Director's Order

Director's Order Number

1-280716025

Director's Order Issued To

PARKER'S CLEANERS (BURLINGTON) LTD
3040 New Street, Burlington, Ontario, L7N 1M5

JOHN KALANDA LIMITED
30 Geraldine Court, Don Mills, Ontario, M3A 1M9

BRIAN KALANDA
30 Geraldine Court, Don Mills, Ontario, M3A 1M9

JOHN KALANDA
2167 Mystic Crt, Burlington, Ontario, L7M 3J7

ROSS KALANDA
135 Glenariff Drive, Freelton, Ontario, L8B 1A5

THE ESTATE OF JAMES PARKER
c/o Christine Corlett
1339 Saginaw Crescent, Mississauga, L5H 1X4

DION WALTON
3040 New Street, Burlington, Ontario, L7N 1M5

THE ESTATE OF LEW HOLUBEK
c/o Douglas Lundy & Mary Lou Luross
PO Box 10004, RPO Meadowlands Mall, Ancaster, ON L9K 1P2
574 Barons Court, Burlington, Ontario, L7R 4E4

GERRY STRONGMAN HOLDINGS LTD.
1885 Marine Drive, North Vancouver, B.C. V7P 1V5

THE CORPORATION OF THE CITY OF BURLINGTON
426 Brant Street, Burlington, Ontario, L7R 3Z6

MARANDO COURT APARTMENTS (BUILDING NO. 1) LIMITED
2418 New Street, Burlington, Ontario, L7R 1J6

MARANDO COURT APARTMENTS (BUILDING NO. 6) LIMITED
2420 New Street, Unit 2, Burlington, Ontario, L7R 1J6

MARANDO COURT APARTMENTS (BUILDING NO. 5) LIMITED
2422 New Street, Box 16, Burlington, Ontario, L7R 1J6

8037043 CANADA INC.
12 Barn Swallow Court, Richmond Hill, Ontario, L4E 0K1

PARIS ROAD PLAZA INC.
1901 Fieldgate Drive, Burlington, ON, L7P 3H4

AB HOLDINGS INC.
3432 Mikalda Road, Burlington, Ontario, L7M 0J9

CHILDREN'S FINANCIAL GROUP INC.
3221 North Service Road, Burlington, Ontario, L7N 3G2

Site

480 GUELPH LINE, BURLINGTON, ON, L7R 3L9

AND OTHER PROPERTIES WITHIN THE STUDY AREA

Refer to the Definitions section in Part B of this Director's Order, for the meaning of all the capitalized terms that are used in this Director's Order.

PART A - WORK ORDERED

This work is ordered pursuant to my authority under **EPA | 18 | (1), EPA | 197 | (1)**, I order you, jointly and severally, unless otherwise indicated, to do the following:

Item No. 1

By September 8, 2026, the Orderees shall retain the services of one or more Qualified Person(s) to carry out the work required of them in the items below.

Item No. 2

By September 8, 2026, the Orderees shall submit to the Director written confirmation from their retained Qualified Person(s) by email to Neil. Hannington@ontario.ca and to environment.haltonpeel@ontario.ca that they have (1) received a copy of the Order; (2) been retained to carry out the work as described in the work ordered items which apply to that Orderee and (3) the experience and qualifications to carry out such work.

Item No. 3

By January 11, 2027, the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, a Contaminant Management Plan for 480 Guelph Line, Burlington.

Item No. 4

Upon service of the Order and within 15 days of receiving a request by any other Orderee or any Qualified Person retained on their behalf, an Orderee shall provide environmental site information pertaining to PCE contamination on or under a property they own, or a property under their management or control, within the Study Area that was created prior to the date the Order is served or created further to the requirements of the Order, excluding indoor air quality information.

Item No. 5

By February 8, 2027, the 2021 Orderees shall have a Qualified Person prepare and submit to the Director Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca a written report prepared in accordance with the Financial Assurance Guideline which summarizes the estimated total costs to complete the work described within all Delineation Work Plans, Contaminant Management Plans and Indoor Air Quality Sampling Plans

required by this Order. When calculating the total costs for the Downgradient properties identified in the Study Area, the 2021 Orderees shall consider the amounts identified in the cost reports submitted by the other Orderees that own those properties, where available.

Item No. 6

By January 11, 2027, the trustees of the estate of Lew Holubek and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, the following for the property at 470 Guelph Line, Burlington:

a) a Contaminant Management Plan, and

b) a report detailing the estimated costs to complete the work described in the Contaminant Management Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 6 shall also provide a copy of the documents required by parts a) and b) to all parties listed as Orderees for Item No. 6.

Item No. 7

By January 11, 2027, Gerry Strongman Holdings Ltd. and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, the following for the property at 466 Guelph Line, Burlington:

a) a Contaminant Management Plan, and

b) a report detailing the estimated costs to complete the work described in the Contaminant Management Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 7 shall also provide a copy of the documents required by parts a) and b) to all parties listed as Orderees for Item No. 7.

Item No. 8

By January 11, 2027, Marando Court Apartments (Building No. 1) Limited and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil.Hannington@ontario.ca and to environment. haltonpeel@ontario.ca, the following for the property described as property identifier number (PIN) 07197- 0091, located at 2418 New Street, Burlington:
a) a Delineation Work Plan,
b) an Indoor Air Quality Sampling Plan,
c) a report detailing the estimated costs to complete the work described in the Delineation Work Plan, and
d) a report detailing the estimated costs to complete the work described in the Indoor Air Quality Sampling Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 8 shall also provide a copy of the documents required by parts a), b), c) and d) to all parties listed as Orderees for Item No. 8.

Item No. 9

By January 11, 2027, Marando Court Apartments (Building No. 6) Limited and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, the following for the property described as PIN 07197-0097, located at 2420 New Street, Burlington:
a) a Delineation Work Plan
b) an Indoor Air Quality Sampling Plan,
c) a report detailing the estimated costs to complete the work described in the Delineation Work Plan, and
d) a report detailing the estimated costs to complete the work described in the Indoor Air Quality Sampling Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 9 shall also provide a copy of the documents required by parts a), b), c) and d) to all parties listed as Orderees for Item No. 9.

Item No. 10

By January 11, 2027, Marando Court Apartments (Building No. 5) Limited and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, the following for the property described as PIN 07197-0099, located at 2422 New Street, Burlington:
a) a Delineation Work Plan,
b) an Indoor Air Quality Sampling Plan,
c) a report detailing the estimated costs to complete the work described in the Delineation Work Plan, and
d) a report detailing the estimated costs to complete the work described in the Indoor Air Quality Sampling Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 10 shall also provide a copy of the documents required by parts a), b), c) and d) to all parties listed as Orderees for Item No. 10.

Item No. 11

By January 11, 2027, Marando Court Apartments (Building No.1) Limited, Marando Court Apartments (Building No. 5) Limited, Marando Court Apartments (Building No. 6) Limited and 8037043 Canada Inc., and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, the following for the property described as PIN 07197-0092, located at 2424 New Street, Burlington:
a) a Delineation Work Plan, and
b) a report detailing the estimated costs to complete the work described in the Delineation Work Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 11 shall also provide a copy of the documents required by parts a) and b) to all parties listed as Orderees for Item No. 11.

Item No. 12

By January 11, 2027, 8037043 Canada Inc., and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil. Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, the following for the property described as PIN 07197-0100, located at 2424 New Street, Burlington:
a) a Delineation Work Plan,
b) an Indoor Air Quality Sampling Plan,
c) a report detailing the estimated costs to complete the work described in the Delineation Work Plan, and
d) a report detailing the estimated costs to complete the work described in the Indoor Air Quality Sampling Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 12 shall also provide a copy of the documents required by parts a), b), c) and d) to all parties listed as Orderees for Item No. 12.

Item No. 13

By January 11, 2027, Paris Road Plaza Inc. and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil. Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, the following for the property at 2440 New Street, Burlington:
a) a Delineation Work Plan,
b) an Indoor Air Quality Sampling Plan,
c) a report detailing the estimated costs to complete the work described in the Delineation Work Plan, and
d) a report detailing the estimated costs to complete the work described in the Indoor Air Quality Sampling Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 13 shall also provide a copy of the documents required by parts a), b), c) and d) to all parties listed as Orderees for Item No. 13.

Item No. 14

By January 11, 2027, AB Holdings Inc. and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil. Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, for the property at 406 Guelph Line, Burlington:

a) a Delineation Work Plan,
b) an Indoor Air Quality Sampling Plan,
c) a report detailing the estimated costs to complete the work described in the Delineation Work Plan, and
d) a report detailing the estimated costs to complete the work described in the Indoor Air Quality Sampling Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 14 shall also provide a copy of the documents required by parts a), b), c) and d) to all parties listed as Orderees for Item No. 14.

Item No. 15

By January 11, 2027, Children's Financial Group Inc. and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil. Hannington@ontario.ca and to environment.haltonpeel@ontario.ca, for the property at 390 Guelph Line, Burlington:
a) a Delineation Work Plan,
b) an Indoor Air Quality Sampling Plan,
c) a report detailing the estimated costs to complete the work described in the Delineation Work Plan, and
d) a report detailing the estimated costs to complete the work described in the Indoor Air Quality Sampling Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 15 shall also provide a copy of the documents required by parts a), b), c) and d) to all parties listed as Orderees for Item No. 15.

Item No. 16

By January 11, 2027, The Corporation of the City of Burlington and the 2021 Orderees shall have a Qualified Person prepare and submit to the Director by email at Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca the following for the Guelph Line Right of Way (between 480 Guelph Line and 390 Guelph Line), New Street Right of Way (between Beverley Drive and Guelph Line) and the Waterfront Trail (between Ward Road and Guelph Line):
a) a Delineation Work Plan including an assessment of Preferential Pathways, and
b) a report detailing the estimated costs to complete the work described in the Delineation Work Plan.

In addition, at the same time that the above-noted documents are to be provided to the Director, the Orderees for Item No. 16 shall also provide a copy of the documents required by parts a) and b) to all parties listed as Orderees for Item No. 16.

Item No. 17

Upon service of this Order, the Orderees shall notify all tenants of a property in the Study Area owned by, or under the management or control of, the Orderee, and any persons planning to undertake any intrusive work on such property, of the requirements of this Order, and provide a copy of the Order upon request.

Item No. 18

Upon service of this Order, the Orderees and any other person with an interest in their property shall, before dealing in any way with the property that they own as part of the Study Area, give a copy of this Order, including any amendments thereto, to every person who will acquire an interest in the property as a result of the dealing.

Item No. 19

By August 05, 2026, Gerry Strongman Holdings Ltd. and the Estate of Lew Holubek (c/o the estate trustees) shall submit to the Director by email to Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca an acknowledgement and direction package completed for PIN 07068-0210 and PIN 07068-0211, respectively, as described in accordance with the instructions set out in the package provided by the Director.

Item No. 20

Within 30 days of receipt of an acknowledgment and direction package signed by the Director, Gerry Strongman Holdings Ltd. and the Estate of Lew Holubek (c/o the estate trustees) shall register the certificate of requirement issued under s. 197 (2) of the EPA, on title for PIN 07068-0210 and PIN 07068-0211, respectively, in the appropriate land registry office.

Item No. 21

Within 30 days of registering the certificate of requirement on title, Gerry Strongman Holdings Ltd. and the Estate of Lew Holubek (c/o the estate trustees) shall submit to the Director by email to Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca written confirmation that the certificate of requirement has been registered on title for PIN 07068-0210 and PIN 07068-0211 respectively, as required by Item No. 20 by providing a copy of the registered document and of the parcel register for the PIN for each respective property.

Item No. 22

Within 90 days of the Director notifying the Orderees in writing that a plan submitted as required by this Order is accepted or such a plan as amended by agreement of the Orderees and the Director is accepted, the Orderees shall submit to the Director written confirmation from their retained Qualified Person(s) by email to Neil.Hannington@ontario.ca and to environment.haltonpeel@ontario.ca that they have been retained to implement the requirements as set out in the accepted plan and that the work has commenced.

PART B – DIRECTOR'S REPORT

This Director's Order is being issued for the reasons set out below.

Definitions

For the purposes of this Director's Order, the following capitalized terms shall have the meanings set out below:

"Director's Order" means this Director's Order Number 1-280716025, as it may be amended.

"2021 Order" means Director' Order No. 4371-AWPL7E-2 issued by the Ministry to the 2021 Orderees on January 22nd, 2021.

"2021 Orderees" means the persons to whom the 2021 Order was issued, namely John Kalanda Limited, Mr. John Martin Kalanda, Mr. Ross Allan Kalanda and Mr. Brian Douglas Kalanda, Mr. James Harold Parker (now deceased and represented by the Estate of James Parker Estate), Parkers Cleaners (Burlington) Ltd. and Mr. Dion Walton.

"Adverse Effect" has the same meaning as in subsection 1(1) of the EPA.

"Contaminant Management Plan" means a plan which details action(s) to be taken to contain/stop further migration of the PCE contaminant plume in groundwater and mitigate and/or eliminate continued/ongoing migration of PCE impacted groundwater to Downgradient receptors and which will also consider remedial options to treat the PCE impacted groundwater. The plan shall include a schedule providing timelines for completing the work.

"Delineation Work Plan" means a plan to install monitoring wells combined with a sampling and analysis plan to determine the vertical and horizontal extent of PCE contamination in all soils and groundwater at the property prepared in general accordance with the requirements outlined in Schedule E of O. Reg. 153/04. The plan shall include a schedule providing timelines for completing the work.

"Director" means the undersigned Director or, if the undersigned is unable to act, any other director authorized to act pursuant to the EPA.

"Downgradient" means a location that receives groundwater from another location; similar to downstream.

"EPA" means the Environmental Protection Act, R.S.O. 1990, c. E.19.

"Financial Assurance Guideline" means the Ministry document "F-15: Financial Assurance Guideline", dated June 2011, as may be amended and that is located at the following url: https:

//www.ontario.ca/document/f-15-financial-assurance-guideline.

"Flow Through Property" means a property in the Study Area that has PCE impacted groundwater contamination coming onto it from an Upgradient source and flowing off of it to a Downgradient property.

"Indoor Air Quality Sampling Plan" means a plan for the collection of representative air quality samples within the indoor air of a building with the purpose of analyzing and characterizing the nature and extent of any PCE contaminants and quantifying the risk, if any, to the occupants of the building. The plan shall include a schedule providing timelines for completing the work. This plan must be prepared in accordance with the Ministry document "(Draft) Technical Guidance for Soil Vapour Intrusion Assessment", dated January 4, 2021, as amended and that can be located at the following url: https://ero.ontario.ca/notice/019-2557.

"Marando Court Corporations" means Marando Court Apartments (Building No. 1) Limited, Marando Court Apartments (Building No. 5) Limited, and Marando Court Apartments (Building No. 6) Limited (active Ontario corporation numbers 89336, 88403, and 89040 respectively).

"Ministry" means the Ontario Ministry of the Environment, Conservation and Parks.

"Order" means this Director's Order No. 1-280716025, as it may be amended.

"Orderees" means the persons to whom the Order is issued as listed above under the Director's Order Issued To section.

"O. Reg. 153/04" means Ontario Regulation 153/04: Records of Site Condition – Part XV.I of the EPA, as amended, made under the EPA.

"Parker's Cleaners" means the common business name of the dry-cleaning operation which until July 2017 operated at 480 Guelph Line, Burlington, Ontario.

"PCE" means perchloroethylene, a dry-cleaning solvent also known as tetrachloroethylene, and, for the purposes of this Order, includes its daughter chlorinated solvent contaminants (e.g., vinyl chloride, trichloroethylene (TCE), etc.) detected at the Source Site and the Study Area. The presence of PCE, TCE, and vinyl chloride contamination in soil and groundwater can pose an environmental and human health concern.

"Preferential Pathways" means highly permeable natural or anthropogenic subsurface features that provides a path of least resistance to allow potentially accelerated and/or alternate route for the migration of contaminants in groundwater or for the movement of vapours that may be caused by shallow fractured bedrock, gas under pressure/landfill gas, or utility conduits.

"Qualified Person" means any person who has obtained the appropriate education and training and has demonstrated experience and expertise in the areas relating to soil and groundwater monitoring, soil vapour intrusion and indoor air quality assessment, which are required to be carried out by this Order and who meets the qualifications set out in Section 5 of O. Reg. 153/04 for conducting a phase two environmental site assessment.

"Right of Way" means land owned by the City of Burlington and includes public walkways, roadways and land used for public utilities and services.

"Source Site" means the property municipally known as 480 Guelph Line, Burlington, Ontario and legally referred to as Part of Lot 16, Conc 3, SDS, Burlington being all of PIN 07068-0212 (LT).

"Study Area" means the properties outlined in Updated Figure 1 attached to the Technical Support Memorandum and Figure A attached to this Order, which includes properties subject to the Order as described in Attachment 1 to this Order.

"Technical Support Memorandum" means the updated memorandum prepared by Luciana Rodrigues dated July 29, 2024, a copy of which is attached as Attachment 2 hereto and outlines the Study Area and the environmental assessment work done and to be done.

"Upgradient" means a location that is the source of groundwater for another location; similar to upstream.

"Waterfront Trail" means that part of the City of Burlington Waterfront Trail that is located in the Study Area between Ward Road and Guelph Line.

Description of Person(s) Subject to the Director's Order

This Order is being issued to the persons responsible for the Source Site, namely the 2021 Orderees who either own or owned or have or had control and management of the Source Site, and to the current owners of various properties within the Study Area with known or suspected PCE groundwater contamination on or under their property.

The 2021 Orderees have been included as they are responsible for contamination originating from the Source Site. The 2021 Order was issued to the 2021 Orderees but they have not complied with all of it and some of them plead guilty to a prosecution at the Ontario Court of Justice.

The other Orderees are included due to either being the owner of an identified Flow Through Property or due to the proximity of the PCE groundwater contamination which could be impacting their property and/or the indoor air quality on their property or a property under their management or control.

The persons responsible for the contamination, the 2021 Orderees, have not carried out the required work to date but are included in doing the work required at all the Flow Through Properties in the proposed Order. However, section 18 of the EPA also authorizes the Director to issue an order to any person who owns or manages or controls a property where it is necessary to prevent, decrease or eliminate an adverse effect that may result from the presence or discharge of a contaminant in, on or under the property. Due to the failure of the 2021 Orderees to comply with the 2021 Order, it is necessary for each property owner to manage the contamination on their respective property.

Each of the Orderees is described in more detail in Attachment 1 hereto.

Description of the Site and/or System/Facility

Attachment 1 hereto includes a description of all of the properties subject to the Order within the Study Area which are also outlined in Figure A attached to this Order.

Reasons for the Director's Order

The summary of events included here provides a summary of the PCE groundwater contamination source and relevant information beginning after the issuance of 2021 Order which led to the issuance of this Order. Prior to the 2021 Order, PCE contamination migrated from the Source Site and has impacted or has likely impacted the properties located within the Study Area. Information related to the issuance of the 2021 Order and events that occurred prior to it being issued is outlined in the 2021 Order, a copy of which has been made available to all of the Orderees.

The ongoing Ministry concern arises in part because PCE can degrade to trichloroethylene (TCE) which can then further degrade to vinyl chloride (VC), a known human carcinogen. TCE and VC vapours can rise from contaminated groundwater, travel through the ground, including Preferential Pathways, and potentially enter the building spaces through sumps or cracks in foundations. Included as an attachment hereto is Figure A that outlines the current sampling results in the Study Area where there has been identified concentrations of PCE contamination in the groundwater.

Since the 2021 Order was issued in relation to the Source Site, there has been additional information obtained by the Ministry that has demonstrated further Downgradient PCE groundwater contamination than was previously known. This new information is highlighted below.

Risk Assessment (RA) at 2421-2431 New Street:

As part of the Risk Assessment accepted for the 2421-2431 New Street property, numerous groundwater monitoring wells were installed on that property, at the property boundary and on the south side of New Street which identified some PCE groundwater contamination concerns and further gaps in delineation of the plume. This work assisted the Ministry in determining that 2411 New Street, 2418 New Street, 2420 New Street, 2422 New Street, 2424 New Street, 2440 New Street and the New Street Right of Way are required to be included in the Study Area. This delineation of the plume is important to define the plume and identify where the contamination is migrating and if the contamination is being impacted by Preferential Pathways.

As the owners of 2421-2431 New Street have fully delineated their properties and have proposed to install engineered risk management measures designed to mitigate/stop the continued migration of PCE groundwater contamination both onto and off of the property as part of their development proposals, they have not been included as an Orderee.

Phase II Environmental Site Assessment (ESA) at 2424 New Street:

The Ministry received notice of groundwater exceedances in a Phase II ESA report for the 2424 New Street Property in 2022 which identified PCE impacted groundwater reaching the southern property boundary on the 2424 New Street property. The information in the Phase II ESA identified the need for further delineation of the plume at the property and south of 2424 New Street, along the Waterfront Trail and in the 2418- 2424 New Street area. This information is necessary to determine whether the Waterfront Trail is being impacted as well as if contamination has migrated south of the Waterfront Trail.

Risk Assessment (RA) at 418-422 Guelph Line:

As part of the ongoing RA work conducted on the 418-422 Guelph Line property, numerous groundwater monitoring wells were installed on that property, at the property boundary and on the Waterfront Trail to the South which identified some PCE groundwater contamination concerns and further gaps in delineation of the plume. The areas south on the Waterfront Trail, 406 Guelph Line, 390 Guelph Line and to the north of the 418-422 Guelph Line property (458 Guelph Line, New Street Right of Way and 2440 New Street) were identified as being required to be in the Study Area. This delineation of the plume is important to define the plume and identify where the PCE groundwater contamination is migrating and if the contamination is being impacted by Preferential Pathways. As these are the furthest south confirmed groundwater exceedances, more groundwater data is needed further south until the southern boundary of the plume is identified.

The owners of 418-422 Guelph Line property have fully delineated their property and have proposed to install an engineered risk management measure designed to mitigate/stop the

continued migration of contamination off of their property as part of their development proposals. As such, they have not been included as an Orderee.

Phase II ESA at 458 Guelph Line:

The property located at 458 Guelph Line at the northwest corner of Guelph Line and New Street was identified to be within the Study Area. The owner of the property voluntarily submitted a Delineation Work Plan that was prepared by a Qualified Person to the Ministry, which was accepted, and the work was completed. The investigations involved the installation and sampling of numerous groundwater monitoring wells on that property. The findings were documented in a Phase II ESA report that was provided to the ministry on January 8, 2025.

The Phase II ESA identified PCE groundwater exceedances on the north, south, and east property boundaries. This property owner has been responsive to the Ministry's requests, has voluntarily conducted work, and has provided information to the Ministry. The Ministry recently requested additional information for this property. Once received, this information will inform next steps required for the property. As such, the owner of 458 Guelph Line has not been included as an Orderee.

Indoor Air Quality Assessment at 2411 New Street:

The property located at 2411 New Street was identified to be within the Study Area to determine any risk of Adverse Effect to the building inhabitants from confirmed nearby PCE groundwater contamination. Halton Condominium Corporation No. 324 voluntarily submitted an Indoor Air Sampling Plan to the Ministry which was reviewed and accepted in February 2026. The first round of indoor air sampling was completed on March 17, 2026. Ministry technical staff are reviewing the results and working with the Halton Condominium Corporation No. 324 on next steps. Halton Condominium Corporation No. 324 has committed to conducting additional rounds of indoor air quality sampling in accordance with the accepted plan to confirm the results and address seasonal and/or temporal variability. As such, the owner of 2411 New Street has not been included as an Orderee.

Proposed collaboration between 2418-2424 New Street:

In response to concerns raised by residential property owners located at 2418, 2420, 2422 and 2424 New Street, the Ministry staff held discussions with representatives of these sites to consider cost saving options through collaboration and submission of a single work plan for groundwater delineation and indoor air sampling within their property boundaries. The approach was initially agreed upon by the four Orderees and a consultant was retained to develop the plan, which aligned with the requirements detailed in the proposed Director's Order. Subsequent revisions were submitted based on Ministry review and feedback. In February 2026, the Ministry was informed of changes in agreement to voluntarily proceed with a work plan. At the time this

Order is issued, the Ministry has not received confirmation that the Orderees for the four properties listed above will proceed voluntarily by the property owners to date, and no work plan has been accepted by the Director for these properties.

Indoor Air Sampling at 466 Guelph Line:

The property located at 466 Guelph Line has voluntarily conducted indoor air sampling in May and December 2025. The Ministry has received and reviewed the reports. While current results suggest the indoor air quality at the site does not present an unacceptable level of health risk to the tenant at this time, PCE was detected in all indoor air sampling locations at concentrations that are not considered to be substantially below the health-based criteria. The property has committed to conducting an additional round of indoor air quality sampling to confirm the results and address seasonal and/or temporal variability. As such, given the commitment to continue with indoor air sampling on a voluntary basis, the Order does not require an Indoor Air Quality Sampling Plan at this time in respect of 466 Guelph Line.

2024 Technical Support Memorandum

The 2024 Technical Support Memorandum describes three different types of work plans that are recommended at properties within the Study Area. Each property requires different work due to the current status of delineation for the property and the proximity of known PCE groundwater concentrations to an on-site building.

A Contaminant Management Plan is required for properties that are either fully or mostly delineated to the extent where enough information is known to accurately form a plan that will prevent the continued migration of contamination Downgradient.

A Delineation Work Plan is required for properties where there are significant gaps in groundwater data which are necessary to understand how contamination is moving through the property and in what concentrations.

An Indoor Air Quality Sampling Plan is required for properties that have a confirmed PCE groundwater exceedance within a close proximity to a building where PCE vapours from the groundwater contamination could potentially enter the building spaces through sumps or cracks in foundations.

Work ordered item No. 1 - 3, and 6 - 16 require the specified Orderees to hire a Qualified Person to prepare and submit the plans outlined within the work ordered item and as described above.

Work ordered item No. 4 is included to require all Orderees to share environmental site information regarding their property to facilitate information sharing and to ensure the extent of

the PCE contamination, or potential impacts in the Study Area, are known.

Work ordered item No. 5 is included in order to arrange for funds to be available for the performance of environmental measures as specified by this Order in the event that Orderees do not comply with the requirements of this Order. It is anticipated that a subsequent order will be issued to require that the 2021 Orderees provide financial assurance to the Crown in the right of Ontario in accordance with the Financial Assurance Guideline in the form and, manner and amount to be specified by the Director and in accordance with Part XII of the EPA. The requirement for other reports detailing estimated costs to complete work required by the other work ordered items have been added for the same reasons.

Work ordered item No. 17 - 18 is included so that all tenants, contractors and any person dealing with a property that is subject to this Order is aware of the Ministry's concerns and involvement in the Study Area.

Work ordered item No. 19 - 21 require the specified Orderees to register a certificate of requirement in the appropriate land registry office, to ensure notice of the order is on title for the specified properties so any persons who may acquire an interest in the property are aware of the Order.

Work ordered item No. 22 is included to carry out the plans once reviewed and accepted by the Ministry. If plans are not accepted by the Ministry, subsequent orders may be issued to address the concerns.

The Ministry has reviewed and considered comments received through public consultation following posting of the proposed Director’s Order on the Environmental Registry of Ontario (ERO notice #019-9032). A summary of the decision is included in the ERO Decision Notice.

Authority to Issue the Director's Order

I am issuing this Director's Order under my authority as a Director under the following legislation, which also includes the authority to take intermediate action and/or procedural steps:

This Order is issued to the Orderees pursuant to EPA s. 18 (1).

I reasonably believe that the requirements specified in this Order are necessary or advisable so as to prevent, or reduce the risk of any discharge of contaminants, namely PCE and its breakdown products into the natural environment from a property, or to prevent, decrease or eliminate an Adverse Effect, that may result from the presence or discharge of a contaminant in, on or under a property.

This Order is issued pursuant to EPA s. 197.

I have authority to make an order or decision affecting real property and to make an order requiring any person with an interest in the property, before dealing with the property in any way, to give a copy of the order or decision affecting the property to every person who will acquire an interest in the property as a result of the dealing, and to have a certificate registered on title in the proper land registry office setting out that requirement for specified properties and reasonably believe that the requirements specified in this Order are necessary and advisable.

Attachments

The attachments listed below, if any, form part of this Director's Order:

1) Figure A: Concentrations of PCE in Groundwater
2) Attachment 1 - Properties and Persons Subject to the Order (5 pages)
3) Attachment 2 - Technical Support Memorandum (6 pages)

ISSUING DIRECTOR

Name: Neil Hannington

Badge Number: 1386

Address: 4145 North Service Road, Suite 300, Burlington, Ontario, L7L 6A3

Director Email: Neil.Hannington@ontario.ca

Office Email: environment.haltonpeel@ontario.ca

Date: June 29, 2026

Signature: Neil David Hannington

Digitally signed by Neil David Hannington
Date: 2026.06.29 10:03:04 -04'00'

APPEAL TO THE ONTARIO LAND TRIBUNAL INFORMATION

REQUEST FOR HEARING

You may require a hearing before the Ontario Land Tribunal if, within 15 days of service of this Director's Order, you serve written notice of your appeal on the Ontario Land Tribunal and the Director as indicated in the Contact Information below. Your notice of appeal must state the portions of this Director's Order for which a hearing is required and the grounds on which you intend to rely at the hearing. Unless you receive leave (permission) from the Ontario Land Tribunal, you are not entitled to appeal a portion of this Director's Order or to rely on grounds of appeal that are not stated in the notice of appeal.

CONTACT INFORMATION

The contact information for the Director and the Ontario Land Tribunal is the following:

Registrar
Ontario Land Tribunal
655 BAY STREET, SUITE 1500 TORONTO, ON M5G 1E5
Email: OLT.Registrar@ontario.ca

and

Director
Ministry of the Environment, Conservation and Parks
Halton-Peel District Office
4145 NORTH SERVICE RD, SUITE 300
BURLINGTON, ON L7L 6A3
Office Email: Environment.HaltonPeel@ontario.ca
Fax: (905) 319-9902

The contact information of the Ontario Land Tribunal and further information regarding its appeal requirements can be obtained directly from the Tribunal at:

Tel: (416) 212-6349, Toll Free: 1(866) 448-2248 or www.olt.gov.on.ca

SERVICE INFORMATION

Service of the documentation referred to above can be made personally, by mail, by fax (in the case of the Director only), by commercial courier or by email in accordance with the legislation under which this Director's Order is made and any corresponding Service Regulation.

ADDITIONAL INFORMATION

Unless stayed by the Director or the Ontario Land Tribunal, this Director's Order is effective from the date of service.

Failure to comply with a requirement of this Director's Order constitutes an offence. Unless otherwise indicated, the obligation to comply with a requirement of this Director's Order continues on each day after the specified compliance date until the obligation has been satisfied.

The requirements of this Director's Order are minimum requirements only and do not mean that you are not required to comply with any other applicable legal requirements, including any:

- statute, regulation, or by-law;
- federal, provincial, or municipal law; or
- applicable requirements that are not addressed in this Director's Order.

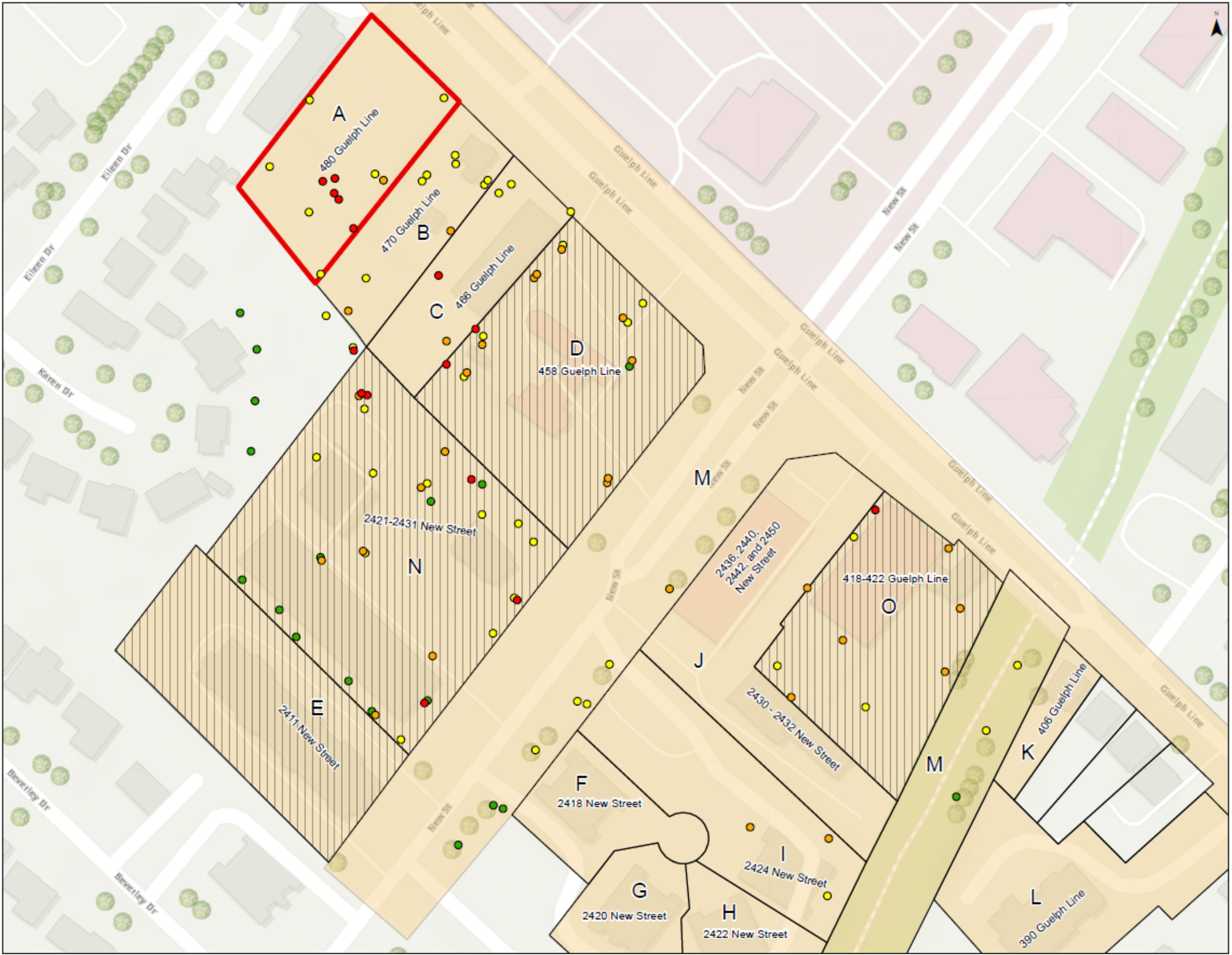
The requirements of this Director's Order are severable. If any requirement of this Director's Order, or the application of any requirement to any circumstance, is held invalid, such finding does not invalidate or render unenforceable the requirement in other circumstances. It also does not invalidate or render unenforceable the other requirements of this Director's Order.

Further orders may be issued in accordance with the legislation as circumstances require.

This Director's Order is binding upon any successors or assignees of the persons to whom this Director's Order is issued.

The procedures to request a hearing and an appeal of this Director's Order and other information provided above are intended as a guide. The legislation should be consulted for additional details and accurate reference. Further information can be obtained from e-Laws at www.ontario.ca/laws.

Figure A: Concentrations of PCE in Groundwater



Ontario

Ministry of the Environment Conservation and Parks

Source Site Property Boundary

[PCE] above 1% - 5% Solubility in water

[PCE] 100 µg/L - 1900 µg/L

[PCE] 0.5 µg/L - 100 µg/L

[PCE] Below Table 7

Study Area

Property conditions have / will be submitted to the ministry and location is not subject to the Order

Notes:

1. Groundwater data obtained through Ministry Submissions. It may not represent current PCE concentrations in groundwater.
2. Monitoring well locations may not be accurately represented.
3. Figure is a companion document of Technical Support memo
4. Not all monitoring wells at the source site and surrounding areas are included on the figure.

Data Sources, Uses and Constraints:

1. Parcel boundary provided by the Ministry of Natural Resources and Forestry, and basemap provided by ESRI.
2. Land Use information provided by the Municipal Property Assessment Corporation.
3. Existing monitoring well locations digitized from documents and reports submitted to the Ministry by others.
4. The groundwater data shown in the Figure was obtained from historical and current subsurface investigation reports submitted to the Ministry. The Figure should only be used for discussion purposes. The Ministry cannot guarantee that the information that has been provided by others is accurate or complete.

Disclaimer:

The maps shown here are for illustration purposes only and are not suitable for site-specific use or applications. Ministry of the Environment, Conservation and Parks provides this information with the understanding that it is not guaranteed to be accurate, correct or complete and conclusions drawn from such information are the responsibility of the user. While every effort has been made to use data believed to be accurate; a degree of error is inherent in all maps. Map products are intended for reference purposes only, and the Ministry of the Environment, Conservation and Parks will accept no liability for consequential and indirect damages arising from the use of these maps. These maps are distributed 'as-is' without warranties of any kind, either expressed or implied, including but not limited to warranties of suitability to a particular purpose or use.

0 12.5 25 50 Metres

A - 480 Guelph Line
B - 470 Guelph Line
C - 466 Guelph Line
D - 458 Guelph Line
E - 2411 New St
F - 2418 New St
G - 2420 New St
H - 2422 New St
I - 2424 New St
J - 2440 New St
K - 406 Guelph Line
L - 390 Guelph Line
M - Guelph Line Roadway, New St Roadway & Waterfront Trail
N - 2421 – 2431 New Street
O - 418 – 420 Guelph Line

Figure A: Concentrations of PCE in Groundwater

Projection
Universal Transverse Mercator
Zone 17N
1983 North American Datum

Published Date: June 3, 2025
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Printed in Ontario, Canada

Attachment 1 - Properties and Persons Subject to the Order (5 pages)

Attachment 1) Properties and Persons Subject to the Order

Note: PIN means the “property identifier number” for the parcel register as identified in the land registry documents.

The Source Site 480 Guelph Line
PIN: 07068-0212 (LT)

John Kalanda Limited is an active Ontario corporation (Ontario corporation number 79499) incorporated on October 31, 1955 and is one of the current owners of the Source Site. John Kalanda, Brian Kalanda and Ross Kalanda are the directors and officers of John Kalanda Limited and the other registered owners of the Source Site and therefore they collectively exercise management and control over the Source Site.

Parker's Cleaners (Burlington) Ltd., is an active Ontario corporation (Ontario corporation number 1643739) formed as a result of an amalgamation, on December 31, 2004, of 1615256 Ontario Limited (incorporated April 21, 2004) and James H. Parker Limited (Ontario corporation number 7048) and carried on the Parker's Cleaners business at the Source Site between 2004 and July 2017 when the business was moved.

Mr. Dion Walton is and has always been, the sole director of Parker's Cleaners (Burlington) Ltd. and therefore is responsible for the management and control of the Parker's Cleaners business at the Source Site between 2004 and 2017.

Mr. James Harold Parker was a director and officer of James H. Parker Limited and was responsible for the management and control of the Parker's Cleaners business at the Source Site between 1965 and 2004. Mr. Parker passed away on October 27, 2021, and Christine Corlett is the appointed trustee of his estate.

The Source Site property is approximately 2,618 square metres. There was a two-story commercial building on the Source Site. Several tenants occupied the building, including a dry cleaner (Parker's Cleaners), which was established at the Source Site in 1965 and ceased operations at that location in 2017. The building at the Source Site has been demolished. In July 2017 the Parker's Cleaners business was moved to a new location and all dry-cleaning equipment was removed.

Although some environmental site assessment work has been done at the Source Site, a Contaminant Management Plan is required.

470 Guelph Line
PIN: 07068-0211 (LT)

The registered owners of 470 Guelph Line are Mary Holubek and Lew Holubek (both deceased and represented by the Co-Trustees of the Holubek Estate). The 470 Guelph Line property has confirmed PCE groundwater contamination on-site. There is also confirmed groundwater contamination present on the Upgradient property (480 Guelph Line) and on a Downgradient property (466 Guelph Line), identifying 470 Guelph Line as a Flow Through Property requiring a Contaminant Management Plan.

The 470 Guelph Line property is approximately 1,757 square metres. The site is currently zoned residential and previously held a private single-family residence before the building was demolished. The property is currently vacant.

466 Guelph Line
PIN: 07068-0210 (LT)

Gerry Strongman Holdings Ltd., an active British Columbia corporation (Ontario corporation number 5029459) is the owner of 466 Guelph Line which has confirmed PCE groundwater contamination on-site. There is also confirmed groundwater contamination present on the Upgradient property (470 Guelph Line) and on a Downgradient property (458 Guelph Line), identifying 466 Guelph Line as a Flow Through Property requiring a Contaminant Management Plan.

The 466 Guelph Line property is approximately 1,777 square metres. The site is currently zoned commercial with a TK HOME Burlington outlet operating on-site.

2418 New Street
PIN: 07197-0091 (LT) and 07197-0101 (LT)

The Marando Court Corporations and Marando Court Apartments (Building No. 4) Limited are the registered owners of 2418 New Street which has confirmed PCE groundwater contamination on the adjacent property to the east and Upgradient of their property on the south side of New Street. As such, a Delineation Work Plan and an Indoor Air Sampling Plan are needed to determine whether contamination is present on-site and/or migrating onto the 2420 New Street property which could potentially be causing an Adverse Effect to the building inhabitants.

The 2418 New Street property is approximately 1,354 square metres. The site is currently zoned residential with 3 storey co-operative housing building being located on-site.

2420 New Steet
PIN: 07197-0097 (LT)

Marando Court Apartments (Building No. 6) Limited is the registered owner of 2420 New Street which has confirmed PCE groundwater contamination on the adjacent property to the east and Upgradient of their property on the south side of New Street. As such, a Delineation Work Plan and an Indoor Air Sampling Plan are needed to determine whether contamination is present on-site and/or migrating onto the 2422 New Street property which could potentially be causing an Adverse Effect to the building inhabitants.

The 2420 New Street property is approximately 1,622 square metres. The site is currently zoned residential with 3 storey co-operative housing building being located on-site.

2422 New Steet
PIN: 07197-0099 (LT) and 07197-0098 (LT)

The Marando Court Corporations and Marando Court Apartments (Building No. 4) Limited are the registered owners of 2422 New Street which has confirmed PCE groundwater contamination on the adjacent property to the east and Upgradient of their property on the south side of New Street. As such, a Delineation Work Plan and an Indoor Air Sampling Plan are needed to determine whether contamination is present on-site and/or migrating onto the Waterfront trail property and could potentially be causing an Adverse Effect to the building inhabitants.

The 2422 New Street property is approximately 2,091 square metres. The site is currently zoned residential with 3 storey co-operative housing building being located on-site.

2424 New Steet
PIN: 07197-0092 (LT) and 07197-0100 (LT)

The Marando Court Corporations and 8037043 Canada Inc., an active Canada corporation, (Ontario corporation number 3066343) are the owners of 2424 New Street which has confirmed PCE groundwater contamination on the property and Upgradient of their property on the south side of New Street. As such, a Delineation Work Plan and an Indoor Air Sampling Plan are needed to determine whether contamination is present on-site and/or migrating onto the Waterfront Trail property and could potentially be causing an Adverse Effect to the building inhabitants.

The 2424 New Street property is approximately 3,042 square metres. The site is currently zoned residential with a three storey apartment building being located on-site.

The property owners had a phase II environmental site assessment conducted and performed some groundwater remediation steps and indoor air analysis in 2022. The Ministry did not approve the methodology of this work at the time and better information is required to understand the contamination on the site.

2440 New Street
PIN: 07197-0093 (LT)

Paris Road Plaza Inc. is an active Ontario corporation (Ontario corporation number 2061773) and the registered owner of 2440 New Street which has confirmed PCE groundwater contamination Upgradient of their property on the south side of New Street and at 458 Guelph Line and Downgradient on the 418-422 Guelph Line property identifying 2440 New Street as a Flow Through Property. As such, a Delineation Work Plan and an Indoor Air Sampling Plan are needed to determine whether contamination is present on-site and could potentially be causing an Adverse Effect to the building occupants.

The 2440 New Street property is approximately 3,844 square metres. The site is currently zoned as commercial with a single storey plaza being located on-site with various commercial use tenants.

406 Guelph Line
PIN: 07197-0080 (LT)

AB Holdings Inc. is an active Ontario corporation (Ontario corporation number 2439304 and is the registered owner of 406 Guelph Line which has confirmed PCE groundwater contamination Upgradient of their property. As such, a Delineation Work Plan and an Indoor Air Sampling Plan are needed to determine whether contamination is migrating onto the 406 Guelph Line property which could potentially be causing an Adverse Effect to the building inhabitants.

The 406 Guelph Line property is approximately 586 square metres. The site is currently zoned residential with 2 residential type building being located on-site. The basement is rented to a tenant for residential use with the other levels used for commercial purpose, most recently as a photography studio.

390 Guelph Line
PIN: 07197-0076 (LT)

Children's Financial Group Inc. is an active Ontario corporation (Ontario corporation number 1961149) and is the registered owner of 390 Guelph Line which has confirmed PCE groundwater contamination Upgradient of their property. As such, a Delineation Work Plan and an Indoor Air Sampling Plan are needed to determine whether contamination is migrating onto the 390 Guelph Line property which could potentially be causing an Adverse Effect to the building inhabitants.

The 390 Guelph Line property is approximately 3,384 square metres. The site is currently zoned residential with a five storey apartment building being located on-site.

City of Burlington Owned Properties
Right of Way (ROW) PINs: 07051-0116 (LT), 07046-0002 (LT), 07068-0002 (LT)
Waterfront Trail PIN: 07197-0096 (LT)

The Corporation of the City of Burlington is a municipal corporation continued under the Ontario Municipal Act, and is the owner of the Guelph Line ROW (between 480 Guelph Line and 390 Guelph Line), New Street ROW (between Beverley Drive and Guelph Line) and the Waterfront Trail (between Ward Road and Guelph Line). Groundwater PCE contamination has been confirmed Upgradient and Downgradient of the New Street ROW and has been confirmed Upgradient and under the Waterfront Trail. PCE groundwater contamination has also been confirmed to the west of the Guelph Line ROW. This presents a significant gap in delineation of the plume.

Technical experts within the Ministry have advised that the extent and potential impacts associated with the contamination (including exposure to workers conducting intrusive activities within the Right of Way) cannot be fully understood unless the contamination plume is delineated and the potential Preferential Pathways such as utility and sewer corridors within these have been assessed and the extent of the PCE contamination is known. As such, a Delineation Work Plan is needed to fill the gaps in the delineation of the plume and to determine whether contamination is migrating off them.

The Guelph Line ROW between 480 Guelph Line and 390 Guelph Line and the New Street ROW between Beverley Drive and Guelph Line are the sections of the ROW expected to be within the PCE plume.

Attachment 2 - Technical Support Memorandum (6 pages)

Ministry of the Environment, Conservation and Parks
Drinking Water and Environmental Compliance Division

Ministère de l'Environnement, de la Protection de la nature et des Parcs
Division de la conformité en matière d'eau potable et d'environnement

Central Region,
Technical Support Section
5775 Yonge Street, 9th Floor
North York, ON M2M 4J1
Tel. (416) 326-6700
Fax (416) 325-6347

Région du Centre
Section d'appui technique
5775, rue Yonge, 8ième étage
North York, Ontario M2M 4J1
Tél. : (416) 326-6700

July 29, 2024

UPDATED MEMORANDUM

To: Tina Dufresne
District Manager

Halton-Peel District Office

Yash Badlani
Environmental Compliance Officer
Halton-Peel District Office

From: Luciana Rodrigues
Regional Hydrogeologist
Technical Support Section, Central Region

Re: Recommendations for further assessment at 480-484 Guelph Line Burlington and surrounding area due to PCE (and associated breakdown products) Contamination

---

1 PURPOSE

This document is an update of my previous memoranda dated March 13, 2024, to address inconsistences identified in the attached figure (Figure 1 – Parker's Cleaners and surrounding area). The update does not impact in any way the conclusions or recommendations that I included in my original memo.

2 INTRODUCTION

During the period of 2018 to 2023, I provided regional technical support services at the request of Halton-Peel District office for the series of properties located at Guelph Line and New Street in Burlington, Ontario. The following paragraphs outline the type of documents that I have reviewed along with a brief summary of key events that have occurred in that timeframe.

For the purpose of this review, residential and commercial properties located downgradient and crossgradient of 480-484 Guelph Line property (Source Site) will be referenced as the "surrounding area".

480-484 Guelph Line, Burlington, On ("Parker's Cleaner's") – the Source Site – & 470 and 466 Guelph Line (G.L. properties)

- 2018: review of on-site and off-site remediation plans prepared for Parker's Cleaners property and surrounding area (MECP, 2018). Subsequent to my review, a Provincial Officer's Order No. 4371-AWL7E was issued to Parker's Cleaners.
- February 2020: review of revised on-site and off-site delineations plans (MECP, 2020a and 2020b). Following my review, an amended Provincial Officer's Order No. 4371-AWPL7E-1 was

issued on June 24, 2020. The Orderees submitted a request for a Director's Review of the order and, a Stay Notice[1] was issued by the Director to allow more time to make a decision.

- October 2020: review of new on-site and off-site delineation plans, and additional documents provided as part of the Director's review (MECP, 2020c).
- November 2022: review of requirements under the Director's Order Number: 431-AWPL7E-2 that was issued on January 22, 2021, and were fulfilled by the Orderees. I provided my findings via email to Mrs. Tina Dufresne (District Manager) and Mr. Trevor Machmer (Sr. Environmental Officer) (MECP, 2022d).

418 and 422 Guelph Line, Burlington, ON ("Bowling Alley")

- 2019: review of Phase I and Phase II ESA reports (MECP, 2019).

2421-2431 St., Burlington, ON ("New St. properties) – crossgradient residential buildings

- July 2020: a cursory review of the Exp memo[2] and groundwater analytical tables. My technical recommendations were provided via email to Messrs. Tim Edward (District Engineer), Trevor Machmer, Ted Belayneh (Water Supervisor), and Mrs. Marinha Antunes (Air Analyst) (MECP, 2023b).

458 Guelph Line, Burlington, ON ("Petro Canada") – south of New St. right of way, downgradient commercial property

- 2021: review of a supplemental groundwater and sampling program letter report (MECP, 2021).

479 and 483 Karen Driven, Burlington, Ontario ("Karen Dr. properties")- adjacent residential properties.

- January 2022: review of environmental reports (MECP, 2022a).
- September 2022: review of a vapour intrusion assessment. My technical recommendations were provided via email to Messrs. Edwards and Machmer (MECP, 2022b and 2022c).
- January 2023: review of a vapour intrusion assessment report. My technical recommendations were provided via email to Mr. Machmer and Mrs. Antunes (MECP, 2023a).
- August 2023: review of a draft vapour intrusion assessment report prepared for 483 Karen Dr. property and provided technical recommendations via email to Messrs. Edwards, Machmer, and Belayneh (MECP, 2023b).

2424 New St. Burlington, ON, ("Residential Building Complex") – south of New St., downgradient residential buildings.

- September 2022: review of a Phase II ESA report. My technical recommendations were provided via email to Messrs. Edwards and Machmer (MECP, 2022b).

3 PURPOSE

As requested, I have completed the review of the documents listed in Table A of this document. Note that I only reviewed certain sections, tables and figures of the risk assessment reports, refer to Table A.

The purpose of this review is to evaluate and provide technical recommendations relating to the further delineation of groundwater contamination migrating from the former Parker's Cleaner's

[1]"Request for Review – Stay Notice and Extension of Time for Review (Amended Provincial Officer's Order No. 4371-AWPL7E-1); prepared by Steve Allingham (MECP), dated July 24, 2020.
[2]"EXP Preliminary Responses to District Comments on RA1707-18B (2421 and 2431 New Street Burlington, Ontario); prepared by EXP Services Inc., dated June 16, 2020.

property towards the surrounding area. The focus of the delineation has been and should be on the contamination relating to perchloroethylene (PCE), the dry-cleaning solvent also known as tetrachloroethylene, and its daughter chlorinated solvent contaminants (e.g., vinyl chloride, trichloroethylene, etc.) detected at the Source Site and surrounding area.

A list of previous technical memoranda is listed in Table B.

4 RECOMMENDATIONS

My recommendations are provided in the following sections of this memorandum. For more information on my analysis, please refer to my previous memoranda listed in Table B of this document. The following recommendations complement my previous technical recommendations.

The attached figure provides the distribution of the PCE plume in groundwater within the surrounding area. The figure was prepared based on the groundwater data provided in the documents listed in Table A and 2022 BlueFrog reports, and likely does not represent current concentrations of PCE and its daughter products at the source site and surrounding area. The figure has been prepared to inform and support my technical review and should not be relied upon to accurately depict the actual extent of the PCE plume in groundwater. It is important to note that the figure does not provide the distribution of PCE's daughter products (e.g., trichloroethylene, vinyl chloride, etc.) and should be considered as an under estimation of the extent of the actual chlorinated solvent plume.

A. Contaminant Plume Delineation – Surrounding Area

Based on previous information and limited new groundwater data provided in the documents listed in Table A, delineation of the PCE contaminant plume in groundwater at the following properties is still required.

I. 2418 New Street, Burlington, ON (south side of New Street)

II. 2420-2424 New Street, Burlington, ON (south side of New Street)

III. 2436, 2440, 2442 and 2450 New Street, Burlington, ON (commercial plaza south side of New Street)

IV. 2430-2432 New Street, Burlington, ON (commercial property located adjacent to the Bowling Alley property).

V. 458 Guelph Line, Burlington, ON (downgradient of the Source)

VI. 406 Guelph Line, Burlington, ON (located south of Waterfront Trail, south of offsite monitoring wells BH/MW1, BH/MW2 and BH/MW3)

VII. 390 Guelph Line, Burlington, ON (located south of Waterfront Trail, southwest of offsite monitoring well BH/MW3)

VIII. Guelph Line and New Street Right of Way (City of Burlington)

B. 2411 New Street (west of New St. properties)

My recommendation listed in Section 4, item C, of my previous memo (MECP, 2021) regarding indoor air sampling is still valid. The contaminant plume in groundwater is still moving and was detected at shallow monitoring MW404 (property boundary well, PCE=2.4 ug/L) and deep monitoring well MW403 (property boundary well, PCE = 200 ug/L) in 2022 groundwater sampling.

C. South of New Street (2436-2450 New St.; 2430-2432 New St.; 406 & 390 Guelph Line)

The groundwater data from monitoring wells installed at Petro Canada (458 Guelph Line) and south of New Street (i.e., MW408A/B, MW409 and MW410) showed that the contaminant plume in groundwater has migrated beyond the New Street right of way. As previously indicated in Section 4.2 of my previous memo (MECP, 2021), assessment of the potential risk from vapour intrusion to the commercial and residential buildings located south of New Street should be undertaken.

D. 466 Guelph Line

PCE and its daughter products plume in groundwater have also been found across the 466 Guelph Line property, which is located right south of the Source Site (refer to Figure 1). Thus, I also recommend assessment of the potential risk from vapour intrusion to the commercial building at this property.

E.* Parker's Cleaner's (480-484 Guelph Line) & 470 and 466 Guelph Line (G.L. properties*)

Elevated concentrations of PCE and/or its daughter products are still being detected in onsite (e.g., P-MW3, 1900 ug/L, WE-MW3S,3600 ug/L, etc.) and offsite monitoring wells (e.g., SM-MW2, 2,200 ug/L, BH-101, 467 ug/L, etc.). Thus, action(s) to contain/stop further migration of contaminant plume in groundwater and mitigate and/or current risk(s) to downgradient receptors is recommended. As such, a contaminant management plan, which should consider remedial options to treat impacted groundwater, is recommended.

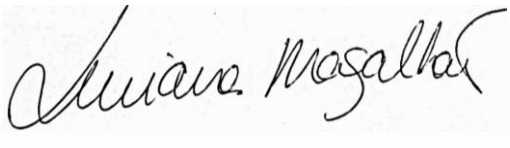
5 ADDITIONAL TECHNICAL INFORMATION

The foregoing recommendations may be revisited in light of any additional technical information that is relevant in assisting the assessment of the offsite groundwater impacts.

6 CLOSURE

The purpose of the preceding review is to provide advice to the MECP's Halton Peel District regarding groundwater conditions and is based on the information provided in the above referenced documents. The conclusions, opinions, and recommendations of the reviewer are based on the information provided by others, except where herein otherwise specifically noted. The MECP cannot guarantee that the information that has been provided by others is accurate or complete. A lack of specific comment by the reviewer is not to be construed as endorsing the content or views expressed in the reviewed material.

If you have any questions regarding the above comments and recommendations, do not hesitate to contact the undersigned.



Luciana Rodrigues, P. Geo.
Regional Hydrogeologist

e.c.c.: Tim Edwards, Halton Peel District Engineer, Central Region
Norman S. Rankin, Counsel, Ministry of the Attorney General, Legal Services Branch, Central Region

TABLE A – Documents Previously and Currently Reviewed
I. "Off-Site Investigation, 418-422 Guelph Line, Burlington, Ontario"; prepared by Exp Consulting Canada, dated February 15, 2023.
II. The following sections of the report "Waldemar LP Risk Assessment", prepared by Exp Consulting Canada, dated July 20, 2020:
"3.2.2 Hydrogeology Information"
"3.3 Contaminant of Concern"
"3.3.2 Sampling Programs"
"3.3.3 Quality Assurance/Quality Control"
"Figures:6A, 6B, 15, 21C and 22C
"Tables: 3-5, 3-6, 3-8 and E.8A"
"Appendix D – Summary of Previous Investigations"
"Appendix F – Phase Two Conceptual Site Model"
III. The following sections of the report "TRG (New-Guelph) Inc. Risk Assessment"; prepared by Exp Consulting Canada, dated May 30, 2020:
"3.2.2 Hydrogeology Information"
"3.3 Contaminant of Concern"
"3.3.2 Sampling Programs"
"3.3.3 Quality Assurance/Quality Control"
"Tables: 3-5, 3-6 and 3-8"
"Figures:6A, 6B, 13A, 13B and 13C"

TABLE A – Previous Technical Memos
MECP, 2018, "2018 On-Site and Off-Site Plans – Former Parkers Cleaners (480 Guelph Line)", prepared by Luciana Rodrigues, dated December 21, 2018.
MECP, 2019. "Groundwater Impacts at 418 and 422 Guelph Line, Burlington, Ontario"; prepared by Luciana Rodrigues, dated January 11, 2019.
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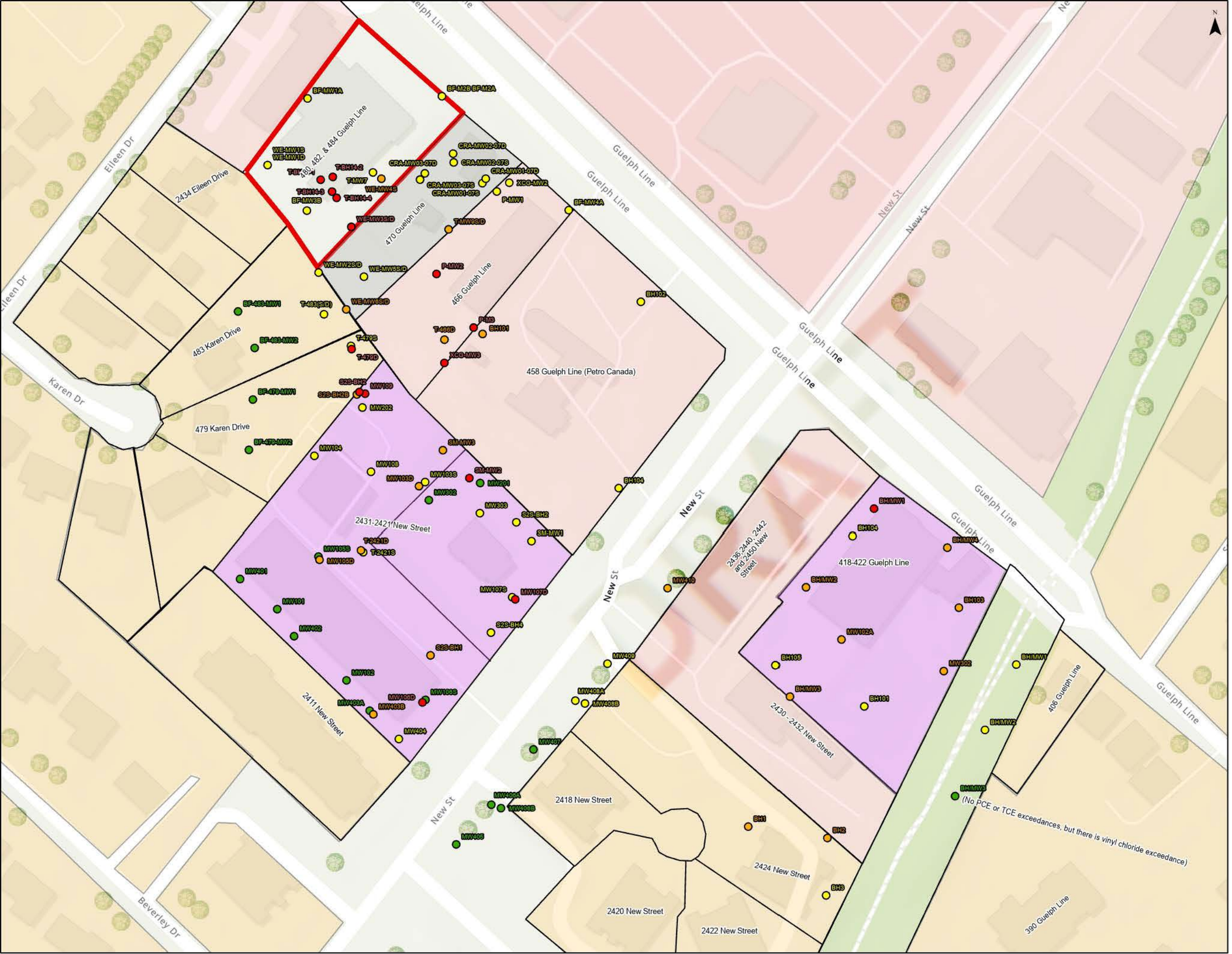

Ontario

Ministry of the Environment Conservation and Parks

- Source Site Property Boundary
- [PCE] above 1% - 5% Solubility in water (indication of free product)
- [PCE] 100 µg/L - 1900 µg/L
- [PCE] 0.5 µg/L - 100 µg/L
- [PCE] Below Table 7
- Parcel Boundaries
- Residential Boundaries
- Commercial Boundaries
- Vacant Zone Residential
- Commercial Future Residental

MW "xx" B/MW"xx" D---deep monitoring well
MW "xx" A/MW "xx" S---shallow monitoring well

Notes:

1. Groundwater data obtained through Ministry Submissions. It may not represent current PCE concentrations in groundwater.
2. Monitoring well locations may not be accurately represented.
3. Figure for internal use only.
4. Figure is a companion document of Technical Support memo
5. Not all monitoring wells at the source site and surrounding areas are included on the figure.

Data Sources, Uses and Constraints:

1. Parcel boundary provided by the Ministry of Natural Resources and Forestry, and basemap provided by ESRI.
2. Land Use information provided by the Municipal Property Assessment Corporation.
3. Existing monitoring well locations digitized from documents and reports submitted to the Ministry by others.
4. The groundwater data shown in the Figure was obtained from historical and current subsurface investigation reports submitted to the Ministry. The Figure should only be used for discussion purposes. The Ministry cannot guarantee that the information that has been provided by others is accurate or complete.

Disclaimer:

The maps shown here are for illustration purposes only and are not suitable for site-specific use or applications. Ministry of the Environment, Conservation and Parks provides this information with the understanding that it is not guaranteed to be accurate, correct or complete and conclusions drawn from such information are the responsibility of the user. While every effort has been made to use data believed to be accurate; a degree of error is inherent in all maps. Map products are intended for reference purposes only, and the Ministry of the Environment, Conservation and Parks will accept no liability for consequential and indirect damages arising from the use of these maps. These maps are distributed 'as-is' without warranties of any kind, either expressed or implied, including but not limited to warranties of suitability to a particular purpose or use.

0 12.5 25 50 Metres

Updated Figure 1- Concentrations of PCE in Groundwater – Parker's Cleaners and surrounding area

Projection
Universal Transverse Mercator
Zone 17m
1983 North American Datum

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