



**BULLER CRICHTON**  
ENVIRONMENTAL INC.

## Hazardous Materials and Designated Substances Report

Kingston Secondary School  
145 Kirkpatrick St, Kingston, Ontario

**BCE Project:** K26-139  
**Report Issued:** May 25, 2026



***Prepared for:***

Limestone District School Board  
220 Portsmouth Avenue  
Kingston, ON K7M 0G2

***Prepared by:***

Buller Crichton Environmental Inc.  
1000 Gardiners Rd., Suite 203  
Kingston, ON K7P 3C4  
613-729-5291

## Executive Summary

Buller Crichton Environmental Inc. (BCE) was retained by Limestone District School Board (Client) to complete a Hazardous Materials and Designated Substances Survey and Report (DSR) within rooms 141 and 142 of Kingston Secondary School, located at 145 Kirkpatrick St, Kingston, Ontario. The scope of work included the assessment of the interior finishes for the planned lighting upgrades and partial demolition of a concrete block wall, excluding the exterior and roof (herein referred to as the “Project Area”).

The fieldwork was completed on May 4, 2026 by Chris Wright of BCE. The scope of work included an assessment and sampling for eleven (11) provincially regulated designated substances, as defined in Ontario Regulation 490/09: Designated Substances made under the Ontario Occupational Health and Safety Act, R.S.O. 1990 Chapter O.1, (as amended), which included:

- |                 |                       |                  |
|-----------------|-----------------------|------------------|
| • Asbestos      | • Coke Oven Emissions | • Mercury        |
| • Acrylonitrile | • Ethylene Oxide      | • Silica         |
| • Arsenic       | • Isocyanates         | • Vinyl Chloride |
| • Benzene       | • Lead                |                  |

Although not designated substances under O. Reg. 490/09, BCE also reviewed for the presence of additional hazardous building materials, including polychlorinated biphenyls (PCBs) and mould.

This report was prepared for the Client to fulfill the Duty of owner’s requirement under:

- Section 30 (1) of the Ontario Occupational Health and Safety Act, and
- Section 10 of Ontario Regulation 278/05: Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations, as amended (O. Reg. 278/05).

This report must be provided to contractors prior to conducting demolition or renovation work within the defined Project Area. For complete information and findings, as well as the limitations and recommendations, the reader must read the complete report.

---

## Asbestos

---

No bulk samples were collected as part of the assessment, as BCE did not observe any materials suspected to contain asbestos within the Project Area or materials suspected to contain asbestos that are anticipated to be disturbed as part of the proposed scope of work. Asbestos-containing materials have been banned in Canada since the implementation of the prohibition of asbestos and products containing asbestos regulations in 2018. As such, newly installed materials manufactured or supplied after 2018 are generally not expected to contain asbestos.

---

## Lead

---

One (1) paint sample was collected from the Project Area and analyzed for total lead content, reported in micrograms per gram ( $\mu\text{g/g}$ ).

The following paints were identified with insignificant concentrations of lead (i.e.,  $\leq 90 \mu\text{g/g}$ ):

- Grey paint on concrete block walls, Rooms 141 and 142 ( $7 \mu\text{g/g}$ )

In addition, the following materials, should be considered to contain lead:

- Electrical components, including wiring connectors, grounding conductors, and solder
- Within batteries associated with emergency lighting

---

## Mercury

---

No mercury-containing materials were observed within the Project Area.

Light fixtures within the Project Area were LED and are not suspected to contain any mercury.

---

## Silica

---

Suspected silica-containing materials were not physically sampled during the DSR as they are known to be present in ceiling tile, concrete, mortar, masonry, and any other aggregates.

---

## PCBs

---

No PCB containing materials were observed in the Project Area.

Light ballasts within the Project Area were observed to be LED fixtures and are not suspected to contain PCBs.

PCBs were historically used in some electrical equipment and building materials; however, the use of PCB-containing equipment and products has been generally phased out in Canada under the PCB Regulations, which came into force in 2008. As such, newer building materials and equipment installed after this time are generally not expected to contain PCBs.

## **Mould**

---

Suspect mould growth and water-stained ceiling tile was observed in room 141. BCE did not perform intrusive inspections to determine the extent of additional mould growth.

## **Other Designated Substances**

---

No other designated substances, as defined in O. Reg. 490/09 under the OH&S Act, were observed within the Project Area.

Although BCE assessed all physically accessible areas, the possibility still exists that concealed materials may be found during any renovation or demolition process.

In the event any additional suspect designated substances are encountered during renovation or demolition activities, work on those materials must stop immediately and remain undisturbed until testing confirms the presence or absence of asbestos or other designated substances.

---

## Table of Contents

<b>EXECUTIVE SUMMARY .....</b>	<b>i</b>
<b>1 Introduction .....</b>	<b>1</b>
<b>2 Description of Project Area.....</b>	<b>1</b>
<b>3 Scope of Work .....</b>	<b>1</b>
<b>4 Standards, Regulations and Guidelines .....</b>	<b>2</b>
4.1 Designated Substances.....	2
4.1.1 Asbestos.....	2
4.1.2 Lead .....	2
4.1.3 Mercury .....	4
4.1.4 Silica .....	4
4.1.5 PCBs .....	4
4.1.6 Mould .....	4
<b>5 Methodology .....</b>	<b>5</b>
5.1 Designated Substances.....	5
5.1.1 Asbestos.....	5
5.1.2 Lead .....	6
5.1.3 Mercury .....	6
5.1.4 Silica .....	6
5.1.5 PCBs .....	6
5.1.6 Mould .....	7
<b>6 Results and Discussion .....</b>	<b>7</b>
6.1 Designated Substances.....	7
6.1.1 Asbestos-Containing Materials .....	7
6.1.2 Lead-Containing Materials.....	8
6.1.3 Mercury .....	8
6.1.4 Silica .....	8
6.1.5 PCBs .....	8
6.1.6 Mould .....	9
6.1.7 Other Designated Substances.....	9
<b>7 Recommendations .....</b>	<b>9</b>
7.1 General Recommendations.....	9
7.2 Designated Substances.....	9
7.2.1 Lead .....	9

---

7.2.2	Silica .....	10
7.3	Hazardous Materials.....	10
7.3.1	Mould .....	10
7.3.2	Other Designated Substances.....	10
<b>8</b>	<b>Limitations .....</b>	<b>11</b>
<b>9</b>	<b>Closure .....</b>	<b>12</b>

## TABLES

Table 1 - Basic Description of the Project Area .....	1
Table 2 - Material Sampling Requirements .....	5
Table 3 - Results of Bulk Material Lead Analysis.....	8

## APPENDICES

Appendix A: Project Photographs  
Appendix B: Lead Laboratory Results  
Appendix C: Drawing

---

## 1 INTRODUCTION

Buller Crichton Environmental Inc. (BCE) was retained by Limestone District School Board (Client) to complete a Hazardous Materials and Designated Substances Survey and Report (DSR) within rooms 141 and 142 of Kingston Secondary School located at 145 Kirkpatrick St, Kingston, Ontario. The scope of work included the assessment of the interior finishes for the planned lighting upgrades and partial demolition of a concrete block wall, excluding the exterior and roof (herein referred to as the “Project Area”).

## 2 DESCRIPTION OF PROJECT AREA

The following table provides a basic description of the building systems associated with the Project Area:

*Table 1 - Basic Description of the Project Area*

System	Description
2018 Original Construction	
Structure	Structural steel
Exterior Cladding	Outside scope of work
HVAC	Rooftop air handling units
Roof	Outside scope of work
Flooring	Vinyl floor tiles, and rubber
Interior Walls	Concrete block
Ceilings	Acoustic ceiling tiles

## 3 SCOPE OF WORK

BCE’s scope of work was limited to the following:

1. Reviewing the defined Project Area to identify any building materials suspected of containing hazardous materials and designated substances.
2. Collecting samples of accessible building materials that are suspected to contain asbestos, lead and PCBs for laboratory analysis by an independent, third-party accredited laboratory.
3. Providing a comprehensive summary report of hazardous materials and designated substances identified at the defined Project Area with recommendations for removal and/or management as required.

BCE also reviewed the following report provided by the Client prior to completing the field work:

Asbestos Reassessment, Kingston Secondary School, Prepared by Pinchin Ltd, Date: January 8, 2026.

## 4 STANDARDS, REGULATIONS AND GUIDELINES

### 4.1 Designated Substances

Section 30 of the Occupational Health & Safety Act (OH&S Act) requires that a document summarizing the presence of these designated substances must be available to contractors and subcontractors requesting tenders, prior to beginning a construction project (including building renovation or demolition). This report serves that purpose. However, scaled drawings and contract specifications are still required should this job be tendered to multiple contractors.

#### 4.1.1 Asbestos

Ontario Regulation 278/05 – Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations and made under the OH&S Act, outlines specific procedures for identifying asbestos in buildings and on construction sites. In addition, it outlines requirements for their removal and/or re-assessment and management depending on whether any identified materials are to remain in the building. Asbestos-containing materials (ACM) in good condition can remain in the building if it is managed as prescribed in this regulation, including but not limited to implementation of an Asbestos Management Plan (AMP), annual condition assessment, notification to tenants and training for specified workers. However, any ACM must be removed prior to disturbance because of renovations and/or demolition within the defined project area.

R.R.O. 1990, 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 (EPA) sets out requirements for general waste management including ACM. This regulation requires the disposal of asbestos waste in double sealed containers (e.g., a six-mil polyethylene bag or hard plastic barrel), 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.

All asbestos waste must be disposed of as prescribed by Section 17 of O. Reg. 347/90.

#### 4.1.2 Lead

Ontario Regulation 490/09 – *Designated Substances* (O. Reg. 490/09), as amended, regulates lead exposure in the work environment. Apart from construction sites, this regulation is enforceable at all work sites in Ontario. On construction projects, lead is regulated under Ontario Regulation 833 – *Control of Exposure to Biological or Chemical Agents* (O. Reg. 833), as well as the Ministry of Labour, Immigration, Training, and Skills Development (MLTSD) *Guideline – Lead on Construction Projects* (revised April 2011), which is enforceable under Section 25(2)(h) of the Occupational Health & Safety Act (OH&S Act).



The Environmental Abatement Council of Canada (EACC) Lead Guideline for Construction, Renovation, Maintenance or Repair (2025) is intended for the environmental abatement, construction, and painting industries. The guideline establishes clearly defined thresholds to categorize lead concentrations in paints and coatings:

- $\leq 90 \mu\text{g/g}$  (0.009%) – De Minimis (Insignificant Lead): No lead-specific worker protection required.
- 90–1,000  $\mu\text{g/g}$  (0.009–0.1%) – Low-Level Lead: May require control measures depending on work method.
- 1,000–5,000  $\mu\text{g/g}$  (0.1–0.5%) – Lead-Containing: Requires controls as per EACC Work Classifications (Class 1, 2, or 3).
- $\geq 5,000 \mu\text{g/g}$  (0.5%) – Lead-Based: Requires controls as per EACC Work Classifications (Class 1, 2, or 3).

The type and scale of control measures are determined by both the concentration of lead and the type of work activity, which should be assessed using the Ministry of Labour's classification system for lead operations:

- Type 1: Low-risk tasks (e.g., manual removal of small areas of lead-based paint).
- Type 2: Moderate-risk tasks (e.g., power tool use with dust collection systems).
- Type 3: High-risk tasks (e.g., torch cutting or demolition of lead-painted steel structures).

Precautions increase with the task's aggressiveness and potential for airborne exposure. Employers must ensure that appropriate engineering controls, work practices, personal protective equipment (PPE), hygiene facilities, and worker training are in place.

The Occupational Exposure Limit – Time Weighted Average (OEL-TWA) of a worker to lead dust is to be maintained at the lowest practical level with a view to achieving an ambient air concentration lower than  $0.05 \text{ mg/m}^3$ .

Even when lead content is below the de minimis threshold, general health and safety precautions must still be implemented, including but not limited to:

- Prohibiting eating, drinking, smoking, and chewing in the work area;
- Implementing dust suppression techniques;
- Using HEPA-filtered vacuums or wet cleaning methods;
- Providing hand and face washing facilities for workers.

Disposal of lead must be conducted in accordance with the requirements of Reg. 347 General – Waste Management. The regulation details the minimum requirements for the appropriate transport and disposal of wastes, including acceptable Leachate Quality Criteria (Toxicity Characteristic Leaching Procedure – TCLP).

#### **4.1.3 Mercury**

O. Reg. 490/09 as amended regulates mercury exposure in the work environment. Except for construction sites, this regulation is enforceable at all work sites in Ontario. Mercury on construction sites is regulated O. Reg 833.

Disposal of materials containing mercury shall be done in accordance with Reg. 347 General – Waste Management.

#### **4.1.4 Silica**

O. Reg. 490/09, as amended, regulates silica exposure in the work environment. Except for construction sites, this regulation is enforceable at all work sites in Ontario. Exposure to silica on construction sites can happen through the inhalation of dust created from the disturbance of concrete, drywall, ceiling tiles, mortars etc. As a result, airborne exposure to silica on construction sites is regulated through O. Reg 833. In addition, the MLITSD Guideline – Silica on Construction Projects (revised in April 2011) outlines ways to reduce exposure and protect workers on construction sites. This guideline is enforceable through section 25 (2) (h) of the OH&S Act.

#### **4.1.5 PCBs**

PCBs are regulated federally due to their persistence and toxicity. The Canadian Environmental Protection Act, PCB Regulations (SOR/2008-273), establish a concentration threshold of 50 ppm for PCBs in solid materials. Liquid materials containing PCB concentrations of 2 ppm or greater are classified as PCB liquids and must be managed, stored, transported, and disposed of in accordance with federal PCB requirements.

#### **4.1.6 Mould**

Mould growth can result in worker exposures while in the vicinity of the growth and/or during and disturbance of mould impacted materials. The EACC Mould Abatement Guidelines, Edition 3 (2015) outlines the hazards associated with mould exposure and appropriate remediation procedures, personal protective equipment, etc.

## 5 METHODOLOGY

### 5.1 Designated Substances

#### 5.1.1 Asbestos

##### 5.1.1.1 Friability

O. Reg 278/05 requires that ACMs be classified according to their friability. The classification is either designated as friable or non-friable. Friable products are those which can easily be crumbled by hand and release asbestos fibres into the air presenting a risk of inhalation exposure to those around. Non-friable products are not easily crumbled by hand and as a result less likely to release airborne asbestos fibres. However, precautions are important as non-friable ACMs can still release fibres when sanded, cut, abraded, or drilled, especially with power tools.

##### 5.1.1.2 Homogeneous Materials

Homogeneous materials are those that are uniform in colour and texture. Homogeneous materials were assumed to be similar in content. Samples were randomly collected to be representative of each suspect asbestos containing material and then assigned a homogeneous material number accordingly.

##### 5.1.1.3 Sampling and Analysis

Building materials suspected of containing asbestos were sampled in a manner to ensure that adequate sample volume was collected. Locations of materials sampled were documented and an indication of whether the material was friable or not was documented.

The number of samples collected for each suspect material was completed as prescribed by O. Reg. 278/05 and detailed in the table below:

*Table 2 - Material Sampling Requirements*

Type of Material	Size of Area of Homogeneous Material	Minimum # of Samples
Surfacing material, including without limitation material that is applied to surfaces by spraying, by troweling or otherwise. Examples include acoustical plaster on ceilings and fireproofing materials on structural members	Less than 90 m <sup>2</sup> (969 ft <sup>2</sup> )	3
	90 or more m <sup>2</sup> , but less than 450 m <sup>2</sup> (4,844 ft <sup>2</sup> )	5
	450 or more m <sup>2</sup> (more than 4,844 ft <sup>2</sup> )	7
Thermal insulation, except as described below	Any size	3
Thermal insulation patch	Less than 2 linear meters (6.6 ft.) or 0.5 m <sup>2</sup> (approximately 5.4 ft <sup>2</sup> )	1
Any other material	Any size	3

Samples of suspected ACMs were submitted to an independent accredited laboratory Paracel Laboratories of Ottawa, Ontario for asbestos content analysis. Paracel Laboratories is a fully accredited facility for asbestos analysis. Polarized Light Microscopy was completed in accordance with U.S. Environmental Protection Agency (EPA) methodologies and dispersion staining techniques (EPA 600/R-93/116).

Materials are defined as asbestos-containing if they are more than 0.5% asbestos by dry weight. Less than this amount is not considered to be an asbestos-containing material in the province of Ontario.

### **5.1.2 Lead**

Samples of the painted finishes were collected using destructive means (i.e., a razor scraper) to ensure that adequate sample volume was collected. Samples of were submitted to an independent accredited laboratory Paracel Laboratories of Ottawa, Ontario for analysis of lead content using inductively coupled plasma mass spectrometry (ICP-MS). Paracel Laboratories is a fully accredited facility for lead analysis. In addition, any suspected lead products that could not be sampled were visually assessed and documented (e.g., lead in pipe solder, lead in cast-iron pipe fittings and lead in emergency lighting batteries).

### **5.1.3 Mercury**

Mercury was not physically sampled as part of the assessment but was visually assessed and documented where noted. In a building environment, this typically includes mercury vials in older thermostats, mercury vapour in fluorescent light tubes and metal halide lamps. The elemental mercury in the thermostat vials and light tubes presents an occupational exposure risk to workers when the glass is broken and the liquid and/or vapour is released.

### **5.1.4 Silica**

Silica is ubiquitous in our environment and present in numerous building products including, but not limited to, concrete, drywall, plaster, ceiling tiles, and mortar. The silica in these products is confined within the substrate of the material and therefore does not pose a hazard unless released and inhaled by an individual. As a result, it is not possible to sample the silica without causing a significant amount of disturbance. Therefore, BCE visually assessed and documented these materials where noted.

The Occupational Exposure Limit – Time Weighted Average (OEL-TWA) of a worker to silica dust is to be maintained at the lowest practical level with a view to achieving an ambient air concentration lower than 0.10 mg/m<sup>3</sup> of air for quartz and Tripoli, and 0.05 mg/m<sup>3</sup> of air for cristobalite and tridymite.

### **5.1.5 PCBs**

BCE did not collect samples for PCB analysis as part of the assessment. The identification of PCB-containing materials was based on a visual assessment of building components historically associated with PCBs, including electrical equipment, transformers, and capacitors. Materials not confirmed through labeling,

manufacturer documentation, or analytical testing were considered suspect PCB-containing and should be managed accordingly until verified.

#### 5.1.6 Mould

Water damage and potential mould growth were assessed through visual inspection in general accordance with the American Industrial Hygiene Association (AIHA) Field Guide for the Determination of Biological Contaminants in Environmental Samples (2nd Edition). Bulk sampling for mould was not completed as part of this assessment.

## 6 RESULTS AND DISCUSSION

The survey was completed on May 4, 2026, by Chris Wright of BCE. Based on the visual assessment and sampling within the defined Project Area, the following is a summary of the results.

### 6.1 Designated Substances

#### 6.1.1 Asbestos-Containing Materials

No bulk samples were collected as part of the assessment, as BCE did not observe any materials suspected to contain asbestos within the Project Area or materials suspected to contain asbestos that are anticipated to be disturbed as part of the proposed scope of work. Asbestos-containing materials have been banned in Canada since the implementation of the prohibition of asbestos and products containing asbestos regulations in 2018. As such, newly installed materials manufactured or supplied after 2018 are generally not expected to contain asbestos.

The following material were observed within the Project Area but are unlikely to contain asbestos based on material composition and date of installation:

- Spray applied fireproofing on steel beams
- Concrete block mortar and paints
- Vinyl floor tile and mastic
- Baseboard mastic
- Rubber floorings
- Fiberglass insulated pipes and ducts
- 2x4 ceiling tiles, pinholes and fleck – Dated: 2018

Photographs are provided in **Appendix A**.

**Note:** If additional materials suspected to contain designated substances that were not previously visible / uncovered are encountered during the demolition activities that are not included in this report, work must

be stopped, and further investigation be conducted at that time. In the case that suspected ACMs cannot be tested, they must be treated as ACMs until proven otherwise.

### 6.1.2 Lead-Containing Materials

One (1) sample of paint was collected from the Project Area. A summary of the materials analyzed for lead is presented in the following table:

*Table 3 - Results of Bulk Material Lead Analysis*

Sample Reference	Material Description / Location	Results $\mu\text{g/g}$	EACC Lead Classification	Condition
LS1	Grey paint on concrete block walls, Rooms 141 and 142	7	Insignificant	Good

Lead laboratory analytical reports are included within **Appendix C**.

In addition, the following materials, where found, should be considered to contain lead:

- Electrical components, including wiring connectors, grounding conductors, and solder
- Within batteries associated with emergency lighting

### 6.1.3 Mercury

No mercury-containing materials were observed within the Project Area.

Light fixtures within the Project Area were LED and are not suspected to contain any mercury.

### 6.1.4 Silica

Silica was not physically sampled during the assessment as it would cause damage to the building material. Silica is presumed to be present in the ceiling tiles, concrete, cement block, masonry, mortar, stone, and other such aggregates used as construction material present within the Project Area.

### 6.1.5 PCBs

No PCB containing materials were observed in the Project Area.

Light ballasts within the Project Area were observed to be LED fixtures and are not suspected to contain PCBs.

PCBs were historically used in some electrical equipment and building materials; however, the use of PCB-containing equipment and products has been generally phased out in Canada under the PCB Regulations, which came into force in 2008. As such, newer building materials and equipment installed after this time are generally not expected to contain PCBs.

### 6.1.6 Mould

Approximately 2 square feet of suspect mould growth and associated water staining was observed on a ceiling tile within Room 141.

BCE did not conduct a mould assessment to delineate the extent of any concealed mould within the Project Area. This assessment was limited to visible conditions only, the extent of hidden mould behind finishes or within concealed building assemblies could not be determined.

### 6.1.7 Other Designated Substances

No other designated substances, as defined in O. Reg. 490/09 under the OH&S Act, were observed within the defined Project Area.

## 7 RECOMMENDATIONS

### 7.1 General Recommendations

Based on the findings, the *general recommendations* are:

1. This report must be provided to contractors prior to conducting demolition or renovation work within the defined Project Area. A copy of the survey must be immediately available whenever workers are present. Further, contractors shall have an exposure control plan in place for each designated substance identified in this report as being in way of the planned work.
2. Work must STOP if additional suspect materials are encountered during renovations and/or demolition activities. These suspect materials must be left undisturbed until testing determines the presence or absence of asbestos or other hazardous materials. In addition, work must also STOP in the event these suspect materials are disturbed inadvertently.

Based on the findings, the *designated substance specific recommendations* are:

### 7.2 Designated Substances

#### 7.2.1 Lead

Lead is presumed to be present in materials not analyzed, including solder, grounding conductors, electrical connectors and batteries associated with emergency lighting. These materials must be treated as lead-containing unless confirmed otherwise by laboratory analysis. Where any confirmed or presumed lead-containing material is to be disturbed, the following requirements apply:

- A task-specific risk assessment must be completed prior to any disturbance to determine required controls. Different precautions apply depending on whether the work involves hand tools, power tools, or demolition.

- The Contractor is responsible for determining task-specific protective measures and environmental controls based on their own risk assessment.

### 7.2.2 Silica

Silica is expected to be present in concrete and other aggregates (e.g. ceiling tile, masonry, stone, and any other aggregates) within the Project Area. Silica may become airborne during disturbance activities such as breaking, cutting, grinding, or demolition of these materials. All work disturbing silica-containing materials must follow the requirements of the MLTSD *Silica on Construction Projects* Guideline (2011), including:

- Use of wet methods to control dust at the source.
- Use of HEPA-filtered dust collection equipment where applicable.
- Respiratory protection with P100 HEPA filters, fit-tested to each worker.
- Isolation of the work area and appropriate warning signage.
- No dry sweeping or use of compressed air – cleanup must use wet methods or HEPA vacuums.
- Worker training on silica hazards and safe work procedures.
- Hygiene facilities for workers to wash hands and face prior to leaving the work area.

## 7.3 Hazardous Materials

Based on the findings, the *hazardous material recommendations* are:

### 7.3.1 Mould

Suspected mould growth and water staining was observed on approximately 2 square feet of ceiling tile within room 141 in the Project Area. BCE did not delineate the full extent of mould growth and did not perform intrusive inspection to determine whether concealed suspect mould may be present within adjacent building assemblies. Once the full extent of suspect mould growth and water-staining is established, the affected areas should be cleaned and remediated in accordance with recognized mould remediation guidelines, such as the Environmental Abatement Council of Canada (EACC) Mould Abatement Guidelines.

### 7.3.2 Other Designated Substances

The following Designated Substances do not require any action and are not addressed in this section:

- Acrylonitrile
- Arsenic
- Benzene
- Coke Oven Emissions
- Ethylene Oxide
- Isocyanates
- Vinyl Chloride



## 8 LIMITATIONS

This report was prepared for the exclusive use of the Client. This report is based on data and information collected during the assessment work conducted May 4, 2026, by BCE Inc. as described in this report.

The conclusions and recommendations contained in this report are based upon professional opinions regarding 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 BCE 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.
- Additional Designated Substances not identified in this report may become evident during demolition activities. Should additional information become available, BCE requests that this information be brought to our attention so that we may re-assess the conclusions presented herein. All quantities contained in this report are approximate and based on visual observations made in accessible areas.
- Although effort was made to expose and sample potential designated substances, there is a possibility that additional concealed substances/materials may be present beneath existing flooring, behind wall cavities, roof systems, above ceilings, and any other inaccessible areas such as pipe chases within the project area.
- Should further designated substances be encountered during any renovation or demolition activities, those materials must be managed in accordance with applicable regulations.

## 9 CLOSURE

If you have any questions or require any further information, please feel free to contact the undersigned at 613-804-5411. Thank you for the opportunity to be of service. We look forward to working with you again.

Best Regards,

**BULLER CRICHTON ENVIRONMENTAL INC.**

*Prepared by:*



Chris Wright, Dipl.Tech, WRT  
Project Manager/Consultant

*Reviewed by:*



Chris Mahoney  
Director of Strategic Growth

## Appendix A: Project Photographs

---


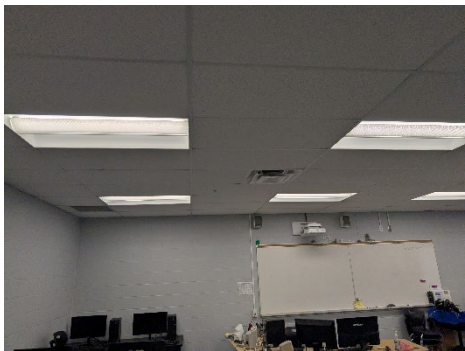

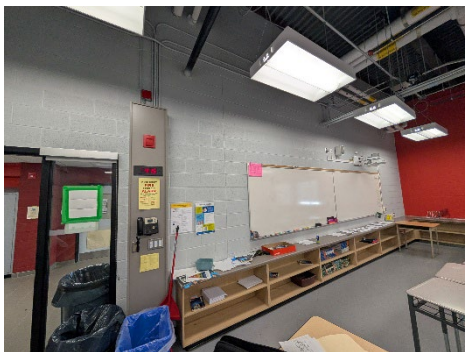
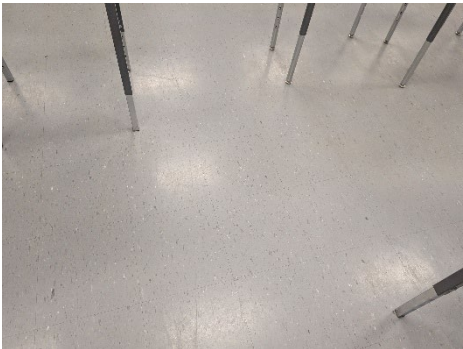
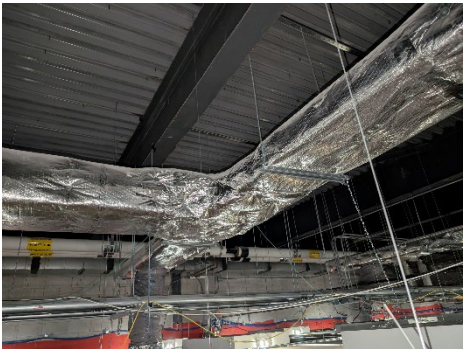


Photo #	Photographs	Material Location / Description
1		Rubber flooring within the Project Areas is unlikely to contain asbestos base on date of installation.
2		Ceiling tiles within the Project Area are unlikely to contain asbestos base on date of installation.
3		Spray applied fireproofing on steel beams within the Project Areas is unlikely to contain asbestos base on date of installation.
4		<p>Paint and mortar on concrete block walls within the Project Area are unlikely to contain asbestos base on date of installation.</p> <p>Insignificant concentration of lead in grey paint on concrete block walls (LS1)</p>

Photo #	Photographs	Material Location / Description
5		Vinyl floor tiles and mastic within the Project Area are unlikely to contain asbestos base on date of installation.
6		View of fiberglass insulated ducts and piping unlikely to contain asbestos base on material composition.
7		View of suspect mould growth and water-staining on a ceiling tile within room 141.
6		View of LED light fixture within the Project Area unlikely to contain mercury or PCBs.

## Appendix B: Lead Laboratory Results

---

## Certificate of Analysis

**Buller Crichton Environmental Inc. (Kingston)**

1000 Gardiners Road, Suite 203

Kingston, ON K7P 3C4

Attn: Chris Wright

Client PO: K26-139

Project: K26-139

Custody:

Report Date: 15-May-2026

Order Date: 11-May-2026

**Order #: 2620114**

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

**Paracel ID**

2620114-01

**Client ID**

LS1 - Grey paint, Concrete block, loc 141, 142

Approved By:

Adriana Tirca, B.Eng (Chem)  
Supervisor

Any use of these results implies your agreement that our total liability 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 circumstances be liable to you in connection with this work

Certificate of Analysis

Report Date: 15-May-2026

Client: Buller Crichton Environmental Inc. (Kingston)

Order Date: 11-May-2026

Client PO: K26-139

Project Description: K26-139

**Analysis Summary Table**

Analysis	Method Reference/Description	Lab Location	Extraction Date	Analysis Date
Metals, ICP-MS	EPA 6020 - Digestion - ICP-MS	Ottawa	14-May-26	15-May-26

**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:****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.



Certificate of Analysis

Report Date: 15-May-2026

Client: Buller Crichton Environmental Inc. (Kingston)

Order Date: 11-May-2026

Client PO: K26-139

Project Description: K26-139

## Sample Results

Lead					Matrix: Paint
Parcel ID	Client ID	Sample Date	Units	MDL	Result
2620114-01	LS1 - Grey paint, Concrete block, loc 141, 142	4-May-26	ug/g	5	7 [1]

## Laboratory Internal QA/QC

Analyte	Result	Reporting Limit	Units	Source Result	%REC	%REC Limit	RPD	RPD Limit	Notes
<b>Matrix Blank</b>									
Lead	ND	5	ug/g						
<b>Matrix Duplicate</b>									
Lead	ND	5	ug/g	ND			NC	50	
<b>Matrix Spike</b>									
Lead	48.7	5.00	ug/g	ND	97.1	70-130			

## Appendix C: Drawing



**LEGEND**

◆ LEAD BULK SAMPLE

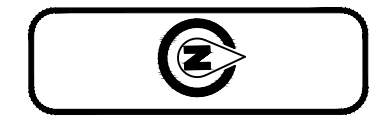
— SURVEY AREA

— OUTSIDE SURVEY SCOPE

NOT ALL KNOWN OR SUSPECTED HAZARDOUS BUILDING MATERIALS MAY BE DEPICTED ON THE DRAWING. REFER TO THE HAZARDOUS MATERIALS AND DESIGNATED SUBSTANCES REPORT FOR A COMPLETE LIST OF KNOWN AND SUSPECTED HAZARDOUS BUILDING MATERIALS.

LEGEND IS COLOUR DEPENDENT. NON-COLOUR COPIES MAY ALTER INTERPRETATION.

BASE PLAN PROVIDED BY CLIENT.



CLIENT NAME:  
LDSB

PROJECT NAME:  
HAZARDOUS MATERIALS  
& DESIGNATED SUBSTANCES  
ASSESSMENT

BUILDING ADDRESS:  
KSS  
145 KIRKPATRICK  
KINGSTON, ONTARIO

FIGURE NAME:  
FIRST FLOOR

BCE Project K26-139	Sheet  1 OF 1
Date MAY 2026	
Scale NOT TO SCALE	
DRAWN BY: CW	