

DLS GROUP

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



July 19, 2012

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

Dear Mr. Munshaw,

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

INTRODUCTION

This document describes fill quality control procedures at the Greenbank Airport located at Lot 12, Concession 9, Township of Scugog, Ontario. These procedures are administered and enforced by D.L. Services Inc. ("DLS") on behalf of its client, the Greenbank Airport.

OBJECTIVE

The objective of these procedures is to prevent the placement of soils with unacceptable levels of contamination. For the purpose 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 millimetres in size or that pass the US #10 sieve”.

SOURCE SITE PROCEDURES

As historic land use practices at any site may have the potential to leave a legacy of soil contamination, care needs to be taken to appropriately delineate and characterize fill quality at every source site. As a result, the first and most critical level of quality control occurs at the source site.

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

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 all Phase I and/or II Environmental Site Assessment (“ESA”) reports, and/or remediation reports. The documentation must be signed by a qualified person (“QP”);
- (b) A Soil Management Plan (“SMP”) for the source site 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 and SMP 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 soil management plan 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.

Following confirmation that the quality of fill from a source property is acceptable for placement at the Site, DLS will post a Soil Report on the internet at www.greenbankairways.net. The Soil Report will certify that the source site information has been reviewed and that the soil is of a quality that meets the appropriate Standards. The web page will be available to the public for review.

Remediated soil received from the GFL Environmental soil recycling facility in Pickering is subject to a rigorous testing protocol under Provisional Certificate of Approval No. A680301 issued by the Ministry of the Environment. Test results are reviewed by DLS to confirm that remediated soil meets the Site Condition Standards before it is transported to the Site.

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.

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 and supporting documentation provided by the customer.

¹ With 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.

SITE ACCEPTANCE 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 the quality of incoming fill received by the Site.

Trucks transporting fill material enter the site from County Road 47. A fill ticket must be produced at the gate before the truck may proceed to the filling area. Gate staff checks to ensure that the fill ticket is valid and record the vehicle number and licence plate number. The truck licence number is written on the fill ticket for record-keeping purposes. A portion of the ticket is returned to the driver. Gate staff keeps the following documentation for the tracking of all incoming loads of soil:

- (a) Name and Location of the source site;
- (b) Date and time of arrival of each load to the site;
- (c) Vehicle license number for each load to the site;
- (d) Volume of soil received from each source property;
- (e) Quantity of excess soil received;
- (f) Analytical records from the Source site signed by a QP;
- (g) Written confirmation by the facility QP acknowledging that the soil is acceptable for receipt at the site;
- (h) Rejections of any loads of soil due to visual inspection or review of analytical results

Each incoming load of fill is visually monitored by the facility QP or their representative before and as it is dumped at the filling area to verify that no unacceptable materials are included in the load. All incoming loads are visually inspected to screen for odours, staining or debris. The vehicle number and licence plate number are recorded. At the end of each day, that information is cross-referenced with the information collected at the gate. The daily shipments are then checked against approved source sites.

Any load that is observed to contain any significant amount of unacceptable materials is returned to the customer, even if it requires re-loading. The fill ticket is forfeited in these circumstances. Staff at the filling area contact staff at the gate, who record the rejected load. If the truck has already left the site, fill may be reloaded on the next truck from that customer.

Any unacceptable materials discovered in the course of spreading fill are segregated in bins for appropriate disposal off-site.

The QP (or their representative) collects a minimum of one audit sample per month of soil received from each source property, including the GFL soil treatment facility. Depending on the source site conditions and field observations, additional or more frequent sampling may be required. In the event that the 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.

Fill from each source site is deposited in a separate area of the filling area and remains segregated from fill originating at other source sites until the audit sample from the source site confirms that the fill material deposited in the period in which the sample was taken meets the Site Condition Standards.

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