



Phase One Environmental Site Assessment

1493 Sixth Line, Oakville, Ontario

February 6, 2026
Trace Project No. 900-0494-01

Prepared for:

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DOCUMENT CONTROL

Revision	Description	Project Manager	File Location	Date Issued
Draft	Issued for client review	D. Grant Walsom	P: Drive (Secretary)	February 6, 2026
0	Issued for client use	D. Grant Walsom	P: Drive (Secretary)	February 6, 2026



EXECUTIVE SUMMARY

The Penalta Group (the Client) retained Trace Associates Inc. (Trace) to prepare a Phase One environmental site assessment (ESA) in support of a development application for the property municipally addressed as 1493 Sixth Line, in Oakville, Ontario, hereinafter referred to “the Phase One Property.”

The Phase One Property is a generally flat rectangularly shaped parcel measuring approximately 0.81 hectares (2 acres) in size, located in the east-central portion of Oakville, Ontario. At the time of the site visit, the Phase One Property was occupied by a two-story residential building, with a basement in the northwestern portion of the property and a gravel driveway leading from Sixth Line. Two additional sheds were also noted on the property at the time of the site visit. The majority of the Phase One Property (northern and eastern portions) is covered with trees.

Historical addresses associated with the Phase One Property were first identified to be residential as of 1960 in city directories, which were provided in a 2025 Phase I ESA conducted by Rowan Williams Davies & Irwin Inc. Review of city directories indicated that the majority of Sixth Line has been primarily used for residential purposes since it was first developed or shortly after it was first developed.

The Client requested this Phase One ESA in preparation for the potential redevelopment of the Phase One Property for residential use. The development application triggers the need for a Record of Site Condition (RSC)-compliant Phase One ESA, in accordance with *Ontario Regulation 153/04 (O. Reg.): Records of Site Condition*, as amended, made under the *Environmental Protection Act*.

As described in O. Reg. 153/04, the objectives of the Phase One ESA are to develop a preliminary determination of the likelihood that one or more contaminants have affected land or water on, in, or under the Phase One Property, to determine the need for a Phase Two ESA, and to provide a basis for carrying out any Phase Two ESA required.

The results and conclusions of the Phase One ESA are as follows:

- The Phase One Property consists of one property municipally addressed as 1493 Sixth Line, in Oakville, Ontario. According to Zoning By-law No. 2014-014, the Phase One Property is zoned as a “Natural Area.” Section 13.2 of City Zoning By-law No.2014-014 states that permitted uses within the “Natural Area” zoning designation are limited to conservation, private and public parks, and stormwater management facilities, and that no habitable buildings or habitable structures shall be permitted. It is understood that a change of zoning is underway with the Town of Oakville.
- The Phase One Property is currently developed with a single residential dwelling. The residential dwelling is not currently occupied.
- Based on proximity to local waterbodies, regional groundwater is expected to flow to the south, towards Munn’s Creek. It is noted that this shallow groundwater flow direction may not be representative of the shallow groundwater flow direction outside the investigated area, as the direction of shallow groundwater flow may be locally influenced by buried utilities, geology, and surface structures (e.g., roadways or buildings).
- A Phase Two ESA is required prior to the filing of an RSC. Although an RSC is not required, a Phase Two ESA has been prepared by Trace and provided under separate cover.



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- Potentially contaminating activities were identified on the Phase One Property and in the Phase One Study Area (i.e., the Phase One Property and surrounding 250 m).
 - Two APECs were identified on the Phase One Property relating to historical activities at the Phase One Property and in the Phase One Study Area. Trace investigated the APECs in a May 2025 Limited Phase II ESA and through groundwater sampling activities conducted in December 2025 (report provided under separate cover), which indicated that there were no soil or groundwater impacts to the Phase One Property associated with the identified APECs.



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1.0 INTRODUCTION

Penalta Group Ltd. (the Client) retained Trace Associates Inc. (Trace) to prepare a Phase One environmental site assessment (ESA) in support of the development application with the Town of Oakville, for the property and buildings municipally addressed as 1493 Sixth Line, in Oakville, Ontario, hereinafter referred to as “the Phase One Property.” Although a Record of Site Condition (RSC) is not needed, an-RSC compliant Phase One ESA is required to support the development application. Trace conducted the work according to Trace’s Professional Report Conditions, provided as Appendix A.

The Phase One Study Area includes properties (whole or in part) located within a 250-m radius of each boundary of the Phase One Property, as shown on Figure 1. No properties outside of the 250-m radius were deemed necessary to be included in the Phase One Study Area.

A site plan showing the details of the Phase One Property is shown on Figure 2. Select photographs taken during the site visit are presented in Appendix B.

This Phase One ESA was prepared by Barbara Voutos of Trace. D. Grant Walsom was Trace’s Qualified Person (QP) supervising this Phase One ESA and provided internal review. Qualifications of Barbara and Grant are presented in Section 1.4.

Trace’s QP supervising this Phase One ESA is:

D. Grant Walsom, B.A.Sc., P.Eng., QP_{ESA}
Partner / Principal Engineer
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519.741.5774

1.1 Phase One Property Information

The Phase One Property is legally described as LOT 6, PART OF LOT 403, BLOCK A, and PART OF LOT 403, in the Town of Oakville. A legal survey was provided as part of the Phase I ESA conducted for the property (RWDI, 2025).

The Phase One Property consists of one property municipally addressed as 1493 Sixth Line, in Oakville, Ontario. According to Zoning By-law No. 2014-014 (TOO, 2014), the Phase One Property is zoned as a “Natural Area.” Section 13.2 of Zoning By-law No. 2014-014 states that permitted uses within the “Natural Area” zoning designation are limited to conservation, private and public parks, and stormwater management facilities, and that no habitable buildings or habitable structures shall be permitted.

The Phase One Property is rectangular in shape and is approximately 0.81 hectares (ha) (2 acres) in size, located in the northeastern portion of Oakville, Ontario. The Phase One Property is currently occupied with one residential dwelling.

The municipal address of the Phase One Property owner is:

Penalta Group Ltd.
504 Iroquois Shore Road
Oakville, Ontario L6H 3K4
905.484.9857



1.2 Background

It is Trace's understanding that the intended use of this Phase One ESA report is to support a development application with the Town of Oakville for the Phase One Property, from the current single-tenant residential use to multi-tenant residential use. Trace further understands that this Phase One ESA is to be prepared in general accordance with *Ontario Regulation 153/04 (O. Reg.): Records of Site Condition*, as amended, made under the *Environmental Protection Act (GO, 2004)*.

1.3 Objectives

As described in O. Reg. 153/04 (GO, 2004), the objectives of this Phase One ESA are to:

- Develop a preliminary determination of the likelihood that one or more contaminants have affected land or water on, in, or under the Phase One Property.
- Determine the need for a Phase Two ESA.
- Provide a basis for carrying out any Phase Two ESA required.

1.4 Qualifications of Assessors

Barbara Voutos, B.Eng., P.Eng., prepared the report. Barbara is a licensed Professional Engineer with over six years of experience in the environmental due diligence field in Trace's Kitchener, Ontario office. Barbara's experience and interests lie mainly in contaminated sites management, ESAs, groundwater monitoring, and soil/groundwater remediation. Barbara's expertise involves the preparation of site assessment reports, technical reports, soil and groundwater sampling, and remediation. Barbara is licensed as a Professional Engineer with Professional Engineers Ontario and is current with the jurisdictional professional development requirements. Barbara is currently providing expertise mainly in the preparation of technical reports. She has been involved in the management, execution, and reporting of site assessments and remediation activities at various residential, commercial, and industrial properties. Barbara has assisted in remedial work plans, cost estimates, and the oversight of drilling work and remedial excavations. Barbara has experience managing fieldwork activities and conducting groundwater and soil sampling activities. Barbara has been involved in the execution of indoor air and ambient air quality and/or soil vapour and sub-slab vapour sampling programs. Barbara has conducted several designated substance and hazardous materials surveys in residential, commercial, and industrial buildings in Ontario, for potential asbestos- and lead-containing materials to satisfy the requirements of *O. Reg. 490/09: Designated Substances (GO, 2009)*.

D. Grant Walsom, B.A.Sc., P.Eng., QP_{ESA}, reviewed the report. A Senior remediation engineer with over 30 years of experience and a Partner and Principal Engineer at Trace, Grant is a Professional Engineer registered in Ontario and Alberta, and a registered Consulting Engineer in Ontario. In addition, he is a QP as defined by O. Reg. 153/04 (GO, 2004) and O. Reg. 406/19 (GO, 2019). Grant's expertise has included Phase I and II ESAs, site remediation, RSCs, and environmental compliance audits (for both external and pre-acquisition purposes). He has conducted numerous Brownfield redevelopments and soil and groundwater remediation projects with virtually all contaminant sources, including metals, polychlorinated biphenyls (PCBs), petroleum hydrocarbons, chlorinated solvents and volatile organic compounds, and polycyclic aromatic hydrocarbons (including coal tar). With his experience, he has been asked on numerous occasions to peer review existing documents and act as an expert witness for legal cases around contamination in soil and groundwater. He has been a leader in Ontario for the implementation of *O. Reg. 406/19: On-site and Excess Soil Management (GO, 2019)*. Grant currently is the Past Chair of the Board of Directors for the Ontario Environment Industry Association (ONEIA) and a past Co-chair for the



Excess Soils Working Group. He also served on the Board of Directors for the Canadian Brownfield Network as Past President and now as an advisor. Grant proudly founded the Qualified Persons Community of Ontario (QPCO) and serves as the Council Chair and participates in many of the QPCO committees. He was proudly named the 2015 “Brownfielder of the Year” by the Canadian Urban Institute and received the ONEIA “Skip Willis Award” for 2019. Grant enjoys participating in speaking engagements and presentations regarding site remediation case-studies, Brownfield redevelopment, and excess soil management.

2.0 SCOPE OF INVESTIGATION

There are four principal components of an O. Reg. 153/04-compliant Phase One ESA (GO, 2004). The four principal components are:

- Records review
- Interviews
- Site visit
- Evaluation of information and reporting

2.1 Records Review

The objectives of a records review are to obtain and review records that relate to the Phase One Property and to the current and past uses of and activities at or affecting the Phase One Property. The records review was conducted to determine if any areas of potential environmental concern (APECs) exist and to interpret the APECs. The site history was reviewed back to the first developed use of the Phase One Property, as defined by O. Reg. 153/04 (GO, 2004).

Neighbouring properties may impact the Phase One Property. The Phase One ESA Study Area, as defined by O. Reg. 153/04, is a 250-m radius surrounding the Phase One Property. Records were obtained and reviewed that relate to properties in the Phase One Study Area to determine if current or past uses have included potentially contaminating activities (PCAs).

All sources of information reviewed were documented even if the source revealed nil findings or no response.

2.1.1 Property Records

The mandatory records requested for review for the Phase One Property included the following:

- Property-use records, including fire insurance plans (FIPs), property underwriter’s reports (PURs), and city directories.
- A title search back to the date of the first developed use or prior to 1875 of the Phase One Property. Title searches for each property in the Phase One Property were conducted back to 1829. A review of other historical documents was used to determine the first developed use of the Phase One Property, as discussed in Section 3.1.2.
- Prior environmental reports prepared with respect to the Phase One Property by or on behalf of a current or former owner, including ESA reports (i.e., Phase I ESAs), remediation reports, reports in response to



a Ministry of the Environment, Conservation and Parks (MECP, or the Ministry¹) Order, or any other report relating to the presence of a contaminant or APEC. The following environmental reports were reviewed for this Phase One ESA:

- Phase I Environmental Site Assessment (RWDI, 2025)
- Limited Phase II Environmental Site Assessment (Trace, 2025b)
- Designated Substances and Hazardous Materials Survey (DSHMS) (Trace, 2025a)
- Water well records from the property owner.

2.1.2 Environmental Source Information

The following information sources were investigated for properties within the Phase One Study Area:

- National Pollutant Release Inventory information, maintained by Environment Canada.
- PCB information, maintained by the MECP.
- Certificates of Approval (CofA), Permits to Take Water, Certificates of Property Use, or similar instruments related to the environmental condition of the Phase One Property and any property on, under, or adjacent to the Phase One Property and issued pursuant to an Act administered by the MECP, whether or not in force.
- Inventory of coal gasification plants, maintained by the MECP.
- Records concerning environmental incidents, orders, offences, spills, discharges of contaminants, or inspections maintained by the MECP where the incident, order, offence, spill, discharge, or inspection affects the Phase One Property and any property on, under, or adjacent to the Phase One Property.
- Waste management records, including current and historical waste storage locations and waste generator and receiver information maintained pursuant to *O. Reg. 558/00: General – Waste Management* (GO, 2000), or its predecessors with respect to the Phase One Property and any property on, under, or adjacent to the Phase One Property.
- Reports submitted to the MECP related to the environmental conditions of the Phase One Property and any property on, under, or adjacent to the Phase One Property.
- Retail fuel storage tanks information maintained by the Technical Standards and Safety Authority (TSSA).
- Notices and instruments, including RSCs, posted in the Environmental Site Registry.
- Identification of areas of natural significance maintained by the Ministry of Natural Resources (MNR).
- Landfill information maintained by the MECP.

¹ Previously also known as the Ministry of the Environment (MOE), Ministry of the Environment and Energy (MOEE), and the Ministry of Environment and Climate Change (MOECC).



In addition to the required information listed above, a database search report was obtained from Environmental Risk Information Services Ltd. (ERIS). The additional databases included in this report are discussed in Section 3.2.

2.1.3 Physical Setting Source Information

The following information sources were obtained and reviewed for properties within the Phase One Study Area:

- Aerial photographs of the Phase One Study Area.
- Topographic maps (Ontario Base Map series), which illustrate the location of the Phase One Property in relation to any waterbodies in the Phase One Study Area and document regional topography.
- Physiographic maps to define regional physiography in the Phase One Study Area, as well as maps to obtain information about the surficial soil and bedrock in the Phase One Study Area.
- Geological maps, to define the regional geology in the Phase One Study Area and to obtain information about the stratigraphy of the overburden, from ground surface to bedrock, including approximate depth to bedrock and type of bedrock.
- Well records and other relevant data for any operating or abandoned wells, including wells described or defined under the *Ontario Water Resources Act* (GO, 1990), in the Phase One Study Area, to identify the presence of such wells and to make appropriate use of the records and data to help determine the hydrogeological and geological characteristics of the Phase One Study Area.

2.2 Interviews

The objectives of conducting the Phase One ESA interviews are to:

- Obtain information to assist in determining if an APECs exist.
- Identify details of PCAs or potential contaminant pathways in, on, or under the Phase One Property.

2.3 Site Reconnaissance

The objectives of the site visit component of a Phase One ESA are to:

- Determine if APECs exist through observations about current and past uses and PCAs on, in, or under the Phase One Property and, as practicable, current, and past uses and activities and PCAs in the Phase One Study Area.
- Identify details of potential contaminant pathways on, in, or under the Phase One Property, as well as APECs and contaminants of potential concern (COPCs).

During the site visit, Ben Wallace, a Development Manager for the owner of the Phase One Property, who has been familiar with the Phase One Property since July 2025, was interviewed.



The site visit was comprised of:

- Inspecting the Phase One Property and observing the Phase One Study Area's properties from the Phase One Property and public areas.
- Identifying structures and other improvements, including the age of the buildings.
- Identifying number, age, and depth of any underground structures.
- Identifying and describing above-ground storage tanks (ASTs) and underground storage tanks (USTs), other storage containers, and odours.
- Identifying and describing the potable water supply source.
- Identifying visual and suspected areas of surface and subsurface contamination.
- Identifying probable cut and fill operations that may have required that fill of unknown quality be deposited on the Phase One Property.
- Identifying and describing underground utility and service corridors, such as sewer, water, electrical, or gas lines.
- Identifying neighbouring land uses (i.e., sensitive neighbours or potential off-site contamination which may impact the Phase One Property).
- Identifying chlorofluorocarbons (CFCs) in use, including air-conditioning and refrigeration equipment that may use CFCs.
- Inspecting the interior of structures for evidence of contamination, including observing heating and cooling systems for emissions and wastes, stains, floor cracks, sumps and drains, hydraulic hoists, and elevators.
- Inspecting the exterior of structures for indications of contamination, observing topographic, geographic, and hydrogeologic conditions, and providing a general description of the structures, wells, sewage disposal, pits and lagoons, stressed vegetation, wastewater discharge, watercourses, ditches and standing water, roads, parking facilities, and rights-of-way (RoWs).
- Identifying and noting unidentified substances found at the Phase One Property.
- Identifying any PCA at the Phase One Property and in the Phase One Study Area.
- Identifying, locating, and documenting waterbodies or areas of natural significance within the Phase One Study Area.
- Identifying possible asbestos-containing materials (ACMs) and urea formaldehyde foam insulation (UFFI).
- Identifying potential PCB-containing electrical capacitors and transformers.
- Identifying potential lead-based paints.



- Identifying other substances and conditions including radon, water damage, and mould.
- Listing other hazardous materials, including wastes and their relative quantities, types of containers, and storage conditions.

2.4 Review, Evaluation, and Reporting

The findings of the records review, interviews, and site visit were evaluated and presented in this report. Specifically, it clearly identifies areas of actual and potential contamination and the basis for the findings, including nil findings. The relative degree of uncertainty associated with evidence of potential contamination is discussed.

The Phase One ESA report provides conclusions as required by O. Reg. 153/04 (GO, 2004), based on a review of the available information and the exercise of professional judgment.

This Phase One ESA report has been prepared in accordance with the format defined by O. Reg. 153/04. Supporting documentation has been included in appendices as indicated throughout the text.

3.0 RECORDS REVIEW

3.1 General

3.1.1 Phase One Study Area Determination

The Phase One Study Area includes properties (whole or in part) located within a 250-m radius of each boundary of the Phase One Property, as shown on Figure 1.

Based on a preliminary review of topographic maps, current aerial photographs obtained from Trace's aerial photograph library, Google Earth™, and Trace's knowledge of the area, no properties outside of the 250-m radius were deemed necessary to be included in the Phase One Study Area. Subsequent to the preliminary review, no properties outside of the pre-defined Phase One Study Area were identified during the interviews and site visit that required inclusion in the Phase One Study Area.

3.1.2 First Developed Use Determination

The determination of the first developed use of the Phase One Property included a review of land title search documents, PURs, city directories, aerial photographs, internet searches, and information included in the Phase I ESA conducted by Rowan Williams Davies & Irwin Inc (RWDI) (2025) and provided to Trace by the owner of the Phase One Property.

Historical addresses associated with the Phase One Property were first identified to be residential as of 1960 in city directories, which were provided in the Phase I ESA (RWDI, 2025). Review of city directories indicated that the majority of Sixth Line has been primarily used for residential and commercial purposes since it was first developed or shortly after it was first developed.

3.1.3 Chain of Title

In 2025, RWDI contracted ERIS to conduct a title search for the Phase One Property (RWDI, 2025). The search was conducted from current ownership to prior to 1829. The title search documents provided in RWDI's Phase I ESA were reviewed by Trace during this Phase One ESA and are summarized in Table A:



Table A: Summary of Title Search Results for the Phase One Property

Period	Registered Owner
Property Identification No. (PIN): 24010303201360000000	
Prior to 1849	Crown
1849	John A. Chisholm
1849 to 1854	Charles Culham, John Culham
1854 to 1894	Charles Culham
1894 to 1896	Ephraim Smith
1896 to 1905	Anne Jane Furness
1905	Clara Helena Furness
1905 to 1909	Peter Syderham Furness
1909 to 1913	The Provident Investment Company
1913 to 1922	Herbert Caplin Cox
1922 to 1932	Hugh S. Wilson
1932 to 1947	Ryland H. New
1947 to 1980	Burnet K. Snider
1980 to 1993	Barbara Post
1993 to 1997	Maurice Andrew Post, Barbara Betty Post
1997 to 2022	Barbara Betty Post
2022 to 2025	Elizabeth Robin Post, Lynda Joan Funk

3.1.4 City Directories

City directory information for the Phase One Property and the Phase One Study Area was provided by ERIS as part of the Phase I ESA from Might's City Directory for the years 1958 to 1996, Polk's City Directory for the year 2001, Cole's City Directory for the year 2008, and a digital business directory for the years 2012 to 2023 (RWDI, 2025). Note that city directory information was only ordered for the Phase One Property and 1500 Sixth Line (the adjacent property to the west-southwest, across Sixth Line). Trace did not order additional city directory information as part of this Phase One ESA.

Table B provides a list of historical occupants at the Phase One Property and directly adjacent sites. City directory listings determined to represent PCAs are noted with an asterisk and discussed in more detail in Table C.



Table B: Summary of City Directories Reviewed		
Location	Occupancy Date	Listed Occupant
1493 Sixth Line (the Phase One Property)		
Phase One Property	1958, 1971, 1991, and 2008	▪ Address not listed
	1965	▪ Vacant
	1960, 1975, 1985, 1981, 1996, and 2001	▪ Residential, one tenant
1500 Sixth Line (downgradient)		
Adjacent to the west-southwest, across Sixth Line	1960 to 1981, and 1991	▪ Address not listed
	1985	<ul style="list-style-type: none"> ▪ Doctor's Office ▪ Embassy Cleaners ▪ Lira's Pizza Place ▪ Mccoy's Cards and Gifts ▪ Min A Mart Ltd. ▪ Nick's Custom Tailor ▪ Olde Oak Restaurant ▪ Reel Fun Video Inc. ▪ The Hair Beauty Centre
	1996	<ul style="list-style-type: none"> ▪ Arts Fish and Chips ▪ Ginos Pizza ▪ Han in Hand Family Resource ▪ Hasty Market ▪ North Oak Dental Office ▪ Pitchers ▪ Sketchley Cleaners* ▪ Spotlight Video
	2001	<ul style="list-style-type: none"> ▪ 2-4-1 Videos & Games ▪ Arts Fish and Chips ▪ Hasty Market ▪ North Oak Dental Office ▪ Oakville Parents ▪ Pitchers ▪ Sketchley Cleaners* ▪ The Design Crew ▪ Time Out Mickeys
	2008	<ul style="list-style-type: none"> ▪ Arts Fish and Chips ▪ Marios 241 ▪ North Oak Dental ▪ Oakville Parent Child Centre ▪ Sixth Line Pub ▪ The Wingery Inc ▪ Your Looks



Table B: Summary of City Directories Reviewed		
Location	Occupancy Date	Listed Occupant
<ul style="list-style-type: none"> ▪ 1500 Sixth Line cont. 		
	2012	<ul style="list-style-type: none"> ▪ 241 Videos and Games ▪ Arts Fish and Chips ▪ Design Crew ▪ Hasty Market ▪ Marios Two for One Pizza ▪ North Oak Dental ▪ Oakville Parent-Child Centre ▪ Pitchers Restaurant Time ▪ Sketchley Cleaners* ▪ Wingery Inc. ▪ Your Looks
	2017 to 2023	<ul style="list-style-type: none"> ▪ Arts Fish and Chips ▪ Coco Nails Spa ▪ Hasty Market ▪ Marios Two for One Pizza ▪ North Oak Dental ▪ Oakville Parent Child Centre ▪ Roots Hair Esthetics ▪ Sixth Line Pub ▪ Sketchley Cleaners* ▪ Wingery Inc.

Notes: * indicates a PCA

Based on the review of city directories for the Phase One Property and surrounding area, PCAs have been identified for the Phase One Study Area.

1500 Sixth Line, located adjacent to the west-southwest, across Sixth Line, was identified as a multi-tenant commercial property since 1985. As identified in the city directories summarized above, review of available records indicates that Sketchley Cleaners has been a tenant at this property from 1996 to 2023. At the time of the site visit, Trace personnel observed that this unit was occupied by The Clothespin, identified as a dry cleaner, laundry service, and alterations facility. Although dry-cleaning facilities are typically classified as PCA #37 – Operation of Dry-cleaning Equipment (Where Chemicals Are Used), the available information does not indicate that this tenant utilized or generated hazardous dry-cleaning chemicals (including halogenated solvents). Specifically, the property was not identified in the ERIS database as a hazardous waste generator and no records of solvent use were reported. Based on the downgradient location of this property, the lack of reported spills, and chemical use, it is not considered to be an APEC to the Phase One Property.

The noted PCAs are summarized in Table C:



Table C: Summary of Potentially Contaminating Activities Identified in City Directories Reviewed

Address	Location	PCAs	Summary of Actual Issue	Evaluation as an APEC
1500 Sixth Line	Adjacent property to the west-southwest of the Phase One Property, across Sixth Line	#37 Operation of Dry-cleaning Equipment (Where Chemicals Are Used)	Listed as Sketchley Cleaners, conducting dry-cleaning services between 1996 and 2023.	No, based on the downgradient location across Sixth Line.

3.1.5 Fire Insurance Plans

FIPs assist in the identification of historical land use and commonly indicate the existence and location of ASTs, USTs, structures, improvements, and facility operations. As part of the Phase I ESA, RWDI contracted ERIS, which subcontracted Verisk Analytics, Inc. (Verisk) to search for FIPs for the Phase One Property and surrounding properties (RWDI, 2025). Verisk indicated no FIPs were available for the Phase One Property or the Phase One Study Area. As such, Trace did not request FIPs as part of this Phase One ESA.

3.1.6 Property Underwriter's Reports

As part of the Phase I ESA, RWDI contracted Verisk to search for available PURs and Site Plans for the Phase One Property (RWDI, 2025). Verisk indicated that no PURs or Site Plans were available for the Phase One Property or the Phase One Study Area. As such, Trace did not request PURs or Site Plans as part of this Phase One ESA.

3.1.7 Regulatory Agency Records

Site personnel were unaware of any outstanding regulatory agency concerns, complaints, notices of violation, or directives that have been issued against the Phase One Property, and were also not aware of any permits (e.g., CofA, storage tank registrations, or facility operating permits) that pertain to activities that may impact the environmental condition of the Phase One Property.

3.1.7.1 Freedom of Information Request

Trace submitted a request to the MECP under the *Freedom of Information and Protection of Privacy Act* (FIPPA) for information regarding any permits/approvals, past complaints, violations, and/or MECP directives concerning the Phase One Property and directly adjacent properties. A copy of the FIPPA search request for the Phase One Property and adjacent properties is included in Appendix C.

3.1.7.2 Technical Standards and Safety Authority Files

Trace submitted a request to the TSSA to obtain information with respect to the potential storage of petroleum fuels at the Phase One Property and adjacent properties and to determine if there have been any infractions of provincial regulations concerning the storage of petroleum or associated products. Records were requested for the following properties:

- The Phase One Property (1493 Sixth Line)
- The properties at 1500, 1510, 1511, and 1518 Sixth Line
- The properties at 1471, 1472, 1476, and 1477 Sixth Line



- The property at 36 Upper Middle Road

According to the TSSA database and information received from the TSSA, no records were available for the Phase One Property. The TSSA indicated that the property located at 36 Upper Middle Road East contained one active fuel storage tank.

A copy of the TSSA database search results and records received from the TSSA are provided in Appendix C.

3.1.7.3 Records of Site Condition

No RSCs were identified in the ERIS database report provided in the Phase I ESA (RWDI, 2025), within the Phase One Study Area.

3.1.8 Environmental Reports

The following previous environmental reports for the Phase One Property were available for review and provided by the Client.

3.1.8.1 Rowan Williams Davies & Irwin Inc. – Phase I Environmental Site Assessment (2025)

In March 2025, RWDI was retained by Black Dog Developments (BDD) to conduct a Phase I ESA for the Phase One Property (RWDI, 2025). RWDI indicated that the Phase I ESA was requested for due diligence purposes prior to the potential purchase of the Phase One Property.

The conclusions of the Phase I ESA are summarized as follows:

- A fuel oil AST associated with a previous oil heating system was historically located in the basement of the residential dwelling on the Phase One Property. RWDI concluded that the presence of this AST represented an environmental concern for the Phase One Property.
- Historical spills had occurred within the Phase One Study Area, including transformer spills. The properties where spills occurred (1478 and 1490 Elm Road) are downgradient of the Phase One Property and RWDI concluded that they do not pose an environmental risk to the Phase One Property.
- TSSA records indicated that an AST existed at the property located at 36 Upper Middle Road, approximately 150 m upgradient from the Phase One Property. RWDI concluded that the presence of this AST presented a potential environmental concern to the Phase One Property.

Based on the findings of the Phase I ESA, RWDI recommended further investigation in the form of a Phase II ESA to assess the environmental conditions at the Phase One Property. RWDI also recommended that a DSHMS be conducted prior to future demolition and/or construction work within the existing dwelling.

3.1.8.2 Trace Associates Inc. – Designated Substances and Hazardous Materials Survey (2025)

In June 2025, Trace was retained by BDD to conduct a DSHMS of the residential building located at the Phase One Property (Trace, 2025a). The purpose of the DSHMS was to determine if any designated substances and other potentially hazardous materials were present prior to demolition and/or renovation, and to provide references for the management required to mitigate potential exposure to persons entering the building and/or conducting any demolition or renovation activities.



The DSHMS involved a site visit and collecting and testing of building materials suspected of being asbestos containing, and of potential lead-based surface coatings. Designated substances, defined by the Ontario Ministry of Labour, Immigration, Training and Skills Development (MLITSD) under O. Reg. 490/09 (GO, 2009) and O. Reg. 278/05 (GO, 2005) were evaluated. An inventory of designated substances and other potentially hazardous materials present or potentially present was developed.

The DSHMS included the survey of one residential building with an attached mudroom and garage. The building finishes included concrete, brick, wood framing, drywall, vinyl floor tile, acrylic floor tile, wood flooring, and ceiling tiles.

Trace made the following conclusions in the DSHMS:

- Nineteen types of building materials (vinyl floor tiles and attached mastic were submitted as one sample) were submitted for laboratory analysis of asbestos. All six vinyl floor tiles and/or their corresponding mastic, drywall filler in the basement of the site building, and one type of exterior window caulking were found to contain asbestos. At the time of the DSHMS, Trace personnel inspected insulated areas of the attic and did not observe any vermiculite insulation.
- The majority of the interior first floor and exterior paints of the site building were confirmed to be lead containing.
- The survey identified equipment that may have CFCs or ozone-depleting substances (ODS), including a residential refrigerator and an air-conditioning unit. Trace noted that equipment containing CFCs or ODS should be maintained and disposed of in accordance with *Federal Halocarbon Regulations, 2022* (SOR/2022-110) (GOC, 2022) and *O. Reg. 463/10: Ozone Depleting Substances and Other Halocarbons* (as amended) (GO, 2010).
- Fluorescent light fixtures were noted throughout the site building. Trace noted that lighting ballasts should be inspected upon removal to determine if the ballast is PCB-containing and would therefore require proper handling and disposal.
- Small quantities of mercury were identified to be present in the fluorescent light bulbs noted in the site building.
- Silica-containing building materials, including drywall, plaster, poured concrete, and concrete blocks, were observed throughout the site building. Silica is expected to be present as a natural constituent in concrete, stone, various masonry elements, and mortars.

Trace recommended that, during demolition or renovations, BDD representatives and project contractors should ensure that the above-noted materials are properly handled and disposed of in accordance with federal and provincial regulations.

3.1.8.3 Trace Associates Inc. – Limited Phase II Environmental Site Assessment (2025)

The Client retained Trace to conduct a Limited Phase II ESA (Trace, 2025b) at the Phase One Property, based on the results of RWDI's Phase I ESA (RWDI, 2025), which identified one APEC from the former use of an AST for furnace oil in the site building's basement at the Phase One Property, and one APEC for an existing AST on an upgradient property within the Phase One Study Area, at 36 Upper Middle Road (approximately 150 m to the north).



The Limited Phase II ESA was conducted between May 22 and 30, 2025, and consisted of drilling two boreholes equipped with monitoring wells, collecting soil samples, submitting the samples for laboratory analyses, and conducting data interpretation. It was noted that groundwater was not encountered within 6 m of the ground surface but was expected to be encountered deeper within the shale bedrock. As such, a groundwater assessment could not be conducted.

Soil analytical results were compared to the Ministry's site condition standards (SCS) for residential/parkland/institutional property uses, as outlined in the document *Soil, Ground Water and Sediment Standard for Use Under Part XV.1 of the Environmental Protection Act* (MOE, 2011). The Table 1 SCS (background) and Table 2 SCS (potable use) for fine-textured surface soil for residential property use were identified as the appropriate regulatory standards.

The results of the Limited Phase II ESA indicated that all analyzed soil samples met the applied SCS. There was no evidence (i.e., visual observations, odours, or vapour measurements) that would indicate any potential sub-surface impacts from the two APECs previously identified by RWDI in the Phase I ESA. As such, at the time of the Limited Phase II ESA, Trace concluded that no further investigations were recommended.

3.1.8.4 Summary of Previous Environmental Reports

Based on review of the previous environmental reports, two APECs were identified in relation to the use of a former fuel oil AST for an oil heating system in the basement of the building on the Phase One Property, and an AST existing on an upgradient property at 36 Upper Middle Road, approximately 150 m to the north of the Phase One Property. However, based on the results of the Limited Phase II ESA (Trace, 2025b), all soil samples analyzed met the applied Ministry SCS. There was no evidence in the soil samples analyzed that there were any subsurface impacts from the two APECs identified by RWDI in their Phase I ESA (RWDI, 2025).

Other information from the previous environmental reports is presented throughout this Phase One ESA.

3.1.8.5 Potentially Contaminating Activities

Based on the review of the environmental reports for the Phase One Property, PCAs have been identified for the Phase One Property. The noted PCAs are summarized in Table D:

Table D: Summary of Potentially Contaminating Activities Identified in Previous Environmental Reports				
Address	Location	PCAs	Description of Activity	Evaluation as an APEC
1493 Sixth Line	The Phase One Property	#28 Gasoline and Associated Products Storage in Fixed Tanks	A former fuel oil AST for an oil heating system in the basement of the residential dwelling located at the Phase One Property.	No, based on the results of the Limited Phase II ESA (Trace, 2025b).
36 Upper Middle Road	Approximately 150 m north of the Phase One Property	#28 Gasoline and Associated Products Storage in Fixed Tanks	An AST historically located in the basement of the house on the property.	No, based on the separation distance and the results of the Limited Phase II ESA (Trace, 2025b).



3.2 Environmental Source Information

As part of the Phase I ESA, RWDI contracted ERIS to conduct a search of available federal, provincial, and private environmental databases for the Phase One Property and surrounding 250 m (RWDI, 2025). Trace reviewed the ERIS database report provided in the Phase I ESA. Based on the location of the Phase One Property, the database searches were conducted to assist in the identification of environmental conditions at the Phase One Property and on adjacent properties. The significance of the identified actual or potential sources was evaluated based on the details of the database information provided, the separation distance from the Phase One Property, and the location relative to the Phase One Property based on the inferred direction of groundwater flow (upgradient/downgradient).

A summary of the PCAs identified during a review of the ERIS database report is presented in Table E:



Table E: Summary of Potentially Contaminating Activities on the Phase One Property and in the Phase One Study Area as Identified in the Environmental Database Review

Address	Location	PCAs	Occupant	Description of Activity	ERIS Database Source	Evaluation as an APEC
1511 Sixth Line	Adjacent to the northwest of the Phase One Property	#52 Storage, Maintenance, Fuelling and Repair of Equipment, Vehicles and Material Used to Maintain Transportation Systems	Munn's Public School	Hazardous waste generator of waste oils and sludges between 2018 and 2022.	O. Reg. 347 Waste Generators Summary	No, based on the lack of reported spills and results of Phase II ESA activities conducted at the Phase One Property. As a school, it is expected that there are small quantities of waste oils and sludges.
36 Upper Middle Road	150 m north of the Phase One Property (upgradient)	#28 Gasoline and Associated Products Storage in Fixed Tanks	Royal Canadian Legion	Registered with an active AST in 1994.	Commercial Fuel Oil Tanks	No, based on the lack of reported spills and the results of the Phase II ESA activities conducted at the Phase One Property.
1478 Elm Road	76 m southeast of the Phase One Property (downgradient)	Not applicable (N/A) - Spills	Residential	Spill of 80 L of transformer oil in 2011.	Ontario Spills	No, based on the separation distance and downgradient location.
1490 Elm Road	185 m south of the Phase One Property (downgradient)	N/A - Spills	Residential	Spill of 10 L of non-PCB-containing transformer oil to ground in 2014. Soil contamination was confirmed. Spill of 110 L of vault transformer spill due to equipment failure in 2015.	Ontario Spills	No, based on the separation distance and downgradient location.



3.3 Physical Setting Sources

3.3.1 Aerial Photographs

Aerial photographs were reviewed to generally document the development of the Phase One Property and the Phase One Study Area and to identify PCAs and APECs. The aerial photographs reviewed include the earliest available, the most recently available, and others, to document the development of the Phase One Property and the Phase One Study Area.

Trace reviewed aerial photographs from each decade where photographs were available for the Phase One Study Area. Aerial photographs dated 1934, 1954, 1965, 1974, 1985, 2004, 2014, and 2025 were reviewed from a combination of sources, including the Phase I ESA (RWDI, 2025) and Google Earth™. A summary of the information relating to the review of the aerial photographs is presented in Table F. Based on the observations noted below, no additional aerial photographs between the dates listed were reviewed, as no significant changes were observed.



Table F: Summary of Aerial Photographs Reviewed

Date / Scale / Source	Description of the Phase One Property	Phase One Study Area Comments
1934 / 1:10,000 / Trace	The Phase One Property appeared to be vacant, undeveloped land. A tributary of Sixteen Mile Creek was visible along the northern portion of the Phase One Property.	The Phase One Study Area appeared to be primarily vacant land, except for some residential dwellings visible to the south and southeast of the Phase One Property. What is now Sixth Line was visible to the south of the Phase One Property.
1954 / 1:10,000 / Trace	Similar to the 1934 aerial photograph.	Similar to the 1934 aerial photograph, with the exception that a subdivision to the southwest (along what is currently Pembroke Drive, Oxford Avenue, Mansfield Drive, Russel Drive, Mayfield Drive, Oliver Place, Richmond Road, and Ringwood Road) appeared to be in the initial stages of development.
1965 / 1:10,000 / Trace	The Phase One Property appeared to be developed with a single residential dwelling.	The adjacent property to the north-northwest appeared to be occupied by Munn's Public School. White Oaks Secondary School and associated sports fields had been developed east of the Phase One Property.
1974 / 1:10,000 / Trace	Similar to the 1965 aerial photograph.	Additional residential developments were visible to the west, south, and east of the Phase One Property. The Sheridan College Trafalgar Campus appeared to have been constructed northeast of the Phase One Property.
1985 / 1:10,000 / Trace	Similar to the 1974 aerial photograph.	New residential developments appeared to be in the process of construction to the west of the Phase One Property, west of what is now Upper Middle Road. Residential developments appeared to be in the process of construction to the north of the Phase One Property, west of the Sheridan College Trafalgar Campus, and southeast of the Phase One Property, along what is now McCraney Street West. Oakville Park was visible to the northeast of the Phase One Property. A walking trail was visible adjacent to the east of the Phase One Property.
2004 / online / Google Earth™	Similar to the 1985 aerial photograph.	New residential developments were visible further to the north, west, and southwest of the Phase One Property. A multi-tenant commercial building had been constructed adjacent to the west-southwest of the Phase One Property, across Sixth Line.
2014 / online / Google Earth™	Similar to the 2004 aerial photograph.	Similar to the 2004 aerial photograph.
2025 / online / Google Earth™	Similar to the 2014 aerial photograph.	Similar to the 2014 aerial photograph.



Based on the review of the aerial photographs for the Phase One Property and the Phase One Study Area, no PCAs have been identified.

3.3.2 Topography, Hydrology, and Geology

An overview of the geology and hydrogeology of the Phase One Property and surrounding area is provided in Table G to assist in the evaluation of the potential for contaminant migration. Site setting information was obtained from sources as referenced. MECP water well records are available online (<https://www.ontario.ca/page/map-well-records>).

Table G: Summary of the Phase One Property and Surrounding Area Geology and Hydrogeology		
Site Setting	Findings	Source
Topography of the Site and Surrounding Area	The Phase One Property and surrounding areas generally slope slightly to the south, towards Lake Ontario.	Observation
Site Grade Relative to Adjacent Properties	The Phase One Property is level with adjacent properties.	Observation
On-site Surface Water and Flow patterns	Stormwater runoff collected at the Phase One Property is expected to infiltrate the grassed surfaces on the Phase One Property or be directed towards stormwater catchbasins located along Sixth Line, to the south.	Observation
Fill Materials	None, based on the Phase II ESA activities.	Limited Phase II ESA
Subsurface Soil (and depth if available)	Iroquois Plain physiographic region, which contains shallow lacustrine deposits. Stratigraphy encountered during the Phase II ESA activities generally consisted of limited topsoil (0.3 m), over reddish-brown clay (2 to 2.4 m), over weathered red shale bedrock. Slightly wet soil was observed occasionally at approximately 1.5 m below ground surface (mbgs).	1:1,000,000 Scale Quaternary Geology, Seamless Coverage of the Province of Ontario, Ontario Geological Survey, Data Set 14 – Revised (OGS, 2000) Map 2715, Physiography of Southern Ontario, published by Geology Ontario (Chapman & Putnam, 1984) Limited Phase II ESA
Bedrock Type (and depth if available)	Weathered shale was observed between 2.1 mbgs and 2.4 mbgs during the Limited Phase II ESA. The weathered shale was reddish brown in colour.	1:250,000 Scale Bedrock Geology of Ontario; Ontario Geological Survey, Miscellaneous Release – Data 126 – Revision 1 (OGS, 2011) Limited Phase II ESA
Nearest Surface Waterbody	Munns Creek is 300 m to the south and Lake Ontario is 4.4 km to the south. A tributary of Sixteen Mile Creek exists in the northern portion of the Phase One Property.	The Atlas of Canada – Toporama (https://atlas.gc.ca/toporama/en/index.html) Google Earth™ Observation



Table G: Summary of the Phase One Property and Surrounding Area Geology and Hydrogeology

Site Setting	Findings	Source
Inferred Depth to Shallow Groundwater	Depth to groundwater was measured by Trace personnel at approximately 5.9 mbgs at the Phase One Property in December 2025.	December 2025 groundwater sampling activities (report provided under separate cover)
Inferred Shallow Groundwater Flow Direction	Based on proximity to local waterbodies, shallow groundwater flow direction is inferred to be generally to the south, following the topography of the land towards Munn Creek, approximately 300 m south, and Lake Ontario further to the south. The direction of shallow groundwater flow may be locally influenced by roadways, buried utilities, and geology.	Observation
Nearest Water Well	Two monitoring wells were installed at the Phase One Property during the Phase II ESA activities. Stratigraphy encountered during the Phase II ESA activities generally consisted of limited topsoil (0.3 mbgs), over reddish-brown clay (2.0 to 2.4 mbgs), over weathered red shale bedrock. Slightly wet soil was observed occasionally at approximately 1.5 mbgs.	Observation Limited Phase II ESA
Nearest Water Supply Well	Two water supply wells were installed at the adjacent property to the east-southeast of the Phase One Property in 1951 and 1952.	MECP Water Well Records
Other Pertinent Features (e.g., gas/oil wells)	None.	-

3.3.3 Fill Materials

Fill material composition and source location are considerations in determining whether environmental concerns are present. The Phase One Property slopes down to the south. The Phase One Property is graded relatively evenly with all adjacent properties and generally follows the natural topography of the surrounding area.

Based on the activities of the Limited Phase II ESA (Trace, 2025b), which included a borehole drilling investigation, a significant amount of fill was not encountered at the Phase One Property. Stratigraphy encountered during the installation of the groundwater monitoring wells generally consisted of limited topsoil (0.3 mbgs), over reddish-brown clay (2.0 to 2.4 mbgs), over weathered red shale bedrock. Slightly wet soil was observed occasionally at approximately 1.5 mbgs.

3.3.4 Waterbodies and Areas of Natural Significance

As discussed in Section 3.3.2, the closest permanent waterbody to the Phase One Property is a tributary of Sixteen Mile Creek that exists in the northern portion of the Phase One Property. Munn's Creek is also



located approximately 300 m south of the Phase One Property, and Lake Ontario is located approximately 4.4 km to the south.

As part of the Phase I ESA (RWDI, 2025), the Town of Oakville's Official Plan was reviewed, and no Significant Woodlands, Significant Valley Lands, or Significant Wetlands (areas designated as environmentally sensitive) are located within the Phase One Study Area; however, the woodlands at and adjacent to the Phase One Property are supportive of biodiversity.

Trace reviewed the MNR Natural Heritage Areas interactive map (https://www.lioapplications.lrc.gov.on.ca/Natural_Heritage/index.html?viewer=Natural_Heritage.Natural_Heritage&locale=en-CA), which indicated that no areas of natural and scientific interest (ANSIs), Conservation Reserves, or Provincial Parks are located within the Phase One Study Area. No wetlands with provincial significance are located within 30 m of the Site.

Soil samples collected at the Site during the Limited Phase II ESA (Trace, 2025b) contained pH levels that met the criteria for both surface and subsurface soil conditions. As such, the Site is not considered environmentally sensitive, as defined in O. Reg. 153/04, Section 41 (as amended) (GO, 2004).

Several species at risk were identified to be potentially located within the Phase One Study Area; however, no significant habitat was observed to be located within the Phase One Study Area, other than Munn's Creek. The park located to the north-northeast of the Phase One Property may also be home to species at risk.

The MNR's Natural Heritage Areas interactive map includes species-at-risk records, which indicated that the species in Table H are potentially present within 1.0 km of the Phase One Property:

Table H: Species at Risk	
Endangered	
<i>Clinostomus elongatus</i> (Redside Dace)	<i>Melanerpes erythrocephalus</i> (Red-Headed Woodpecker)
Threatened	
<i>Chaetura pelagica</i> (Chimney Swift)	<i>Botaurus exilis</i> (Least Bittern Mixed)

3.3.5 Well Records

Well records can be used to determine the hydrogeological and geological characteristics of the Phase One Study Area.

Based on a review of MECP Water Well Information System (WWIS) (<https://www.ontario.ca/page/map-well-records>) conducted in the Phase One ESA (RWDI, 2025), there are records for three water wells located in the Phase One Study Area. Two of the records are for water supply wells to 8.23 mbgs and 12.72 mbgs, installed in 1951 and 1952, respectively. An observation well was installed in 1971 in the Phase One Study Area. The MECP does not represent or guarantee that well record information is current, accurate, or complete, and assumes no responsibility for errors or omissions.

3.4 Site Operating Records

No site operating records for the historical operations at the Phase One Property were available for review as part of this Phase One ESA.



4.0 INTERVIEWS

Table I summarizes the interviews conducted as part of this Phase One ESA:

Table I: Interview Records					
Name	Place	Method	Date	Reason	Relevant Information Provided
Ben Wallace	The Phase One Property	Direct interview, questions	January 28, 2026	Ben is the Development Manager of the Phase One Property and has been familiar with the property since it was purchased in 2025.	Information obtained from Ben is presented throughout Section 5.0 of this report, as appropriate.

5.0 SITE RECONNAISSANCE

5.1 General Requirements

The site visit occurred after the preliminary records review was conducted. The site visit was conducted at 1493 Sixth Line, on January 28, 2026, between 1:00 p.m. and 2:00 p.m., by Barbara Voutos of Trace. Weather conditions during the site visit consisted of mixed sun and cloud, with temperatures around -20°C. During the site visit, Barbara conducted a walkthrough of the Phase One Property and made visual observations of properties within the Phase One Study Area from 1493 Sixth Line and surrounding public roadways (i.e., without entering the properties). Ben Wallace, a Development Manager for the owner (i.e., the Client) was interviewed.

Photographs taken during the site visit are provided in Appendix B.

5.2 Specific Observations at the Phase One Property:

5.2.1 Property and Structures

The Phase One Property is municipally addressed as 1493 Sixth Line and is a generally a flat, rectangularly shape parcel measuring approximately 0.81 ha (2 acres) in size, located in the east-central portion of Oakville, Ontario. At the time of the site visit, the Site was occupied by a two-story residential building with a small basement, in the northwestern portion of the property, with a gravel driveway leading from Sixth Line. Two additional sheds were also noted on the property at the time of the site visit. The majority of the property (northern and eastern portions) is covered with trees.

5.2.2 Site Operations

At the time of the site visit, the Phase One Property was developed with a vacant residential dwelling. Upon arrival, it was immediately apparent that the residential dwelling had sustained extensive damage. Multiple windows were broken and there was significant damage to the interior walls and flooring, consistent with signs of forced entry and/or vandalism.

The basement of the residential dwelling was heavily flooded, with several feet of standing water visible. On the main floor, the kitchen sink was actively discharging water onto the floor, resulting in substantial overflow. This had caused ice to form across the kitchen, floor, cabinets, and surrounding surfaces.



Additionally, a pipe near the main-floor bathroom was actively leaking, contributing to further water accumulation and ice formation on adjacent walls and flooring.

Due to the extent of the flooding, active leaks, and ice coverage throughout the affected areas, detailed observation of the interior conditions was significantly limited and, in some sections, not safely accessible. As a result, and based on confirmation from the Client that no modifications to the interior or exterior of the property had been made since the Phase I ESA (RWDI, 2025), Trace personnel relied on the visual observations made and reported in the findings of the Phase I ESA to inform this report.

5.2.3 Utility Services

Electricity is supplied by Oakville Hydro Electricity via overhead wires to the residential dwelling. Transformers were observed on the utility poles located along Sixth Line, adjacent to the south. Natural gas supply is provided by Enbridge Gas via underground piping. The residential dwelling was historically heated with furnace oil following the use of coal for heating. Site personnel indicated that an oil-fired boiler was previously used to heat the residential dwelling and that fuel was historically stored in an AST situated in the basement. Reportedly, the AST had been removed prior to the Phase I ESA (RWDI, 2025). As a result of the flooding occurring in the basement at the time of the 2026 site visit, Trace personnel could not observe the boiler heating system.

Municipal potable water and sanitary sewers are provided by Halton Region to the Phase One Property via underground piping. Site personnel were not aware of any potable water supply wells located on the Phase One Property. No evidence of on-site potable water supply wells was observed by Trace personnel during the site visit. Two monitoring wells are present at the Phase One Property, installed during the Limited Phase II ESA (Trace, 2025b). Due to extensive snow cover, only one of these monitoring wells was observed by Trace personnel at the time of the site visit.

5.2.4 Stormwater

Based on information provided by site personnel and observations made during the site visit, stormwater runoff collected on the ground surfaces is expected to infiltrate the gravel driveway and grassed surfaces on the Phase One Property or be directed to catchbasins on Sixth Line.

Site personnel were not aware of any sampling and chemical analysis of the stormwater discharges from the Phase One Property, or any stormwater quality concerns associated with the Phase One Property or on-site operations.

5.2.5 Floor Drains, Pits, and Sumps

The presence of floor drains, pits, and sumps was investigated by Trace personnel through observations made during the site visit and discussions with site personnel. No floor drains, pits, or sumps were observed by Trace personnel.

5.2.6 Wastewater/Sewers

According to site personnel, the wastewater currently generated at the Phase One Property is limited to domestic wastewater from the washroom and sinks. The wastewater generated from the washroom and sinks reportedly discharges to the municipal sanitary sewer system.



Site personnel were not aware of any monitoring of the sanitary sewer effluent by any government agency, or any infractions of the sewer use by-law pertaining to site operations.

5.2.7 Underground Storage Tanks

According to site personnel and based on observations made by Trace personnel, there are no active or inactive USTs located on the Phase One Property. Additionally, no USTs have historically been owned or operated at the Phase One Property to their knowledge. At the time of the site visit, no physical evidence suggesting the presence of any on-site USTs (e.g., vent pipes, fill pipes, etc.) was observed by Trace personnel.

Trace contacted the TSSA to obtain information with respect to the potential storage of petroleum fuels on the Phase One Property and to determine if there have been any infractions of provincial regulations concerning the storage of petroleum or associated products. The TSSA indicated that the site is not registered for the operation of any USTs.

5.2.8 Above-ground Storage Tanks

Based on observations made by Trace personnel and discussions with site personnel, no chemical storage ASTs were present on the Phase One Property at the time of the site visit. According to site personnel, a fuel AST was historically located in the basement of the residential dwelling, used for the former oil-fired boiler heating system. Reportedly, the AST had been removed prior to the Phase I ESA (RWDI, 2025). As a result of the flooding occurring in the basement at the time of the 2026 site visit, Trace personnel could not observe the boiler heating system.

The TSSA has no record of any fuel-related ASTs being present at the Phase One Property.

5.2.9 Chemicals / Raw Materials Use and Storage

At the time of the site visit, Trace personnel did not observe any chemicals or chemical storage at the Phase One Property.

5.2.10 Chemical Spills/Releases

At the time of the site visit, Trace did not observe any evidence of chemical spills or releases. However, given the condition of the interior of the residential dwelling and the snow-covered exterior of the property, visual observations were limited. According to site personnel, no chemical spills/releases have occurred at the Phase One Property. No observations of chemical spills/releases were noted during the DSHMS (Trace, 2025a) or Limited Phase II ESA (Trace, 2025b).

5.2.11 Solid Waste

Based on discussions with site personnel and observations made by Trace personnel, the residential dwelling is vacant, and no solid wastes are currently generated at the Phase One Property.

No evidence of on-site solid waste burial was observed by Trace personnel at the time of the site visit. Site personnel stated that, to their knowledge, no solid wastes have been disposed of on the Phase One Property.



5.2.12 Hazardous/Subject Waste Management

According to a review of the O. Reg. 347 Waste Generators Summary database (contained in the ERIS report provided as part of the Phase I ESA (Trace, 2024), the Phase One Property is not currently registered as a generator of subject wastes.

5.2.13 Air Emissions

Based on information provided by site personnel and observations made by Trace personnel, air emission sources at the Phase One Property are currently limited to a wood-fired fireplace and an air-conditioning unit.

Based on discussions with site personnel and observations made by Trace personnel at the time of the site visit, the historical and current air emission sources are not interpreted as potential sources of soil and/or groundwater impact on the Phase One Property.

5.2.14 Designated Substances and Special Attention Items

Asbestos-containing Materials

The presence of ACMs at the Phase One Property was investigated through observations made by Trace personnel and through discussions with persons knowledgeable about the Phase One Property. An ACM survey was not conducted as part of this Phase One ESA; however, Trace conducted a DSHMS in July 2025. Nineteen types of building materials (vinyl floor tiles and attached mastic were submitted as one sample) were submitted for laboratory analysis of asbestos, and all six vinyl floor tiles and/or their corresponding mastic, drywall filler in the basement, and one type of exterior window caulking were found to contain asbestos (Trace, 2025a). At the time of the DSHMS, Trace personnel also inspected insulated areas of the attic and did not observe any vermiculite insulation.

No intrusive investigations were conducted by Trace personnel during this Phase One ESA to examine areas of concealed space for the presence of ACMs, and as such, additional potential or actual ACMs may be present in areas not accessible to Trace personnel during the site visit.

Polychlorinated Biphenyls

According to site personnel and based on observations made by Trace personnel, no PCBs are known to be used or stored at the Phase One Property.

During the 2025 site visit, RWDI observed self-ballasted lighting fixtures in the basement of the residential dwelling (RWDI, 2025). As a result of the flooding occurring in the basement at the time of the 2026 site visit, Trace personnel could not inspect the condition of the basement light fixtures. At the time of the 2025 Phase I ESA, RWDI did not comment on the functionality of these lights.

The lights on the main floor that were observed by Trace personnel appeared to be functional and, even if PCB containing, are not interpreted to represent a potential significant environmental impairment liability.

Lead-based Paints

The presence of lead-based paints at the Phase One Property was investigated through observations made by Trace personnel and through discussions with site personnel. Due to the condition of the interior of the



site building, Trace was not able to observe painted surfaces in detail. A lead-based paint survey was not conducted as part of this Phase One ESA and no samples were collected. However, Trace investigated lead-based paints as part of the DSHMS in July 2025. Results indicated that the majority of the interior first floor and exterior paints were confirmed to be lead containing (Trace, 2025a).

Exposure to lead is regulated during demolition activities under O. Reg. 490/09 (GO, 2020). Workers are not at risk of being exposed to lead unless they are undertaking an activity that disturbs surfaces covered with a lead-based coating. The MLITSD's *Guideline – Lead on Construction Projects* (MLITSD, 2004) should be consulted to determine worker protection based on surface coating disturbance or removal techniques.

Ozone-depleting Substances – Chlorofluorocarbons

Based on discussions with site personnel and observations made by Trace personnel during the site visit, equipment potentially CFCs identified at the Phase One Property was limited to a residential refrigerator and an air-conditioning unit. Even if CFC containing, the on-site equipment is not interpreted to represent potential significant environmental impairment liability.

Urea Formaldehyde Foam Insulation

The presence of UFFI at the Phase One Property was investigated through observations made by Trace personnel and through discussions with site personnel. A survey for UFFI was not conducted as part of this Phase One ESA.

Site personnel were unaware of a survey for UFFI or monitoring for the presence of formaldehyde vapours having been conducted at the Phase One Property. No potential UFFI was observed by Trace personnel at the time of the site visit. No intrusive investigations were conducted by Trace personnel to examine areas of concealed space for the presence of UFFI, and as such, additional potential or actual UFFI may be present in areas not accessible to Trace personnel during the site visit.

Mercury

The presence of mercury at the Phase One Property was investigated through observations made by Trace personnel and through discussions with site personnel.

Small quantities of mercury are likely present inside the fluorescent light bulbs throughout the residential dwelling and possibly in the thermostats and electrical switches. Even if mercury containing, these are not interpreted to represent a potential significant environmental impairment liability.

Mould and Water Damage

The presence of possible mould and water damage at the Phase One Property was investigated through visual observations made by Trace personnel and through discussions with site personnel. Due to the flooding in the basement and the sink overflowing onto the kitchen floor, there is likely significant water damage to the residential dwelling. Depending for how long the flooding has occurred and how quickly cleanup can begin, there is also a potential risk of mould growth.



Ionizing Radiation and Radon Gas

According to site personnel, the building at the Phase One Property has not used any ionizing sources of radiation in its operations. No radiation sources were observed by Trace personnel during the site visit. Site personnel were unaware of any radon gas testing having been conducted at the Phase One Property.

5.3 Written Description of Investigation

PCAs identified during the site visit include the following:

- The property municipally addressed as 1500 Sixth Line, located adjacent to the west-southwest, across Sixth Line, was identified as a multi-tenant commercial property since 1985. As identified in the city directories summarized in the Phase I ESA (Trace, 2024), Sketchley Cleaners had been a tenant at this property from 1996 to 2023. At the time of the site visit, Trace personnel observed that this unit was occupied by The Clothespin, identified as a dry cleaner, laundry service, and alterations facility. Dry-cleaning facilities are classified as PCA #37 – Operation of Dry-cleaning Equipment (Where Chemicals Are Used).
- The property municipally addressed as 1511 Sixth Line, adjacent to the north-northwest (upgradient), was occupied by Munn’s Public School and is listed as a hazardous waste generator of waste oils/sludges between 2018 and 2022, which represents PCA #52 Storage, Maintenance, Fuelling and Repair of Equipment, Vehicles and Material Used to Maintain Transportation Systems.
- The property municipally addressed as 36 Upper Middle Road, 150 m north of the Phase One Property, occupied by the Royal Canadian Legion, is registered with an active fuel AST, which represents PCA #28 Gasoline and Associated Products Storage in Fixed Tanks.
- The property municipally addressed as 1478 Elm Road, 76 m southeast of the Phase One Property was listed with a spill of 80 L of transformer oil in 2011, which represents PCA #N/A – Spills.
- The property municipally addressed as 1490 Elm Road, 185 m south of the Phase One Property, was listed with a spill of 10 L of non-PCB transformer oil to the ground in 2014 and 110 L of transformer oil to the ground in 2015, which represents PCA #N/A – Spills.
- Various municipal roadways were observed in the Phase One Study Area (notably the RoW for Sixth Line), to the south of the Phase One Property. The municipal roadways in the Phase One Study Area are subject to de-icing activities for the safety of vehicular or pedestrian traffic under snow and/or ice conditions, which represents PCA #N/A – Application of Road Salt for De-icing Activities.
- A pole-mounted transformer was observed in the RoW adjacent to the south of the Phase One Property, along Sixth Line, which represents PCA #55 Transformer Manufacturing, Processing and Use.

6.0 REVIEW AND EVALUATION OF INFORMATION

6.1 Current and Past Uses

The current and past uses of the Phase One Property are presented in Table J:



Table J: Current and Past Uses of the of the Phase One Property				
Year	Owner	Description of Property Use	Property-use Classification	Other Observations from Aerial Photographs, FIPs, etc.
1493 Sixth Line - PIN: 24010303201360000000				
Prior to 1849	Crown	Undeveloped	Agricultural or other use	No additional information available.
1849	John A. Chisholm	Undeveloped	Agricultural or other use	No additional information available.
1849 to 1854	Charles Culham, John Culham	Undeveloped	Agricultural or other use	No additional information available.
1854 to 1894	Charles Culham	Undeveloped	Agricultural or other use	No additional information available.
1894 to 1896	Ephraim Smith	Undeveloped	Agricultural or other use	No additional information available.
1896 to 1905	Anne Jane Furness	Undeveloped	Agricultural or other use	No additional information available.
1905	Clara Helena Furness	Undeveloped	Agricultural or other use	No additional information available.
1905 to 1909	Peter Syderham Furness	Undeveloped	Agricultural or other use	No additional information available.
1909 to 1913	The Provident Investment Company	Undeveloped	Agricultural or other use	No additional information available.
1913 to 1922	Herbert Caplin Cox	Undeveloped	Agricultural or other use	No additional information available.
1922 to 1932	Hugh S. Wilson	Undeveloped	Agricultural or other use	No additional information available.
1932 to 1947	Ryland H. New	Undeveloped	Agricultural or other use	No additional information available.
1493 Sixth Line - PIN: 24010303201360000000				
1947 to 1980	Burnet K. Snider	Residential	Residential	Based on previous environmental reports and review of aerial photographs, the Phase One Property appeared to have been developed with a residential dwelling circa the 1950s.
1980 to 1993	Barbara Post	Residential	Residential	Residential dwelling, with associated gravel driveway.
1993 to 1997	Maurice Andrew Post, Barbara Betty Post	Residential	Residential	Residential dwelling, with associated gravel driveway.
1997 to 2022	Barbara Betty Post	Residential	Residential	Residential dwelling, with associated gravel driveway.



Table J: Current and Past Uses of the of the Phase One Property				
Year	Owner	Description of Property Use	Property-use Classification	Other Observations from Aerial Photographs, FIPs, etc.
2022 to 2025	Elizabeth Robin Post, Lynda Joan Funk	Residential	Residential	Residential dwelling, with associated gravel driveway.
2025	Penalta Group Inc.	Residential	Residential	Vacant, unoccupied residential dwelling, with associated gravel driveway.

6.2 Potentially Contaminating Activities

The PCAs identified at the Phase One Property based on the historical and current site data are summarized in Table K:

Table K: Summary of Potentially Contaminating Activities on the Phase One Property			
Address	Location	PCA	Evaluation as an APEC
1493 Sixth Line	The Phase One Property	#28 Gasoline and Associated Products Storage in Fixed Tanks	Former fuel oil AST for an oil heating system in the basement of the residential dwelling located on the Phase One Property.

The PCAs identified in the Phase One Study Area based on the historical and current site data are presented in Table L:

Table L: Summary of Potentially Contaminating Activities in the Phase One Study Area			
Address	Location	PCAs	Evaluation as an APEC
36 Upper Middle Road	Approximately 150 m north of the Phase One Property (upgradient)	#28 Gasoline and Associated Products Storage in Fixed Tanks	No, based on the lack of reported spills and results of the Phase II ESA activities conducted at the Phase One Property.
1478 Elm Road	76 m southeast of the Phase One Property (downgradient)	N/A - Spills	No, based on the separation distance and downgradient location.
1490 Elm Road	185 m south of the Phase One Property (downgradient)	N/A - Spills	No, based on the separation distance and downgradient location.
Sixth Line	Adjacent roadways to the south of the Phase One Property (downgradient)	N/A – Application of Road Salt for De-icing Activities #55 Transformer Manufacturing, Processing and Use	No, based on the downgradient location.
1500 Sixth Line	Adjacent to the west-southwest of the Phase One Property, across Sixth Line	#37 Operation of Dry-cleaning Equipment (Where Chemicals Are Used)	No, based on the downgradient location, lack of reported spills, and no evidence of solvent use.



Table L: Summary of Potentially Contaminating Activities in the Phase One Study Area

Address	Location	PCAs	Evaluation as an APEC
1511 Sixth Line	Adjacent to the northwest of the Phase One Property	#52 Storage, Maintenance, Fuelling and Repair of Equipment, Vehicles and Material Used to Maintain Transportation Systems	No, based on the lack of reported spills and results of the Phase II ESA activities conducted at the Phase One Property.

6.3 Areas of Potential Environmental Concern

No additional APECs have been identified at the Phase One Property or the Phase One Study Area. The previously identified APECs, relating to historical activities at the Phase One Property and in the Phase One Study Area, were investigated in the Limited Phase II ESA (Trace, 2025b) and the groundwater sampling activities conducted in December 2025 (report provided under separate cover), which confirmed that no soil or groundwater issues are known.

The APECs historically identified at the Phase One Property are shown on Figure 4. The APECs historically identified at the Phase One Property with their associated PCAs are shown on Figure 5.

6.4 Phase One Conceptual Site Model

A conceptual site model (CSM) was prepared as part of this Phase One ESA. A description of the Phase One CSM is provided below and summarized in the referenced figures.

The location of the Phase One Property and the Phase One Study Area, including property boundaries, roadways, and buildings, is shown on Figure 1. Details of the Phase One Property are shown on Figure 2. The land use and occupants on the adjacent neighbouring properties to the Phase One Property are shown on Figure 3.

The Phase One Property is generally flat, with a slight slope down to the south. The Phase One Property is graded evenly with adjacent properties. The Phase One Property is a generally a flat, rectangularly shaped parcel measuring approximately 0.81 ha (2 acres) in size, located in the east-central portion of Oakville, Ontario. At the time of the site visit, the Phase One Property was occupied by a two-story residential building with a small basement in the northwestern portion of the property, with a gravel driveway leading from Sixth Line. Two additional sheds were also noted on the property at the time of the site visit. The majority of the property (northern and eastern portions) is covered with trees.

6.5 Potentially Contaminating Activities

According to information obtained through the historical documents and the environmental database review provided in the Phase I ESA (Trace, 2024), 1493 Sixth Line was originally developed with a residential dwelling circa the 1950s.

One PCA was identified to be associated with the Phase One Property, as listed in Table K (in Section 6.2). There were six additional properties, former properties, or other areas with no municipal address identified as having PCAs within the Phase One Study Area. The PCAs identified in the Phase One Study Area are listed in Table L (in Section 6.2).

PCAs identified in the Phase One Study Area are shown on Figure 3.



6.6 Areas of Potential Environmental Concern

Any potential APECs were investigated through an evaluation of information relating to the Phase One Property and the Phase One Study Area. APECs for the Phase One Property would result from the PCAs identified at the Phase One Property and within the Phase One Study Area. Based on an evaluation of all available information, two APECs were previously identified on the Phase One Property relating to historical activities at the Phase One Property and in the Phase One Study Area (RWDI, 2025). These APECs were investigated in the Limited Phase II ESA (Trace, 2025b), confirming that no soil or groundwater issues are known.

6.7 Phase One Study Area Geology and Hydrogeology

The closest permanent waterbody to the Phase One Property is a tributary of Sixteen Mile Creek, Munn's Creek, which is approximately 300 m to the south of the Phase One Property. Sixteen Mile Creek is also located approximately 1.2 km to the south of the Phase One Property. Lake Ontario is 4.5 km to the southeast of the Phase One Property. The topography gently follows the surface water features to the south.

Based on review of the MNR Natural Heritage Areas interactive map (https://www.lioapplications.lrc.gov.on.ca/Natural_Heritage/index.html?viewer=Natural_Heritage.Natural_Heritage&locale=en-CA), no ANSIs, Conservation Reserves, or Provincial Parks are located within the Phase One Study Area.

Based on the review of the Town of Oakville Official Plan conducted as part of the Phase I ESA (RWDI, 2025), no Significant Woodlands, Significant Valley Lands, or Significant Wetlands are located within the Phase One Study Area; however, the woodlands at and adjacent to the Phase One Property are supportive of biodiversity.

Based on review of MECP WWIS (<https://www.ontario.ca/page/map-well-records>) conducted as part of the Phase I ESA (RWDI, 2025), there are records for three water wells located in the Phase One Study Area. Two of the records are for water supply wells to 8.23 mbgs and 12.72 mbgs, installed in 1951 and 1952, respectively. An observation well was installed in 1971 in the Phase One Study Area.

During the drilling activities conducted as part of the Limited Phase II ESA (Trace, 2025b), the shallow geology of the boreholes advanced at the Phase One Property generally consisted of limited topsoil (0.3 mbgs), over reddish-brown clay (2.0 to 2.5 mbgs), over weathered red shale bedrock. Slightly wet soil was observed occasionally at approximately 1.5 mbgs. No evidence of odours or staining was observed in the soil samples.

6.8 Factors Influencing Contaminant Distribution

It is possible that geology, area roadways, and buried utilities such as sanitary and storm sewer lines in the vicinity of the Phase One Property may influence the migration of shallow contaminants, if present. It is not anticipated that meteorological or climatic factors would impact the migration of soil impacts across the Phase One Property.

6.9 Uncertainties

The data for the Phase One Property and the Phase One Study Area was reviewed and uncertainties identified. The uncertainties that could affect the validity of the CSM are presented in Table M:



Table M: Summary of Phase One Environmental Site Assessment Uncertainty

Uncertainty	Description	Effect
Records review	Due to the scale of some of the available aerial photographs, specific details within the Phase One Study Area could not be discerned.	Based on the history of the Phase One Study Area and the available records, this is not considered to significantly impact the conclusions of this Phase One ESA.
Condition of the Phase One Property	Due to the flooding and damage observed within the residential dwelling on the Phase One Property, specific details regarding the condition of the building materials within the residential dwelling could not be discerned.	Based on the detailed observations reported in the Phase I ESA (RWDI, 2025) and confirmation from site personnel that no changes had been made to the interior or exterior of the Phase One Property since RWDI's Phase I ESA, this is not considered to significantly impact the conclusions of this Phase One ESA.

7.0 SUMMARY AND CONCLUSIONS

This Phase One ESA was conducted in accordance with *O. Reg. 153/04: Records of Site Condition* (GO, 2004).

As described in *O. Reg. 153/04*, the objectives of this Phase One ESA were to develop a preliminary determination of the likelihood that one or more contaminants have affected any land or water on, in, or under the Phase One Property, to determine the need for a Phase Two ESA, and to provide a basis for carrying out any Phase Two ESA required.

Trace understands that the Client currently owns the Phase One Property. The intent of this Phase One ESA was to conduct it in general accordance with the requirements of *O. Reg. 153/04*, to support the development application required by the Town of Oakville.

During the normal course of obtaining an RSC for the Phase One Property under *O. Reg. 153/04*, any APECs identified would be required to be investigated to support this Phase One ESA and its findings and the filing of the RSC with the Ontario MECP. Based on the findings of this Phase One ESA, no APECs were identified to be associated with the Phase One Property or Phase One Study Area. The previously identified APECs, discussed in Section 3.1.8 in previous environmental reports, were investigated during the Limited Phase II ESA (Trace, 2025b) and the groundwater sampling activities conducted in December 2025 (report provided under separate cover), which indicated that there were no soil or groundwater impacts to the Phase One Property associated with the identified APECs.

Should an RSC be required, based on review of the information available for the Phase One Property and the Phase One Study Area, a Phase Two ESA is required before an RSC may be submitted with respect to all or part of the Phase One Property.

The overall conclusions of the Phase One ESA are as follows:

- The Phase One Property consists of one property municipally addressed as 1493 Sixth Line, in Oakville, Ontario. According to the Zoning By-law No. 2014-014 (TOO, 2014), the Phase One Property is zoned as a "Natural Area." Section 13.2 of the Zoning By-law No. 2014-014 states that permitted uses within the "Natural Area" zoning designation are limited to conservation, private and public parks, and stormwater management facilities, and that no habitable buildings or habitable structures shall be permitted. It is understood that a change of zoning is underway with the Town of Oakville.



- The Phase One Property is currently developed with a single residential dwelling. The residential dwelling is not currently occupied.
- Based on proximity to local waterbodies, shallow groundwater flow direction is inferred to be generally to the south, following the topography of the land towards Munn's Creek, approximately 300 m south, and Lake Ontario further to the south. It is noted that this shallow groundwater flow direction may not be representative of the shallow groundwater flow direction outside the investigated area, as the direction of shallow groundwater flow may be locally influenced by buried utilities, geology, and surface structures (e.g., roadways or buildings).
- A Phase Two ESA is required prior to the filing of an RSC; however, an RSC is not required at this time. A Phase Two ESA has been prepared by Trace and provided under separate cover.
- PCAs were identified on the Phase One Property and in the Phase One Study Area.
- Two APECs were identified on the Phase One Property relating to historical activities at the Phase One Property and in the Phase One Study Area. The APECs were investigated in the Limited Phase II ESA (Trace, 2025b) and the groundwater sampling activities conducted in December 2025 (report provided under separate cover), which indicated that there were no soil or groundwater impacts to the Phase One Property associated with the identified APECs.

7.1 Record of Site Condition Based on Phase One Environmental Site Assessment Alone

Based on a review of the information available for the Phase One Property and the Phase One Study Area, it has been determined that an RSC will not be filed based on this Phase One ESA alone.

8.0 LIMITATIONS OF REPORT

This report is based solely on the conditions which existed on site at the time of the assessment. The Client, and any other parties using this report with the express written consent of the client and Trace, acknowledges that conditions affecting the environmental assessment of the Phase One Property and the Phase One Study Area can vary with time, and that the conclusions and any recommendations set out in this report are time sensitive.

The Client, and any other party using this report with the express written consent of the Client and Trace, also acknowledges that the conclusions and recommendations set out in this report are based on limited observations and testing on the Phase One Property and the Phase One Study Area, and that conditions may vary across the site which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making any recommendations with respect to the purchase, sale, investment, or development of the Phase One Property, the decisions on which are the sole responsibility of the Client.



9.0 CLOSURE AND QUALITY MANAGEMENT

As a QP, I confirm that this Phase One ESA was conducted in general accordance with the requirements identified in O. Reg. 153/04 (GO, 2004) and that the findings and conclusions are appropriate. We trust this meets your requirements. Should you have any questions or comments, please contact the undersigned.

Respectfully submitted,
Trace Associates Inc.

06-Feb-2026

06-Feb-2026

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Qualified Person / Reviewed by:
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Partner / Principal Engineer

BV/sc



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Figures

900-0494-03.R01 - RSC - F01.R00.V01 - Site Location Map Date and Time Saved: Feb. 03, 2026 2:48 PM Drawn By: jvanderwoude Reviewed By: BV Version: 0



Site Location Map

Penalta Group Ltd.
Phase One Environmental Site Assessment
Record of Site Condition

1493 Sixth Line, Oakville, Ontario
 Trace Project No. 900-0494-03

Legend

- RSC Site Boundary
- Highway
- Major Road
- Local Street
- Watercourse Permanent
- Watercourse Intermittent
- RSC 250-m Buffer
- Phase One Study Area



Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
2. Base Features: Ontario Provincial Mapping, National Railway Network
3. Base Image: ESRI World Wayback Imagery, 2023
4. Inset Image: ESRI World Topographic Map

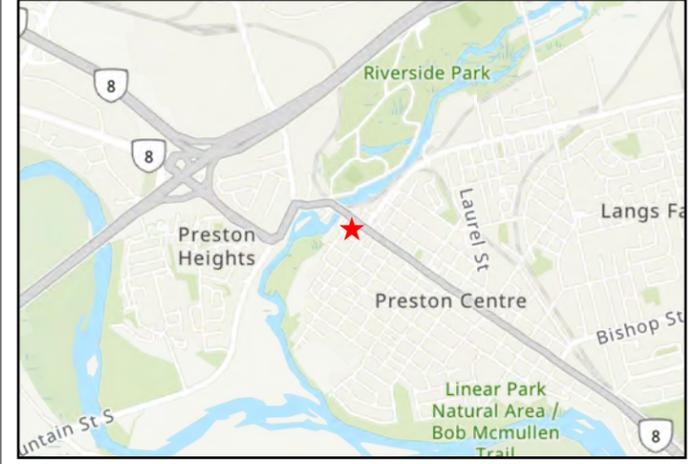
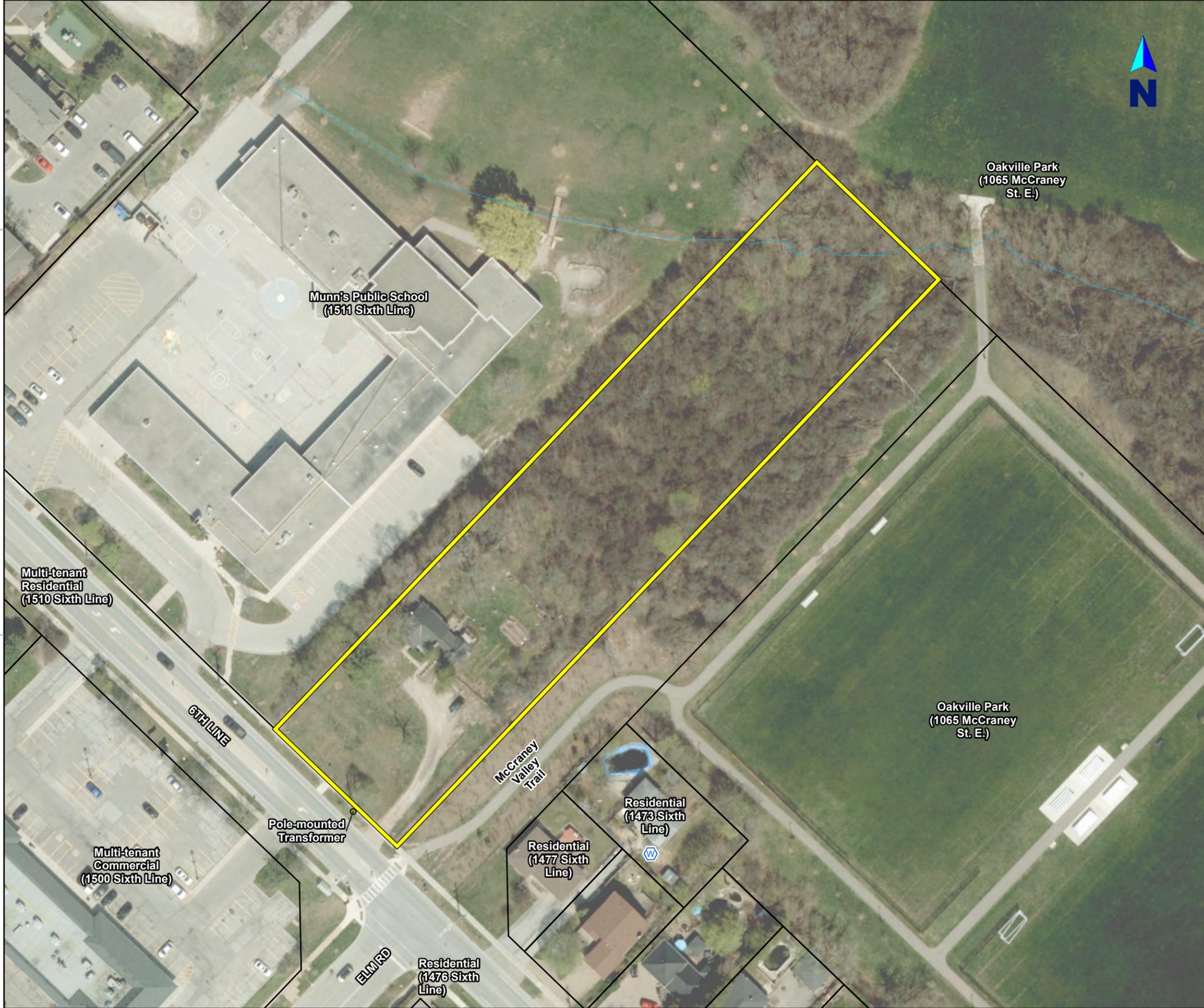


Figure No.
1

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Site Plan

Penalta Group Ltd.
 Phase One Environmental Site Assessment
 Record of Site Condition

1493 Sixth Line, Oakville, Ontario
 Trace Project No. 900-0494-03

Legend

- RSC Site Boundary
- Property Boundaries
- Water Well
- Watercourse Intermittent



Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
2. Base Features: Ontario Provincial Mapping, National Railway Network
3. Base Image: ESRI World Wayback Imagery, 2022
4. Inset Image: Canada Base Map - Transportation

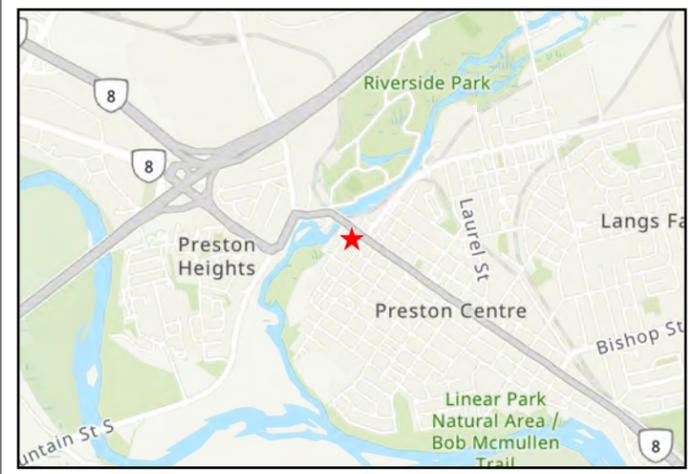
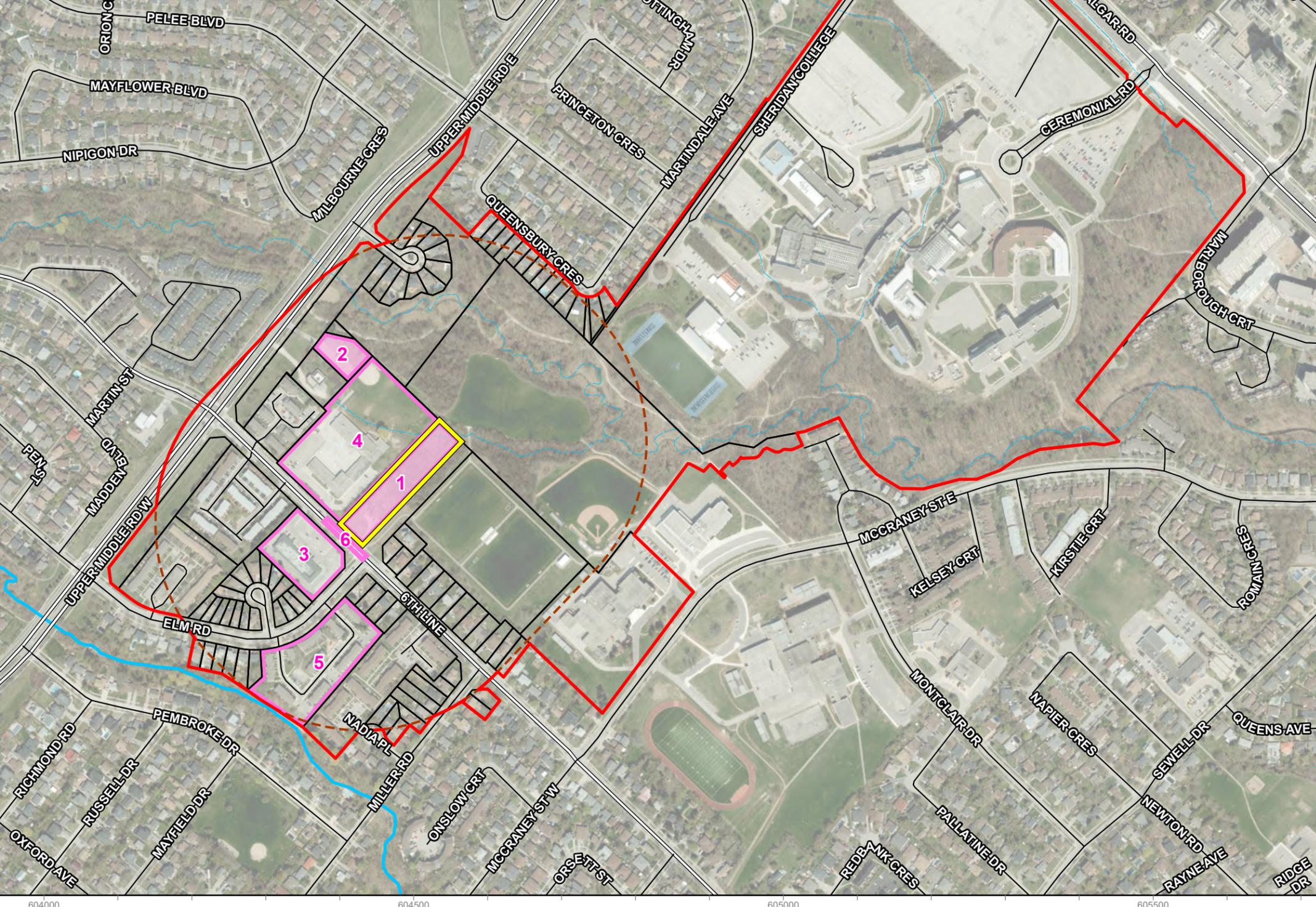


Figure No.
2

900-0494-03.R01 - RSC - F03 R00 V02 - Potentially Contaminating Activities Date and Time Saved: Feb 04, 2026 9:58 AM Drawn By: jvanderveide Reviewed By: BV Version: 2

PCA Address Number	Address	Potentially Contaminating Activity
1	1493 Sixth Line	#28 Gasoline and Associated Products Storage in Fixed Tanks
2	36 Upper Middle Road	#28 Gasoline and Associated Products Storage in Fixed Tanks
3	1500 Sixth Line	#37 Operation of Dry Cleaning Equipment (Where Chemicals Are Used)
4	1511 Sixth Line	#52 Storage, Maintenance, Fuelling and Repair of Equipment, Vehicles and Material Used to Maintain Transportation Systems
5	1478 and 1490 Elm Road	N/A - Spills
6	Sixth Line	#55 Transformer Manufacturing, Processing and Use N/A - Application of Road Salt for De-icing Purposes



Potentially Contaminating Activities

Penalta Group Ltd.
 Phase One Environmental Site Assessment
 Record of Site Condition
 1493 Sixth Line, Oakville, Ontario
 Trace Project No. 900-0494-03

Legend

- RSC Site Boundary
- Highway
- Major Road
- Local Street
- Watercourse Permanent
- Watercourse Intermittent
- RSC 250-m Buffer
- Phase One Study Area
- Potentially Contaminating Activities (PCAs)
- PCAs Causing Areas of Potential Environmental Concern



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
 2. Base Features: Ontario Provincial Mapping, National Railway Network
 3. Base Image: ESRI World Wayback Imagery, 2023
 4. Inset Image: ESRI World Topographic Map

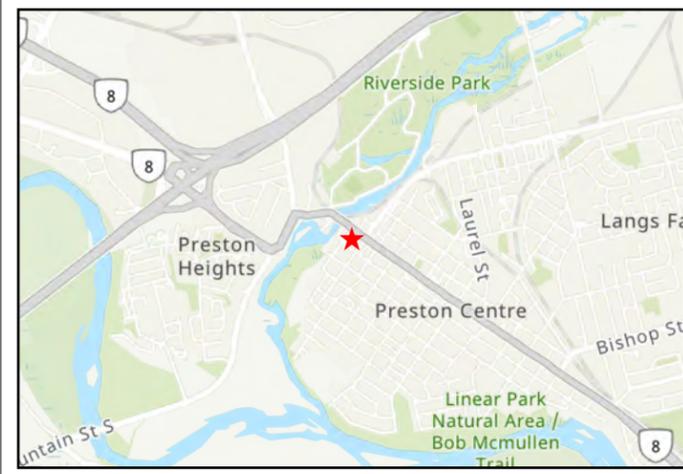


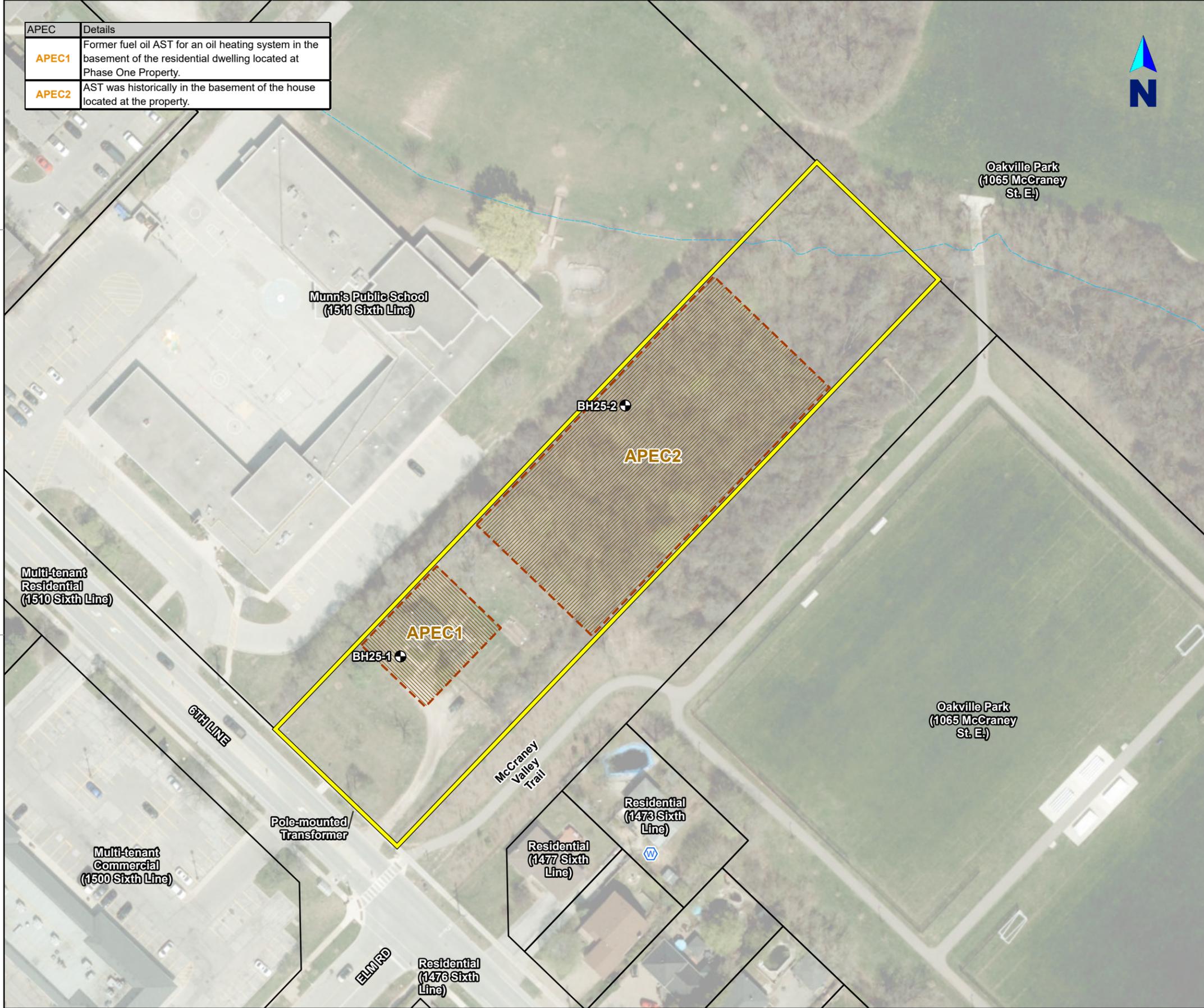
Figure No.
3

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900-0494-03 R01 - RSC - F04 R00 V01 - Areas of Potential Environmental Concern Date and Time Saved: Feb 04, 2026 12:04 PM Drawn By: jvanderwoude Reviewed By: BV Revision: 0 Version: 1

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APEC	Details
APEC1	Former fuel oil AST for an oil heating system in the basement of the residential dwelling located at Phase One Property.
APEC2	AST was historically in the basement of the house located at the property.

Areas of Potential Environmental Concern

Penalta Group Ltd.
Phase One Environmental Site Assessment
Record of Site Condition

1493 Sixth Line, Oakville, Ontario
 Trace Project No. 900-0494-03

- Legend
- RSC Site Boundary
 - Property Boundaries
 - Water Well
 - Watercourse Intermittent
 - Monitoring Well Location (May 2025, Trace)
 - Area of Potential Environmental Concern



- Notes
1. Coordinate System: NAD 1983 UTM Zone 17N
 2. Base Features: Ontario Provincial Mapping, National Railway Network
 3. Base Image: ESRI World Wayback Imagery, 2022
 4. Inset Image: Canada Base Map - Transportation

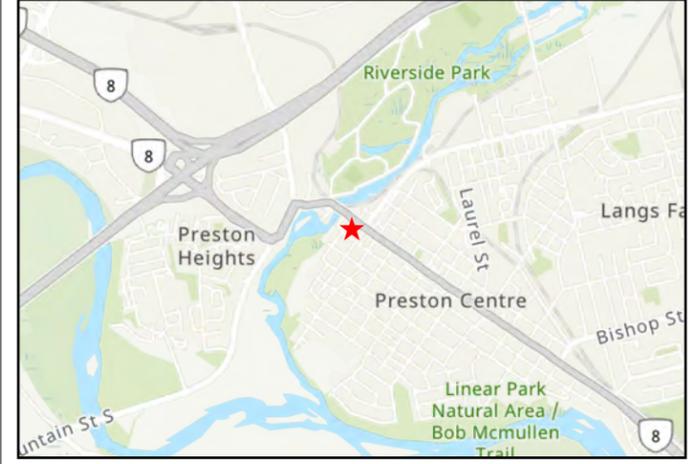
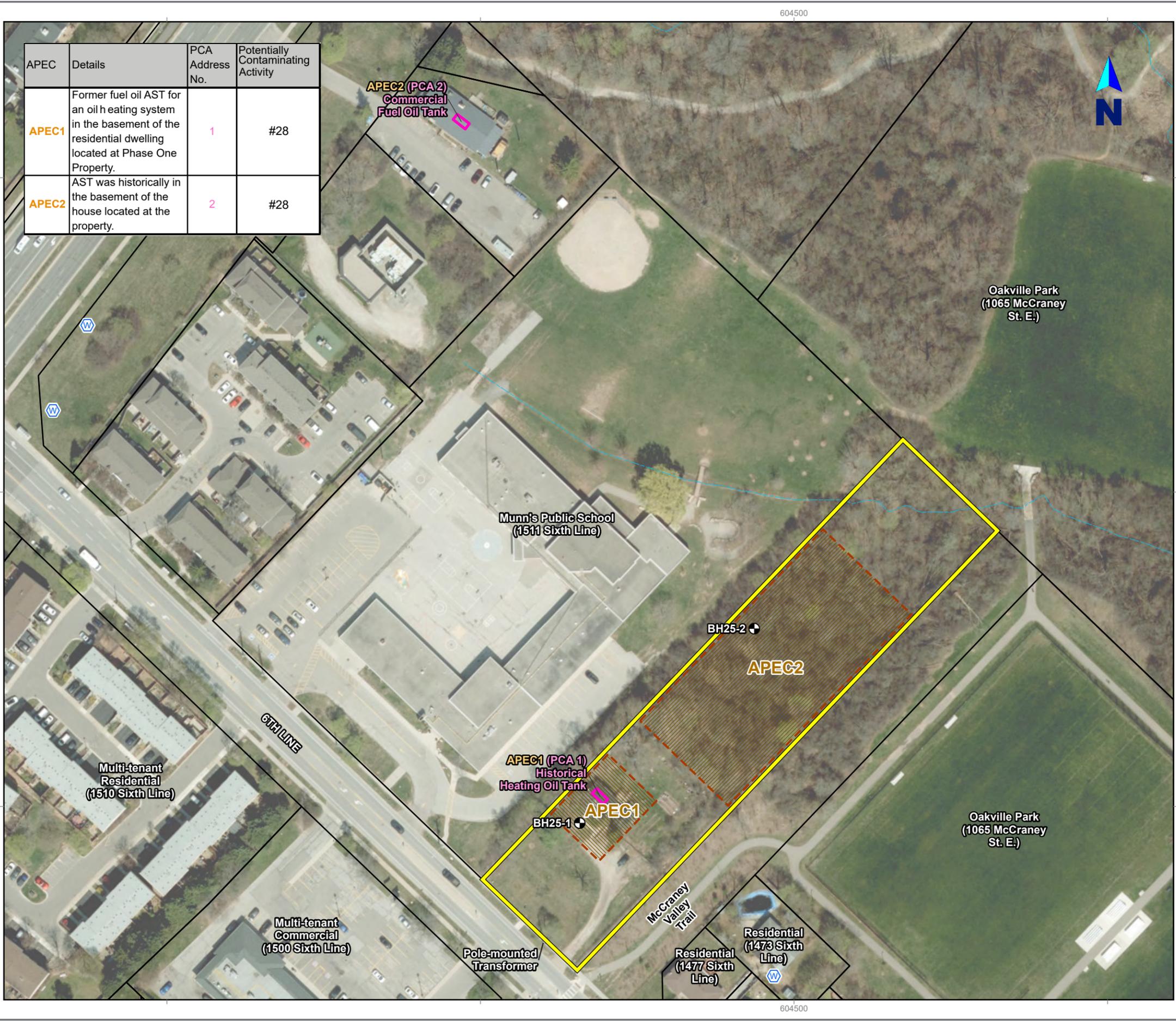


Figure No.
4

This map is for reference purposes only and is not to be used for surveying, engineering or legal purposes. No warranties, either expressed or implied, are made by Trace for the accuracy, completeness, reliability, usability or suitability of the information presented, as generated by Trace or other third party sources. Users should refer to the original source datasets to ascertain the usability of the information displayed.

900-0494-03 R01 - RSC - F05 R00 V01 - APECs and PCAs Date and Time Saved: Feb 04, 2026 11:58 AM Drawn By: jvandervelde Reviewed By: BV Revision: 0 Version: 1



604500

604500

APEC	Details	PCA Address No.	Potentially Contaminating Activity
APEC1	Former fuel oil AST for an oil heating system in the basement of the residential dwelling located at Phase One Property.	1	#28
APEC2	AST was historically in the basement of the house located at the property.	2	#28

Potentially Contaminating Activities and Areas of Potential Environmental Concern

Penalta Group Ltd.
 Phase One Environmental Site Assessment
 Record of Site Condition

1493 Sixth Line, Oakville, Ontario
 Trace Project No. 900-0494-03

Legend

- RSC Site Boundary
- Property Boundaries
- Water Well
- Watercourse Intermittent
- Monitoring Well Location (May 2025, Trace)
- Potentially Contaminating Activities
- Area of Potential Environmental Concern



Notes

1. Coordinate System: NAD 1983 UTM Zone 17N
2. Base Features: Ontario Provincial Mapping, National Railway Network
3. Base Image: ESRI World Wayback Imagery, 2022
4. Inset Image: Canada Base Map - Transportation

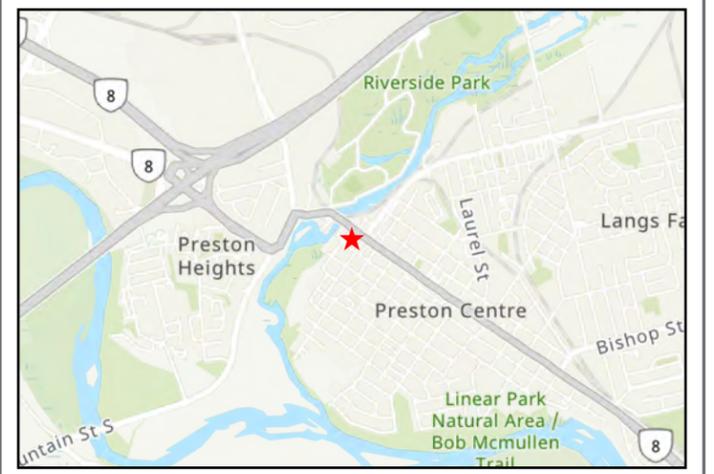


Figure No.
5

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Appendix A

Trace Associates Inc.
Professional Report
Conditions

1.0 USE OF REPORT

This report pertains to a specific site, development, organization, or business and a specific scope of work, all as specifically identified in the within report (the "Report") (such site, development, organization or business and scope of work is hereinafter referred to as the "Subject"). It is not applicable to any other Subject. An assessment or evaluation of a Subject other than the one specifically identified in the within Report would necessitate a supplementary evaluation.

This Report and the assessments, evaluations, and recommendations contained in it are intended for the sole use of Trace Associates Inc.'s (Trace's) client, as specifically identified in the Report (the "Client"). If this Report is being read by any other person (other than from a regulatory body or government agency), such person is hereby advised that Trace is not making any observations, evaluations, or recommendations for such person's benefit and such person is unable to rely on the contents of this Report. Any such person would use this Report at their own risk, and liability is expressly declined to any person other than the Client. Accordingly, no responsibility is accepted by Trace for any damages suffered by any reader of this Report other than the Client. Diligence by all readers is assumed. Any use of or reliance on the Report by any person other than the Client is at the sole risk of the user.

This Report is subject to copyright and may not be reproduced either wholly or in part without the prior, written permission of Trace. The Client agrees that it shall use the Report for its own internal purposes, and it shall not provide the Report to another party (other than a regulatory body or government agency). The report provided is suitable for use by the client for the intended purpose only after accounts are settled for the work conducted.

2.0 LIMITATION OF REPORT

This Report is based solely on the information and conditions that existed and were presented to Trace at the time of Trace's evaluation. The Client acknowledges conditions affecting the contents of this Report can vary with time and that the conclusions and recommendations set out in this Report are time sensitive.

The Client also acknowledges that the conclusions and recommendations set out in this Report are based on limited observations and upon circumstances, assumptions and information presented or made available to Trace by the Client and, where applicable testing on the Subject site. Further, the Client acknowledges that conditions may vary across a site and with time which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making, any recommendations with respect to the purchase, sale, investment or development of the site, the decisions on which are the sole responsibility of the Client.

3.0 INFORMATION PROVIDED TO TRACE BY OTHERS

During the performance of the work and the preparation of this Report, Trace may have relied on information provided by persons (third parties) other than the Client if instructed to do so by the Client. Trace did not verify this information and accepts no responsibility for the accuracy or the reliability of such information and disclaims all liability with respect thereto.



4.0 LIMITATION OF LIABILITY

In consideration of Trace providing the services requested by the Client to complete the Report, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by the Client, the Client agrees that Trace's liability shall be limited as follows:

1. With respect to any claims brought against Trace by the Client for damages of any kind whatsoever, including without limitation, incidental, consequential, exemplary, or punitive damages, for any reason whatsoever arising out of the observations, conclusions, or recommendations contained in the Report, the amount of such claim and the extent of Trace's liability shall be limited to the amount of fees paid by the Client to Trace under this Agreement.
2. With respect to claims brought by any third parties arising out of the contents of this Report, the Client agrees to indemnify, defend, and hold harmless Trace from and against any and all claim or claims, action or actions, demands, damages, penalties, fines, losses, costs, and expenses of every nature and kind whatsoever, including solicitor-client costs, arising or alleged to arise either in whole or part out of services provided by Trace or the Report completed by Trace.

5.0 DISCLOSURE OF INFORMATION BY CLIENT

The Client acknowledges that in conducting the scope of work (the "Scope") and preparing the Report, Trace has relied on information provided by the Client. Trace, in conducting the Scope and preparing the Report, has assumed the accuracy, and has not attempted to verify the completeness of all such information. The Client acknowledges that Trace cannot be held liable for any damages to the Client resulting from any inaccuracies or incompleteness in the information provided by the Client to Trace.

6.0 STANDARD OF CARE

Services performed by Trace for this Report have been conducted in a manner consistent with the level of skill ordinarily exercised by members of the professional associations of which Trace's employees who worked on this Scope and this Report are members. Professional judgment has been applied in developing the conclusions and/or recommendations provided in this Report (or under separate cover). No further warranty or guarantee, express or implied, is made concerning the test results, comments, recommendations, or any other portion of this Report.

7.0 NOTIFICATION OF AUTHORITIES

The Client acknowledges that in certain instances, the discovery of hazardous substances or conditions and materials may require that regulatory agencies and other persons be informed. The Client acknowledges and agrees that the notification of such bodies or persons remains wholly the responsibility of the Client; however, agrees that notification to such bodies or persons, as required, may be done by Trace in Trace's reasonably exercised discretion.

8.0 OWNERSHIP OF INSTRUMENTS OF SERVICE

The Client acknowledges that all reports, plans, and data generated by Trace during the performance of the work and preparation of the Report and other documents prepared by Trace in the course of performing the scope are considered its professional work product and shall remain the copyright property of Trace. Any patents, methods, ideas, concepts, know-how, copyrights, trademarks, trade secrets, or other intellectual property rights developed by Trace prior to, during, and in the course of performing the Services



("IP") will be the exclusive property of Trace. The only exception to this is where Trace has prepared an Emergency Response Plan and associated training materials for a Client; in these cases, the Client owns these documents and is solely responsible for their implementation in an emergency.

9.0 ALTERNATE REPORT FORMAT

Where Trace submits both electronic file and hard copy versions of the Report, drawings, and other documents and deliverables (collectively termed "Trace's instruments of professional service"), the Client agrees that only the signed and stamped versions shall be considered final and legally binding. Trace shall keep the original electronic documents for record and working purposes, and, in the event of a dispute or discrepancies, Trace's electronic copy shall govern.

The Client agrees that both electronic file and hard copy versions of Trace's instruments of professional service shall not, under any circumstances, no matter who owns or uses them, be altered by any party, except Trace. The Client warrants that Trace's instruments of professional service will be used only and exactly as submitted by Trace and for the purpose for which such instruments of professional service were intended.

The Client recognizes and agrees that electronic files submitted by Trace have been prepared and submitted using specific software and hardware systems. Trace makes no representation about the compatibility of these files with the Client's current or future software and hardware systems.

10.0 RECORDS RETENTION

Trace will, at its own cost and effort, retain project related Client data, including billing records, project files, documents, and final reports, for 12 years from the date of written authorization to proceed with the Scope. After 12 years, all data and information will be destroyed without notice to the Client. The Client may request in writing, within the 12-year period, copies of such information, and Trace will provide the information to the Client at the Client's cost.

11.0 GOVERNING LAW

The validity, construction, and performance of these General Conditions, which the Client shall be deemed to have accepted upon its acceptance of this Report, shall be governed by the laws in effect in the Province where the Subject site is located.



Appendix B

Site Photographs



Photo 1: View of the front of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 2: View of the garage of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 3: View of the east side of the residential dwelling at the Phase One Property, with empty drums (January 28, 2026).



Photo 4: View of the Phase One Property, facing south (January 28, 2026).



Photo 5: View of two sheds at the Phase One Property (January 28, 2026).



Photo 6: View of the west side of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 7: View of flooding in the basement of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 8: View of kitchen sink flooding at the residential dwelling at the Phase One Property (January 28, 2026).



Photo 9: View of the stove in the kitchen of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 10: View of flooding in a room on the main floor of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 11: View of the bathroom on the main floor of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 12: View of the living room area on the main floor of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 13: View of damaged windows on the main floor of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 14: View of the attic of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 15: View of an upstairs room of the residential dwelling at the Phase One Property (January 28, 2026).



Photo 16: View of the adjacent property to the west-southwest, 1500 Sixth Line (January 28, 2026).



Photo 17: View of the adjacent property to the northwest, 1511 Sixth Line (January 28, 2026).



Photo 18: View of the transformer on Sixth Line (January 28, 2026).



Photo 19: View of the adjacent residential dwellings and trail to Oakville Park, to the east (January 28, 2026).



Photo 20: View of 36 Upper Middle Road, north of the Phase One Property (January 28, 2026).



Appendix C

Regulatory Agency
Search Records

Sydney Cook

From: Public Information Services <publicinformationsservices@tssa.org>
Sent: February 4, 2026 1:51 PM
To: Barb Voutos
Subject: RE: Fuel Storage Tank Request

Hello ,

RECORD FOUND IN CURRENT DATABASE:

- We confirm that there are **fuels records** in our database at the subject address(es).

Inventory Number	Address	City	Province	Postal Code	Reason Code	Asset Class / Inventory
61476465	36 UPPER MIDDLE RD E	OAKVILLE	ON	L6H 7M1	Active	FS Fuel Oil Tank

***NO OTHER RECORDS FOUND IN CURRENT DATABASE FOR THIS REQUEST**

For a further search in our archives, please go to the [TSSA Client Portal](#) to complete an Application for Release of Public Information. Please refer to [Training \(tssa.org\)](#) for instructions on how to use the portal. Please refer to [How to Submit a Public Information Request \(tssa.org\)](#) for instructions.

The associated fee must be paid via credit card (Visa or MasterCard).

Once all steps have been successfully completed you will receive your payment receipt via email.

TSSA does not make any representations or warranties with respect to the accuracy or completeness of any records released. The requestor assumes all risk in using or relying on the information provided.

If you have any questions or concerns, please do not hesitate to contact our Public Information Release team at publicinformationsservices@tssa.org.

Kind regards,



Slavka Zahrebelny | Public Information & Records Agent

Public Information
345 Carlingview Drive
Toronto, Ontario M9W 6N9
Tel: +1 416-734-3585 | Fax: +1 416-734-6242 | E-Mail: szahrebelny@tssa.org
www.tssa.org



Winner of 2025 5-Star Safety Cultures Award

From: Barb Voutos <bvoutos@traceassociates.ca>
Sent: February 4, 2026 1:00 PM

To: Public Information Services <publicinformationservices@tssa.org>

Subject: Fuel Storage Tank Request

 External Email >

**[⚠ CAUTION]: THIS EMAIL ORIGINATED OUTSIDE THE ORGANISATION.
DO NOT CLICK LINKS OR OPEN ATTACHMENTS UNLESS YOU KNOW THE SENDER AND ARE EXPECTING THIS EMAIL. PLEASE
REPORT WITH THE PHISH REPORT BUTTON IF SUSPICIONS.**

Hello,

Can you please search your database for records of fuel storage tanks at the following addresses in Oakville, Ontario:

- 1493 Sixth Line
- 1500, 1511, 1471, 1531, 1536, Sixth Line
- 36 Upper Middle Road
- 1478, 1490 Elm Road

Thank you,
Barb

BARBARA VOUTOS, B.Eng., P.Eng.

Project Consultant, Trace Associates Inc.
820 Trillium Drive, Kitchener, Ontario, N2R 1K4
519.741.5774 | bvoutos@traceassociates.ca
www.traceassociates.ca

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