

DLS GROUP

RESTORING THE ENVIRONMENT FOR FUTURE GENERATIONS
TOLL FREE EMERGENCY SPILL LINE: 1-866-287-7455



March 24, 2014

Bob Munshaw
Greenbank Airport
1140 Highway 47 East
Uxbridge, ON L9P 1R3

Dear Mr. Munshaw,

**Re: Fill Quality Control Procedures, Greenbank Airport
Lot 12, Concession 9, Township of Scugog, ON (“the Site”)**

INTRODUCTION

The following document describes soil quality control protocols at the Greenbank Airport located at Lot 12, Concession 9, Township of Scugog, Ontario. These protocols are administered and enforced by D.L. Services Inc. (“DLS”) on behalf of its client, the Greenbank Airport.

PURPOSE

The purpose of this protocol is to prevent the placement of soils with unacceptable levels of contamination. For the objective of this document, soil is defined as it is in Ontario Regulation 153/04, namely:

“unconsolidated naturally occurring mineral particles and other naturally occurring material resulting from the natural breakdown of rock or organic matter by physical, chemical or biological processes that are smaller than 2 millimeters in size or that pass the US #10 sieve”.

SOURCE SITE APPROVAL PROTOCOLS

Care needs to be taken to delineate and distinguish fill quality at every source property to ensure acceptable soils only are received at the Site. The most imperative level of quality control occurs at the source.

The Site receives remediated soil from the GFL Environmental soil recycling facility and fill materials from customers throughout the Greater Toronto Area, Peel and Durham Regions, primarily construction sites where there is a soil excess from excavations.

Before accepting any soil from a GFL Environmental soil recycling facility:

- a) DLS will review and approve the movement of soil from treated cells prior to shipment to the Site. For each treated cell, GFL will provide laboratory analytical data and an estimate volume of each treated cell that is ready for shipment to the Site;
- b) A tracking system is implemented by GFL to distinguish the movement of soil from each approved cell. This necessitates a bill of lading that is linked to GFL soil refuse and destination form. The treated cell name will be written on the bill of lading to track origin of soil being received.

Before accepting any soil from a source other than the GFL Environmental soil recycling facility, DLS must receive:

- (a) All documentation regarding the environmental conditions of the source property, including Environmental Site Assessment (“ESA”) reports, and/or remediation reports. The documentation must be signed by a qualified person (“QP”);
- (b) If the assessment reports indicate that contaminated soil is present at the source property, the documentation should be accompanied by a Soil Management Plan (“SMP”) that will be utilized to ensure that soil transported to the Site meets the Table 2 Industrial/Commercial Site Conditions Standards. The SMP will include:
 - (i) A Site plan which identifies all areas to be excavated with the estimated volume and chemical composition of each area, along with detailed instructions to on-site contractors identifying the depth of soil to be excavated for off-site management;

- (ii) Appropriate characterization of all excavated soil by a QP, or a person under the supervision of a QP, to determine the volume and chemical composition of the soil that is to be managed off-site;
- (iii) Appropriate sampling and laboratory testing to ensure that all chemical parameters in the soil are characterized;
- (iv) Documentation signed by a QP with appropriate and representative soil analysis, confirming the quality of fill meets the soil site condition standards for an industrial/commercial land use and medium and fine textured soils in Table 2 of the Soil, Ground Water and Sediment Standards for Use Under Part XV.1 of the *Environmental Protection Act*, dated April 15, 2011 (the "Site Condition Standards")¹.

The environmental documentation is reviewed by a QP at DLS. The QP determines whether soil from the source site is acceptable for use as fill at the Site and whether the documentation provided is adequate to ensure that soil transported to the Site meets the Table 2 Standards. In the event that a source site contains contaminated soil that must be removed to an appropriately approved facility (other than the Greenbank Airport), DLS requires a clearance letter from a QP confirming that all of the contaminated material has been removed from the source property. The clearance letter is reviewed by facility's QP who then determines if the remaining soil is suitable for placement at the Site.

If the fill is acceptable, a customer is permitted to purchase fill tickets from Greenbank Airport, which are colour-coded by customer for tracking purposes. The number of tickets issued is based upon the customer's estimates of the volume of fill to be generated by the source property.

Following confirmation that the quality of fill from the source property is acceptable for placement at the Site, DLS will post all sample analysis reports on the internet at www.greenbankairways.net. The Soil Analysis Reports will show that the source site sampling meets Table 2 Standards for Industrial/Commercial/Community and that the soil is of a quality that meets the appropriate protocols for Greenbank Airways Fill Site. The web page will be available to the public for review.

¹With the exception of the surrogate parameters Electrical Conductivity (EC) and Sodium Adsorption Ratio (SAR), where soil condition standards are established solely on the basis of potential impacts on plants and soil invertebrates. If the measurement of EC is greater than 1.4 mS/cm and/or the SAR exceeds 12, the soil will only be accepted at the Site on the basis that it will be placed at least 1.5 metres below finished grade.

Every customer is made aware that any fill that is contaminated or that contains demolition materials or other waste materials will not be accepted at the Site and will be returned to them or disposed of properly at their cost.

ON-SITE FILL RECEIVING PROCEDURES

DLS has a QP and/or a competent representative at the facility at any time that the Site is open for receipt of fill. The QP is responsible for monitoring the quality of incoming fill received by the Site.

Trucks transporting fill material enter the Site from County Road 47. Each source site has different coloured fill tickets. A fill ticket must be produced to Greenbank Airways gate staff before the truck leaves the filling area. Gate staff check to ensure that the color coded fill ticket is valid. Gate staff will produce all fill tickets to Greenbank Airways administration staff for record-keeping purposes. Each bill of lading originating from a GFL soil recycling facility will clearly show which cell and pad the soil originated from. Administration staff are to keep the following documentation for the tracking of all incoming loads of soil:

- (a) Name and location of the source site. For all GFL accepted soils, the cell name will be attached to each load;
- (b) Date of arrival of each load to the site;
- (c) Truck number of each Truck that delivers fill is recorded on each fill ticket
- (d) Volume of soil received from each treated cell or source property;
- (e) Confirmation by the DLS QP acknowledging that the soil is acceptable for receipt at the site;
- (f) Rejections of any loads of soil due to visual inspection or review of analytical results

Incoming loads of fill are monitored by the facility QP or their representative as it is dumped at the receiving area to verify that no unacceptable materials are included in the load. Incoming loads are visually inspected and screened for odours, staining or debris. The daily shipments are then checked against approved source properties or approved cells from GFL.

Fill that is observed to contain unacceptable materials is returned to the customer. The fill ticket is forfeited in these circumstances. Staff at the receiving area contacts the Greenbank Airport administration staff, who then record the rejected load. If the truck has already left the Site, fill may be reloaded on the next truck from that customer or segregated and stockpiled for return to the source property.

The QP (or their representative) collects a minimum of one audit sample per month of soil received from each approved source property. The GFL Soil Treatment Facility will require additional sampling if more than 1 source cell is transported to site within each month.

Depending on the source site conditions and field observations, additional or more frequent sampling may be required for each source property. In the event that analytical results from any audit sample indicate a concentration greater than the Site Condition Standards, DLS will immediately notify its client of the findings and provide recommendations for mitigation.

As part of a Ph.D. research study, additional audit samples are collected for analysis at the receiving Site and/or the source properties. All findings will be presented by research team at the end of study.

CLOSURE

We trust that the above information is sufficient for your present requirements. Please do not hesitate to contact the undersigned if you have any questions or concerns.

Yours truly,

D.L. SERVICES INC.

Scott Pitsch, P.Geo-Limited, QP
Operations Manager