Detected

MDL: Method Detection Limit

Source Result: Data used as source for matrix and duplicate samples

%REC: Percent recovery.

RPD: Relative percent difference.

NC: Not Calculated

Soil results are reported on a dry weight basis unlesss otherwise noted.

Where %Solids is reported, moisture loss includes the loss of volatile hydrocarbons.

Any use of these results implies your agreement that our total liabilty in connection with this work, however arising, shall be limited to the amount paid by you for this work, and that our employees or agents shall not under any circumstances be liable to you in connection with this work.

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Certificate of Analysis

WSP Canada Inc. (Ottawa)
2611 Queensview Dr, Suite 300
Ottawa, ON K2B 8K2
Attn: Raymond Ockrant

Client PO:
Project: CA0045921.6599-Task 003
Custody:

Report Date: 28-Feb-2025
Order Date: 25-Feb-2025

Order #: 2509264

This Certificate of Analysis contains analytical data applicable to the following samples as submitted:

Paracel ID	Client ID
2509264-01	HR26-Pb-01 grey floor paint in mechanical room
2509264-02	HR26-Pb-02 white wall paint in mechanical room
2509264-03	HR26-Pb-08 Blue duct paint in room 307

Approved By:

Mark Foto

Mark Foto, M.Sc.
Laboratory Director

Analysis Summary Table

Analysis	Method Reference/Description	Extraction Date	Analysis Date
Metals, ICP-MS	TCLP EPA 6020 - Digestion - ICP-MS	27-Feb-25	27-Feb-25
Solids, %	CWS Tier 1 - Gravimetric	27-Feb-25	28-Feb-25

Certificate of Analysis

Report Date: 28-Feb-2025

Client: **WSP Canada Inc. (Ottawa)**

Order Date: 25-Feb-2025

Client PO:

Project Description: CA0045921.6599-Task 003

	Client ID:	HR26-Pb-01 grey floor paint in mechanical room	HR26-Pb-02 white wall paint in mechanical room	HR26-Pb-08 Blue duct paint in room 307	-		
	Sample Date:	24-Feb-25 09:00	24-Feb-25 09:00	24-Feb-25 09:00	-	-	-
	Sample ID:	2509264-01	2509264-02	2509264-03	-		
	Matrix:	Paint	Paint	Paint	-		
	MDL/Units						
Physical Characteristics							
% Solids	0.1 % by Wt.	100	100	100	-	-	-
EPA 1311 - TCLP Leachate Metals							
Lead	0.05 mg/L	<0.14 [1]	0.15	2.05	-	-	-

Method Quality Control: Blank

Analyte	Result	Reporting Limit	Units	%REC	%REC Limit	RPD	RPD Limit	Notes
EPA 1311 - TCLP Leachate Metals								
Lead	ND	0.05	mg/L					

Method Quality Control: Duplicate

Analyte	Result	Reporting Limit	Units	Source Result	%REC	%REC Limit	RPD	RPD Limit	Notes
EPA 1311 - TCLP Leachate Metals									
Lead	ND	0.05	mg/L	ND			NC	32	
Physical Characteristics									
% Solids	87.7	0.1	% by Wt.	88.0			0.3	25	

Method Quality Control: Spike

Analyte	Result	Reporting Limit	Units	Source Result	%REC	%REC Limit	RPD	RPD Limit	Notes
EPA 1311 - TCLP Leachate Metals									
Lead	47.9	0.05	mg/L	0.301	95.3	77-126			

Qualifier Notes:

Login Qualifiers :

TCLP/mSPLP extraction method deviated as 100g sample solids was not available for leaching. A lower mass was used, but the 20:1 liquid to solid ratio was maintained for the extraction.

Applies to Samples: HR26-Pb-01 grey floor paint in mechanical room, HR26-Pb-02 white wall paint in mechanical room, HR26-Pb-08 Blue duct paint in room 307

Sample Qualifiers :

1: Elevated Reporting Limits due to limited sample volume.

Applies to Samples: HR26-Pb-01 grey floor paint in mechanical room

Sample Data Revisions:

None

Work Order Revisions / Comments:

None

Other Report Notes:

n/a: not applicable

ND: Not Detected

MDL: Method Detection Limit

Source Result: Data used as source for matrix and duplicate samples

%REC: Percent recovery.

RPD: Relative percent difference.

NC: Not Calculated

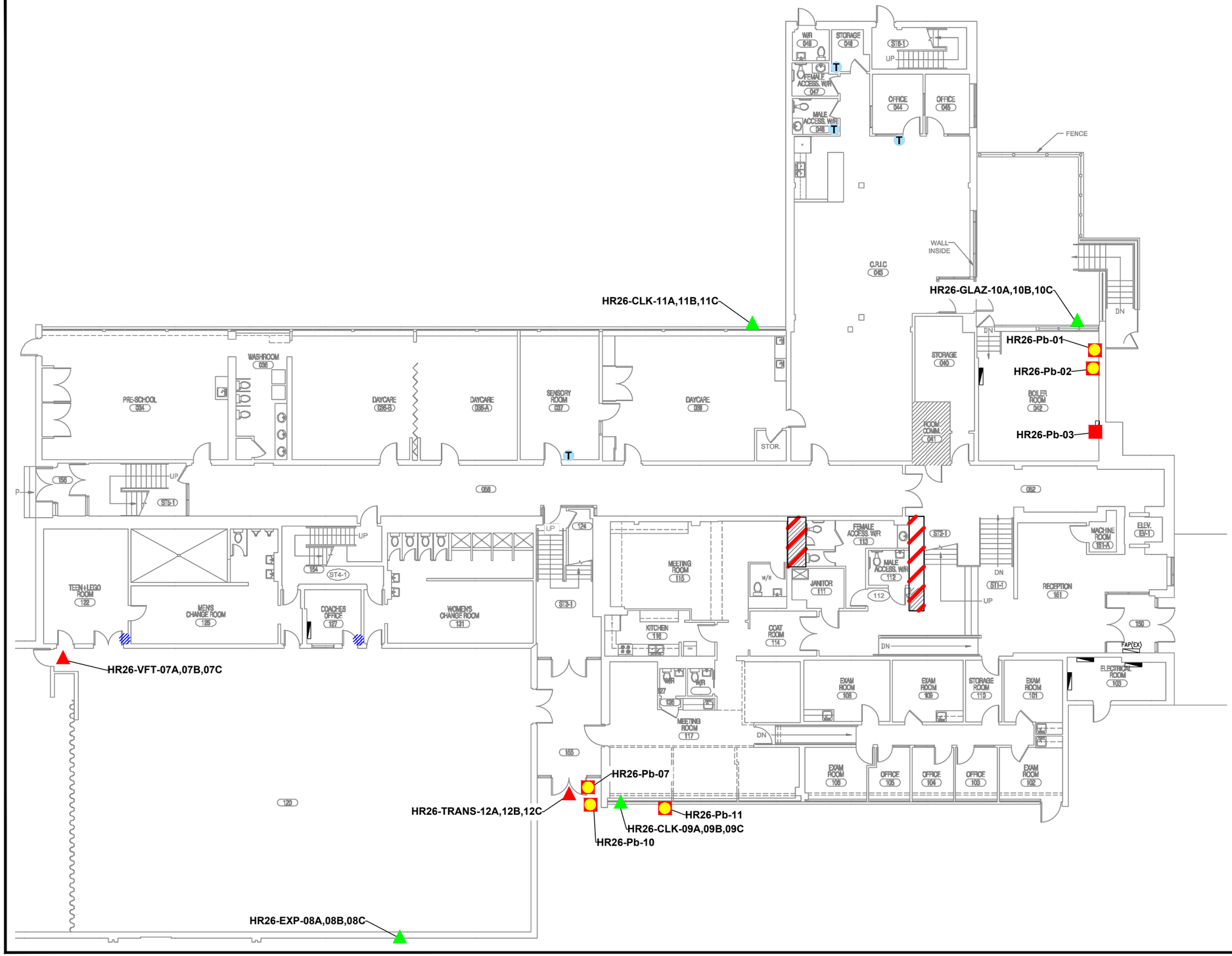
Soil results are reported on a dry weight basis unlesss otherwise noted.

Where %Solids is reported, moisture loss includes the loss of volatile hydrocarbons.

Any use of these results implies your agreement that our total liabilty in connection with this work, however arising, shall be limited to the amount paid by you for this work, and that our employees or agents shall not under any circumstances be liable to you in connection with this work.

APPENDIX D

Figures



Government of Canada | Gouvernement du Canada

LEVEL OF SECURITY | NIVEAU DE SÉCURITÉ

TO BE REVIEWED | À ÊTRE RÉVISÉ

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LEGEND

- ASBESTOS-CONTAINING SAMPLE LOCATION
- NON-ASBESTOS-CONTAINING SAMPLE LOCATION
- METALS-CONTAINING SAMPLE LOCATION
- NON-METALS-CONTAINING SAMPLE LOCATION
- PCB SAMPLE LOCATION
- T MERCURY CONTAINING THERMOSTAT
- SUSPECTED TRANSITE PIPE
- INACCESSIBLE AREAS

NO.	DATE	REVISION	APPR.
1	2025-05-26	0	S.H.
2			
3			

SCALE | ÉCHELLE: N/A

LOCATION | EMPLACEMENT: **BLDG. HR26, 32 LUNDY'S LANE. KINGSTON, ONTARIO**

PROJECT | PROJET: BUILDING HR26 HVAC UPGRADES AT CFB KINGSTON, ONTARIO

TRADE | MÉTIER: N/A

DATE: 2025-05-26

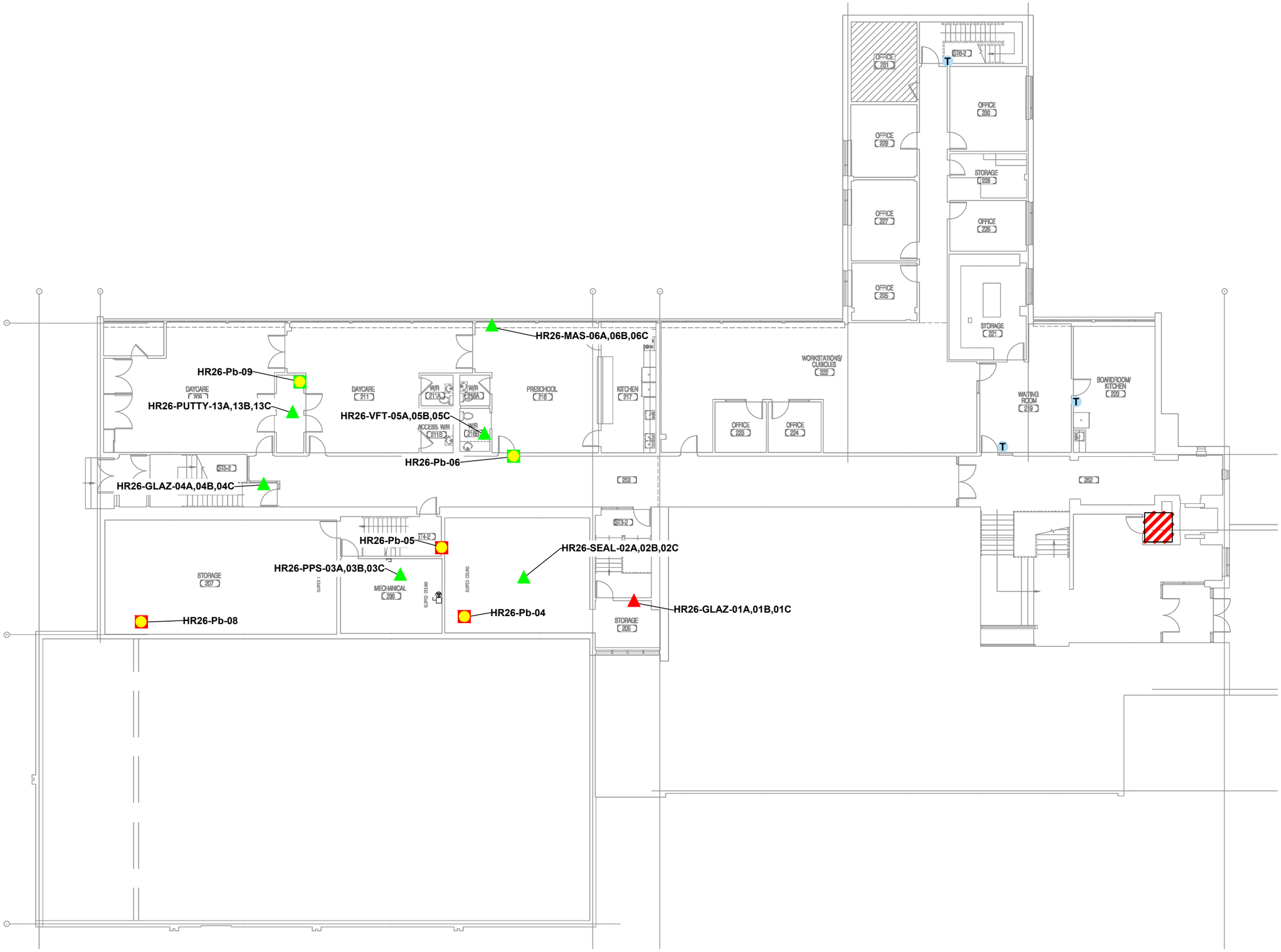
SUBJECT | SUJET: **ASBESTOS, METALS AND PCB SAMPLE LOCATIONS**

GROUND FLOOR AND EXTERIOR

PRODUCTION	REVIEWED | REVU	
DESIGNED | ÉTUDIÉ	CUSTOMER | CLIENT: DCC	DES O | AGENT CONC
DRAWN | DESSINÉ: R. OCKRANT		PROJ MGR | GEST PROJ: S. HEIKKILA
CHECKED | VERIFIÉ: S. HEIKKILA		DES MGR | GEST CONC
COORDINATION		FIRE | INCENDIE

WBS NO. | NO. OTP | PF NO. | NO. DP

DWG. NO. | NO. DESSIN



Government of Canada | Gouvernement du Canada

LEVEL OF SECURITY | NIVEAU DE SÉCURITÉ

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LEGEND

- ASBESTOS-CONTAINING SAMPLE LOCATION
- NON-ASBESTOS-CONTAINING SAMPLE LOCATION
- METALS-CONTAINING SAMPLE LOCATION
- NON-METALS-CONTAINING SAMPLE LOCATION
- PCB SAMPLE LOCATION
- T MERCURY CONTAINING THERMOSTAT
- SUSPECTED TRANSITE PIPE
- INACCESSIBLE AREAS

NO.	DATE	REVISION	APPR.
1	2025-05-26	0	S.H.
2			
3			

SCALE | ÉCHELLE: N/A

LOCATION | EMPLACEMENT: **BLDG. HR26, 32 LUNDY'S LANE. KINGSTON, ONTARIO**

PROJECT | PROJET: BUILDING HR26 HVAC UPGRADES AT CFB KINGSTON, ONTARIO

TRADE | MÉTIER: N/A

DATE: 2025-05-26

SUBJECT | SUJET: **ASBESTOS, METALS AND PCB SAMPLE LOCATIONS**

SECOND FLOOR

PRODUCTION	REVIEWED | REVU	
DESIGNED | ÉTUDIÉ	CUSTOMER | CLIENT: DCC	DES D | AGENT CONC
DRAWN | DESSINÉ: R. OCKRANT		PROJ MGR | GEST PROJ: S. HEIKKILA
CHECKED | VÉRIFIÉ: S. HEIKKILA		DES MGR | GEST CONC
COORDINATION		FIRE | INCENDIE

WBS NO. | NO. OTP | FF NO. | NO. DF

DWG. NO. | NO. DESSIN



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