



Drain-All Ltd. – www.drainall.com - 1-800-265-3868

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4380 Trail Road Design and Operations Report and Supporting Application Documents

October 01st, 2020
Revised June 04, 2021

OVERVIEW OF SOILS MANAGEMENT PROTOCOL

Contents

1 Trail Road Pit Acceptance Procedure 2

1.1 SCOPE **Error! Bookmark not defined.**

1.2 PROCEDURE **Error! Bookmark not defined.**

1.3 ROLES AND RESPONSIBILITIES **Error! Bookmark not defined.**

1.4 TRAINING AND COMMUNICATION **Error! Bookmark not defined.**

1.5 EVALUATION **Error! Bookmark not defined.**

2 TRAIL ROAD SITE OPERATIONAL STRUCTURE AND RESPONSIBILITIES 4

2.1 QUALIFIED PERSON 4

2.2 MANAGER OF WASTE TRANSFER FACILITIES 4

2.3 SITE SUPERVISOR 4

2.4 INDUSTRIAL OPERATIONS MANAGER 5

3 Excavation Screening and Job Initiation 5

3.1 Each work order if excess soils excavation will be screened with the client in the following manner: .. 5

3.2 Job Initiation 5

3.3 On Site Work Component 5

4 TRACKING SYSTEM FOR EXCESS SOILS 6

4.1 SHIPPING DOCUMENT FOR EXCESS SOILS 7

4.2 PDF FROM MOBILE WORK PLATFORM 8

4.3 REPORT FUNCTIONALITY FROM WASTE TRACKING DATABASE 10

4.4 Appendix A **Error! Bookmark not defined.**

5 Sampling Program for Excavated Soils 11

5.1 Rejected Loads not meeting Table 6 of Regulation 153 11

6 Handling of Contaminated vs. non-Contaminated Soils 12

6.1 Placement of Excess Soils at the Trail Road Site 12

7 Notification to Adjacent Property Owners 13

8 Site Plan 14

9 Zoning Map of 4380 Trail Road 15

10 Scaled Area Map of 4380 Trail Road 16

11 UTM Easting and Northing Coordinates of 4380 Trail Road 17



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1 TRAIL ROAD PIT ACCEPTANCE PROCEDURE

Drain All Ltd. is involved in the removal of excess soils, both dry or liquid soils that are not from areas of environmental concern or known historical contamination. The removal of these soils is undertaken on behalf of clients who are performing scheduled or emergency maintenance of utilities, such as electrical, natural gas, water, or telecommunications. The work is primarily conducted in residential settings; however, it may include commercial and industrial settings. In some instances, the excess soil removed may have had the associated testing completed to reflect it is suitable to be deposited at the Trail Road site.

Any soils that are identified as contaminated or potentially contaminated, either by our trained operators or our client representative, are not to be delivered to the Trail Road site. Contaminated soils are removed and delivered to our licensed transfer and processing facilities in Ottawa and Napanee.

1.1 SCOPE

This procedure will outline the activities to collect, transport and deliver excavated soils to our property at Trail Road which are used for the placement and storage of the excavated soils.

1.2 PROCEDURE

Industrial Operators

If there are any odors or visual signs of contamination in the soil before and during excavation, stop work and contact your Supervisor or Manager directly. Your Supervisor or Manager will begin the process, in cooperation with the Sales Department, of notifying the client and making alternate arrangements of handling the soil with suspect contamination. It will be redirected as contaminated soil to one of our licensed transfer and processing facilities for required laboratory testing, characterization, and disposal.

If the site observation, olfactory inspection, and Job Hazard Analysis show no indication of contaminants or visible spills in the excavation area you can proceed.

When a vacuum truck, hydro excavator or combination unit is assigned to excavate and transport soil to the Trail Road site, the operator will be assigned a Shipping Document. In combination with our electronic mobile work platform that and the shipping document, the operators will have access to the following information:

- The location at which the excess soil was loaded for transportation.
- The quantity of excess soil in the load.
- The name of an individual who may be contacted to respond to inquiries, including inquiries regarding the soil quality.
- The date and time the excess soil was loaded for transportation and left the project area.
- The name of the corporation, partnership, or firm transporting the excess soil.



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4380 Trail Road Design and Operations Report and Supporting Application Documents

October 01st, 2020

Revised June 04, 2021

- The name of the driver of the vehicle.
- The license plate number issued for the vehicle.
- The date, time, and site location at which the excess soil was deposited.
- The name of the person who received the excess soil at the site.

The Shipping Document is intended to be used for each excavation site that composes a portion of a truck load of soil that is subsequently delivered to the Trail Road site, after the group of assigned job sites have been completed by the operator.

Upon delivery to the Trail Road site and during the placement of the soils, the operator is to collect 2 x 500ml sample collection jar. The collection jar is required to be filled completely to the top.

All samples are to be labelled using the assigned pre-printed labels and delivered to dispatch with all corresponding paperwork for the assigned jobs during the workday.

Upon depositing of the load at site, a numbered flag is placed in the soil. This number is taken from the Shipping Document assigned to the load. This becomes the lot number of this unique load.

Dispatch Personnel

The individual fulfilling the dispatch function at the time the operator returns from the Trail Road site will ensure that the required number of samples have been submitted for each job site the operator has completed during the day. The dispatch operator will also review the Shipping Document and ensure it has been filled out accurately and completely. The samples for the excavation projects completed that day will then be forwarded the following morning to the Drain-All Laboratory for the required analytical testing.

1.3 ROLES AND RESPONSIBILITIES

The Industrial Operator is to ensure that the Shipping Document is complete and accurate so that it can be utilized by the dispatch department, laboratory, and the accounting department.

Dispatch personnel must ensure that they review the Shipping Document in comparison with all scheduled jobs that the operator and the excavation unit were assigned to complete during the daily activities.

1.4 TRAINING AND COMMUNICATION

This procedure will be provided to operators and dispatch personnel in a formal training session to review its contents and responsibilities.

Training will be documented with a training roster sheet with participant names, course content, and the date of training.



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4380 Trail Road Design and Operations Report and Supporting Application Documents

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Revised June 04, 2021

The training records will be forwarded to the Human Resources Coordinator and filed for records retention and documented electronically on the employee's record of training.

This procedure will also be made available through the internal database for the employees to review when needed.

1.5 EVALUATION

This procedure will be evaluated at least annually or as often as required.

2 TRAIL ROAD SITE OPERATIONAL STRUCTURE AND RESPONSIBILITIES

2.1 QUALIFIED PERSON

The activity and sampling protocol of the soils placed and stored on the property will be overseen by a Qualified Person who is licensed under the Professional Engineers Act or holds a certificate of registration under the Professional Geoscientists Act and is a practicing member of the Association of Professional Geoscientist of Ontario.

The Qualified Person will assist in the preparation of documents under the applicable regulation, including the assessment of past uses, sampling and analysis plan, soil characterization report and excess soil destination assessment report.

2.2 MANAGER OF WASTE TRANSFER FACILITIES

The Manager of the waste transfer facilities will be responsible to manage the implementation of the of the Design and Operations Report, the Conditions of the Environmental Compliance Approval(s) issued to 4380 Trail Road excess soils placement site and the operational procedures written into the Design and Operations report. The Manager will work with the Qualified Person to ensure that all the above is written, implemented, and revised when necessary to ensure compliance at the site. The Manager will ensure regulatory reporting as required by the ECA is completed and forwarded to the MECP by the required deadlines as noted by the Regulations or the ECA. Training for site personnel will be provided to relevant Managers and Supervisors within the Company to ensure that is delivered to workers who may be required to perform work at 4380 Trail Road.

2.3 SITE SUPERVISOR

The assigned on-site Supervisor will ensure that the site requirements as listed in the Trail Road Site Acceptance Procedures are adhered to which include but are not limited to the following responsibilities:

The Shipping Document is completed by the Industrial Operator and is signed off as accepted by the Site Supervisor when excess soils are delivered to the site.

Upon Delivery to Trail Road and during the placement of the soils, the operator is to collect 2 x 500ml sample collection jar which is required to be filled completely to the top.



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4380 Trail Road Design and Operations Report and Supporting Application Documents

October 01st, 2020

Revised June 04, 2021

All samples are to be labelled using the assigned pre-printed labels.

Prior to leaving the site a numbered identifying flag is used to mark the unique load that was deposited. The numbered identifying flag becomes the Lot Number of the soil being placed while analytical testing is completed.

2.4 INDUSTRIAL OPERATIONS MANAGER

The Industrial Operations Manager is responsible to ensure that vehicles assigned to excavate excess soils and deliver to 4380 Trail Road are clean and do not contain any residual product that could contaminate a load of excess soil. This is accomplished through a pre-trip training inspection program that will be delivered to Industrial Operators.

The Manager must train Dispatch personnel to schedule vehicles and ensure that cross contamination of a load of excess soil by previous activity does not occur. Dispatch personnel must also be trained to schedule a unit for decontamination at a Drain-All waste transfer and processing facility after handling a known contaminated excess soil load or a potentially contaminated excess soil load.

3 EXCAVATION SCREENING AND JOB INITIATION

3.1 EACH WORK ORDER IF EXCESS SOILS EXCAVATION WILL BE SCREENED WITH THE CLIENT IN THE FOLLOWING MANNER:

- What is the current land use of the excavation area, commercial, industrial, or residential?
- If the land use is not residential, please identify site utilization of the commercial or industrial use.
- If the land use is residential, please specify if it has been residential for longer than 5 years.
- If the land use has been residential for less than 5 years, is the past land use known?
- Is there any record of a spill or contamination on the property either present or in past that may impact the quality of soil?

3.2 JOB INITIATION

Once the pre-screening of the work area identifies that the soil is likely to meet the criteria of excess soil and not yield contaminated material, the job will be initiated as an excess soil excavation. Work requests will be sent to the dispatch department and onsite time and date will be confirmed with the client. Work orders will be created, and resources will be allocated to the job. Trained Operators will perform a pre-trip inspection to ensure that the excavation unit is in good working order, with a clean debris tank and associated equipment to perform the excavation.

3.3 ON SITE WORK COMPONENT

Assigned work crews will travel to site and will perform a site inspection, which will consist of a Job Hazard Analysis. The JHA performed by the equipment operator will consist of verifying valid locates are in place, and inspection of the excavation site. The inspection of the excavation site will include visual inspection to ensure



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that there are no indications of any spills or contamination that may impact soil quality. Olfactory inspection of the work area also to ensure that there is no evidence of spills or contamination that may impact soil quality.

- If there are concerns arising from updated client information about the excavation site, visual inspections, or olfactory inspections the soil will be removed from site using a manifest and transported to one of Drain-All's licensed Waste Transfer and Processing sites for testing and appropriate handling.
- If no concerns arise from the JHA, site inspection and provided client information the excavation and removal of excess soils will proceed. The excess soils will be transported and stored at the Trail Road site for placement and rehabilitation of the property in keeping with this program and suitable analytical results on file.

4 TRACKING SYSTEM FOR EXCESS SOILS

The tracking components utilized for the placement of excess soils at the Trail Road site will be stored in our Kloudgin mobile workforce platform, our Filemaker waste database tracking system and our Shipping Documents. Below are the components of the tracking system that will form the information required to be retained. The components are identified on the following sample documents, which include the Shipping Document, a PDF creation from our mobile Kloudgin work platform and a report from our Filemaker waste database.

1. The locations of the project area where the soil was excavated and stockpiled, if applicable, and the quality of the soil associated with those locations and stockpiles.
2. The quantity of the load of excess soil being removed from the project area.
3. The location of the site at which the excess soil is to be deposited.
4. The date and time the excess soil left the project area.
5. The person from the project area responsible for overseeing the loading of the excess soil for transportation.
6. The name of the corporation, partnership or firm transporting the excess soil, the name of the driver of the vehicle and the license plate issued for the vehicle under the Highway Traffic Act.
7. The date and time the excess soil was received at the site where the excess soil has been deposited.
8. The contact information of the person who acknowledged receipt of the load of excess soil on behalf of the site where the excess soil was deposited. Confirmation that the vehicle that deposited the excess soil and the volume of soil received at the site where the excess soil was deposited is the same as that which left the project area.



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4.1 SHIPPING DOCUMENT FOR EXCESS SOILS

UN Number		Shipping Name (if applicable, Technical Name)		Class (Primary and Subsidiary)		PG	Quantity Shipped (kg or L)	Type of Containers	Composition	
Work Order # =		Client Name =							<input type="checkbox"/> Clay <input type="checkbox"/> Gravel <input type="checkbox"/> Sand <input type="checkbox"/> Top Soil <input type="checkbox"/> Mixture	
NA	EXCAVATED SOIL – INERT FILL	NA	NA	2	kg		Bulk			
Work Order # =		Client Name =							<input type="checkbox"/> Clay <input type="checkbox"/> Gravel <input type="checkbox"/> Sand <input type="checkbox"/> Top Soil <input type="checkbox"/> Mixture	
NA	EXCAVATED SOIL – INERT FILL	NA	NA		kg		Bulk			
Work Order # =		Client Name =							<input type="checkbox"/> Clay <input type="checkbox"/> Gravel <input type="checkbox"/> Sand <input type="checkbox"/> Top Soil <input type="checkbox"/> Mixture	
NA	EXCAVATED SOIL – INERT FILL	NA	NA		kg		Bulk			
Work Order # =		Client Name =							<input type="checkbox"/> Clay <input type="checkbox"/> Gravel <input type="checkbox"/> Sand <input type="checkbox"/> Top Soil <input type="checkbox"/> Mixture	
NA	EXCAVATED SOIL – INERT FILL	NA	NA		kg		Bulk			
Please ensure sample jars are full and wiped clean. Enbridge requires 2 full 500mL samples.									Final Sample Taken? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Drain-All Ltd. www.drainall.com M.O.E. A860302 Carrier Phone: 913-739-1070 or Toll Free: 1-800-265-3868 24 Hour Emergency Service Available		Ottawa Head Office Sales / Fleet Operations 3385 Hawthorne Road Ottawa, Ontario, K1G 4G2 Fax 613-741-3153		Ottawa Transfer and Processing Facility M.O.E. A460722 2705 Stevenage Drive Ottawa, Ontario, K1G 3N2 Fax 613-739-5971		Napanee Transfer and Processing Facility M.O.E. 3437-87AKXD 444 Advance Ave Napanee, Ontario, K7R 3Z6 Fax: 613-354-9076			Quarry In Time =	Quarry Out Time = 7



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4.2 PDF FROM MOBILE WORK PLATFORM

	Drain-All Ltd. OTTAWA - HEAD OFFICE. 3385 Hawthorne Road, Ottawa, Ontario, K1G 4G2 Tel: 613-739-1070 Fax: 613-741-3153	WorkOrder # : WO09601 Contract # : Project # : Billing Org : Drain-All Ltd
WorkOrder/Project Information		
Customer : Enbridge Gas Inc. (HV) Site/Location Name : ENBRIDGE GAS INC_1126_ST_GERM/ Location : 1126 St-Germain Cres. Ottawa Ontario K1C 2L8 Canada	Site Contact : CUSTOMER Site Phone : 6137486784 Site Email : isa.spencer@enbridge.com Site Cell : Follow Up Contact : Phone : E-Mail : Cell :	
Workorder Notes		
Assigned Crew : Geoff Hitchinson Service Activity : HYDRO EXCAVATION Service Activity Description : Hydro Vac Unit with Operator and Assistant(s) to perform various hydro excavating tasks as directed by client onsite		
Thank You! If you have any questions regarding this information please contact Drain-All Ltd.		



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DrainAll Ltd.	WorkOrder # : WO09601								
Item/Equipment Usage									
Type	Name	Description	Quantity	UOM					
MATERIAL_UPDATE	WATER UP	Water Up	1.0	HR					
MATERIAL_UPDATE	HYDRO VAC SLURRY - LOAD_EA	Hydro Vac Slurry - Load	1.0	EA					
MATERIAL_UPDATE	TRAVEL TO DUMP (REG)	Charge for One Hour Standard Travel to Dump.	1.0	EA					
Vehicle Usage Section									
Vehicle ID	Vehicle Type								
VH00091--HYDRO VAC UNIT--229	Hydro Vac Unit								
Technician TimeLogs									
Date	Technician Name	Resource Type	Activity Time	Actual Travel Time	Billable Travel	Total Actual Time	Total Billable Time	Clock-In to W/O	Clock-Out to W/O
15-Oct-2020	Geoff Hinchinson	Operator	4.072	0.39	1	4.462	5.072	8:59	13:26
15-Oct-2020	Michael Valiquette	Helper	4.044	0.39	1	4.433	5.044	8:59	13:24 ⁴
Workorder Notes									
Scope Of Work :									
Require Hydro vac unit with Operator & Assistant to perform various hydro excavating tasks as directed by client onsite. Please be extra detailed on your bill as to the dimensions of the holes and/or trenches created on site during project.									
Thank You! If you have any questions regarding this information please contact Drain-All Ltd.						Page 2 of 4			



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Revised June 04, 2021

4.3 REPORT FUNCTIONALITY FROM WASTE TRACKING DATABASE

The tracking system will be capable of tracking the total number of vehicles and total volume of excess soil that has left a project area for a site at which it is to be deposited. The system can also produce reports upon request with respect to the information of each load of excess soil to be tracked.

1			
2	Summary of Loads and Volume Received at Drain-All Ltd. at 4380 Trail Road Site		
3	Project Address	Sum of Amount (Kg)	Number of loads
4	ENBRIDGE GAS DISTRIBUTION INC. 34 TIERNEY ST SARNPRIOR ON	10000	1
5	ENBRIDGE GAS DISTRIBUTION INC. Gilmour St (East of O'Connor) Ottawa ON	8000	1
6	ENBRIDGE GAS DISTRIBUTION INC. 1811 FLORIDA AVE OTTAWA ON	6000	1
7	ENBRIDGE GAS DISTRIBUTION INC. 2269 Riverside Dr Ottawa ON	2000	1
8	ENBRIDGE GAS DISTRIBUTION INC. 2284 BRAESIDE AVE OTTAWA ON	1500	1
9	ENBRIDGE GAS DISTRIBUTION INC. 613 Gilmour St Ottawa	2000	1
10	ENBRIDGE GAS DISTRIBUTION INC. CARLING AVE @ SAIGON OTTAWA ON	57000	6
11	ENBRIDGE GAS DISTRIBUTION INC. ELGIN ST & LISGAR OTTAWA ON	110300	14
13	ENBRIDGE GAS DISTRIBUTION 1 1/2 John St Brockville ON	3000	1
14	ENBRIDGE GAS DISTRIBUTION 111 WELLINGTON ST OTTAWA ON	5500	1
15	ENBRIDGE GAS DISTRIBUTION 112 Water St wBrockville ON	4000	1
16	ENBRIDGE GAS DISTRIBUTION 114 Water St wBrockville ON	4000	1
17	ENBRIDGE GAS DISTRIBUTION 116 WATER ST BROCKVILLE ON	4000	1
18	ENBRIDGE GAS DISTRIBUTION 1172 Cummings Ave Ottawa ON	1500	1
19	ENBRIDGE GAS DISTRIBUTION 118 WATER ST BROCKVILLE ON	5000	1
20	ENBRIDGE GAS DISTRIBUTION 123 MARSHALL ST ALMONTE ON	4000	1
21	ENBRIDGE GAS DISTRIBUTION 123 Water St wBrockville ON	4000	1
22	ENBRIDGE GAS DISTRIBUTION 1385 Coulter Place Orleans ON	2000	1
23	Enbridge Gas Distribution 141-A Percy Street Ottawa ON K1R 5K8	1000	1
24	ENBRIDGE GAS DISTRIBUTION 152 Rideau St Ottawa ON	6800	1
25	ENBRIDGE GAS DISTRIBUTION 1910 ST LAURENT BLVD OTTAWA ON	7500	1



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5 SAMPLING PROGRAM FOR EXCAVATED SOILS

- Each load delivered to the pit forms part of a composite sample and tested internally **weekly** for:
 - Flashpoint
 - pH
 - PCB
 - Oxidizer
 - Metals in accordance with Reg. 406 (EPA); and
- A **monthly** composite is sent out to an external lab for the following parameters:
 - Chromium, hexavalent
 - Cyanide, free
 - Mercury by CVAA
 - PCBs, total
 - pH,
 - PHC F1
 - PHCs F2 to F4
 - REG 153: ABNs + PAHs
 - REG 153: Metals by ICP/MS
 - REG 153: VOCs by P&T GC/MS
 - Solids, % Gravimetric
- The results are compared to Table 6; Generic Site Condition Standards for Shallow Soils in a Potable Ground Water Condition of Reg. 406 (EPA).
- In addition to the above testing we have an agreement with one of our larger clients whereby 10% of loads originating from their projects are sampled and sent to an external, accredited lab (BV Labs) for:
 - Hot Water Extractable Boron
 - Hexavalent Chromium in Soil by IC
 - Petroleum Hydro. CCME F1 & BTEX in Soil
 - Petroleum Hydrocarbons F2-F4 in Soil
 - Strong Acid Leachable Metals by ICPMS
 - Moisture
 - pH CaCl₂

5.1 REJECTED LOADS NOT MEETING TABLE 6 OF REGULATION 153

In 2019, Drain-All removed one load of soil that exceeded the parameter of Lead in Table 6 of Regulation 153 from our Trail Road site and disposed of it to a licensed waste disposal site.

Should any composite analytical test result show that a batch of soil is not suitable for placement and storage at



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the Trail Road site, the composite can be reanalyzed with each discreet sample which formed a portion of the original composite sample. This will identify the specific load(s) of soil forming a portion of the original composite batch that exceeded one or more parameters.

The sampling program of the materials placed at the site ensures that there is an appropriate amount of sample to do both the initial composite analysis and any subsequent analytical requirements.

6 HANDLING OF CONTAMINATED VS. NON-CONTAMINATED SOILS

In the interests of environmental stewardship, we would like to see every excavated load directed towards our Trail Road facility. Every load destined for Trail Road has been screened appropriately to confirm the absences of any contamination. Conversely waste class soils must be directed to licensed facilities as per the accompanying manifests which also enable us to invoice our clients accordingly. Waste class soils yield a 4-fold increase in profit, which certainly confirms the absence of any incentive to intentionally direct any soils to Trail Road.

6.1 PLACEMENT OF EXCESS SOILS AT THE TRAIL ROAD SITE

Soils that are transported for placement and storage are deposited in the following manner:

Liquid soils have the liquid portion placed in **Area A** of the **Site Plan** diagram of this document. The liquid portion of the load will be released from the vacuum truck using the rear valves allowing the operator to observe the material.

The solid portion of the loads are placed in **Area B** of the **Site Plan**. In this area the load is assigned a unique lot number that will correspond to the completed lab analytical confirming that the load is suitable to be moved for storage.

Dry soils would be placed in **Area B** of the **Site Plan** diagram. In this area the load is assigned a unique lot number that will correspond to the completed lab analytical confirming that the load is suitable to be moved for storage.

Upon review of the completed analytical the soil is utilized to rebuild roadways and fill in low lying areas within the property.



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4380 Trail Road Design and Operations Report and Supporting Application Documents

October 01st, 2020
Revised June 04, 2021

7 NOTIFICATION TO ADJACENT PROPERTY OWNERS

The below email correspondence was forwarded both to the City of Ottawa and Lafarge.

As you may not be aware Drain All Ltd is the owner and operator of the parcel of land located at 4380 Trail Road, Ottawa and is required to provide you with a notification of its intention to apply for an environmental compliance approval with the Ministry of the Environment, Conservation and Parks.

Please be advised that Drain All Ltd has applied for an environmental compliance approval with the Ministry of the Environment, Conservation and Parks as a result of the upcoming enactment of Ontario Regulation 406/19 on January 1, 2021 for the management of excess soils in Ontario.

The environmental compliance approval will enable us to continue with the current activities of clean soil deposition and storage to rehabilitate the parcel of land from its prior use as an aggregate operation.

Should you have any questions please do not hesitate to contact me.



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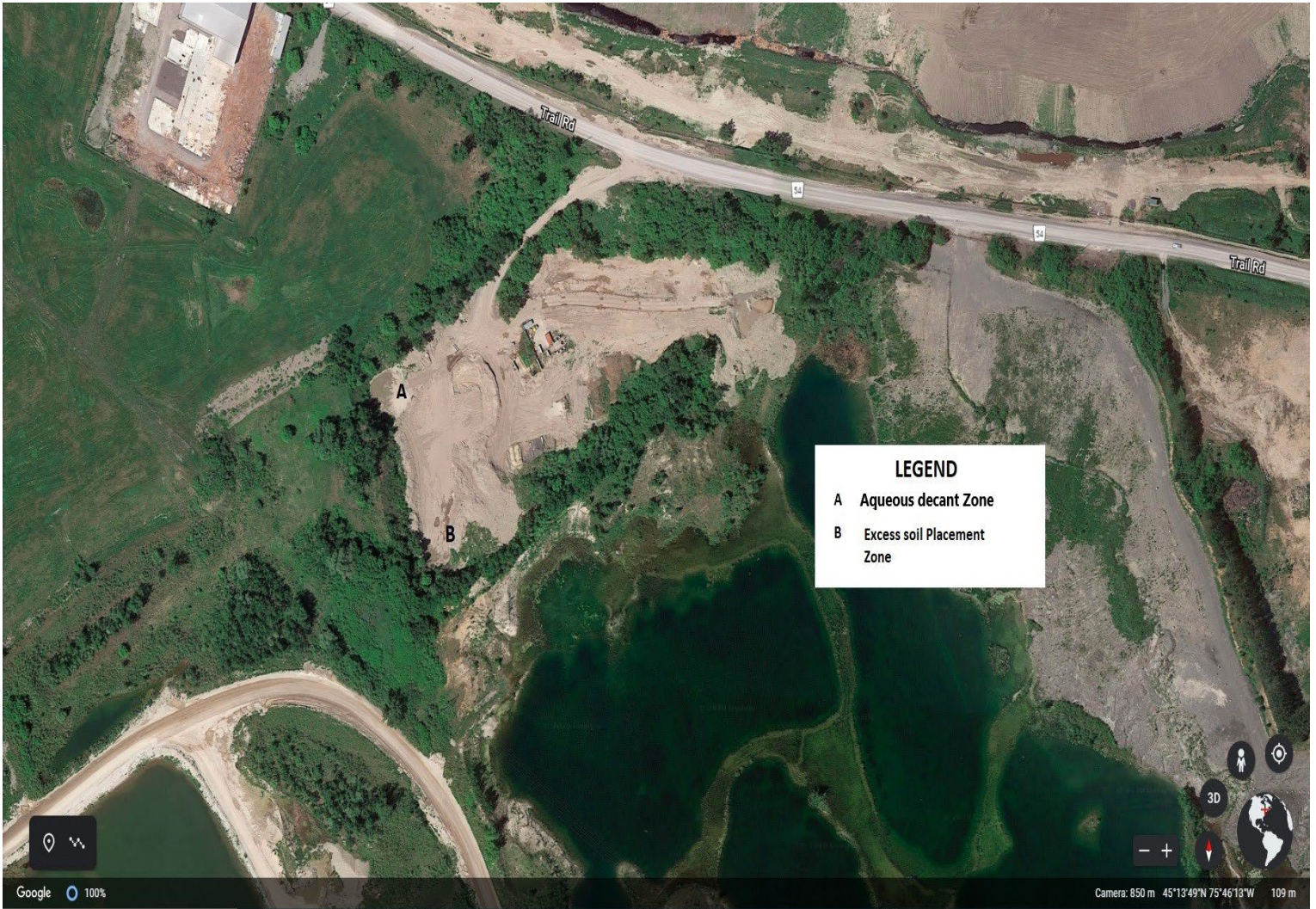
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8 SITE PLAN





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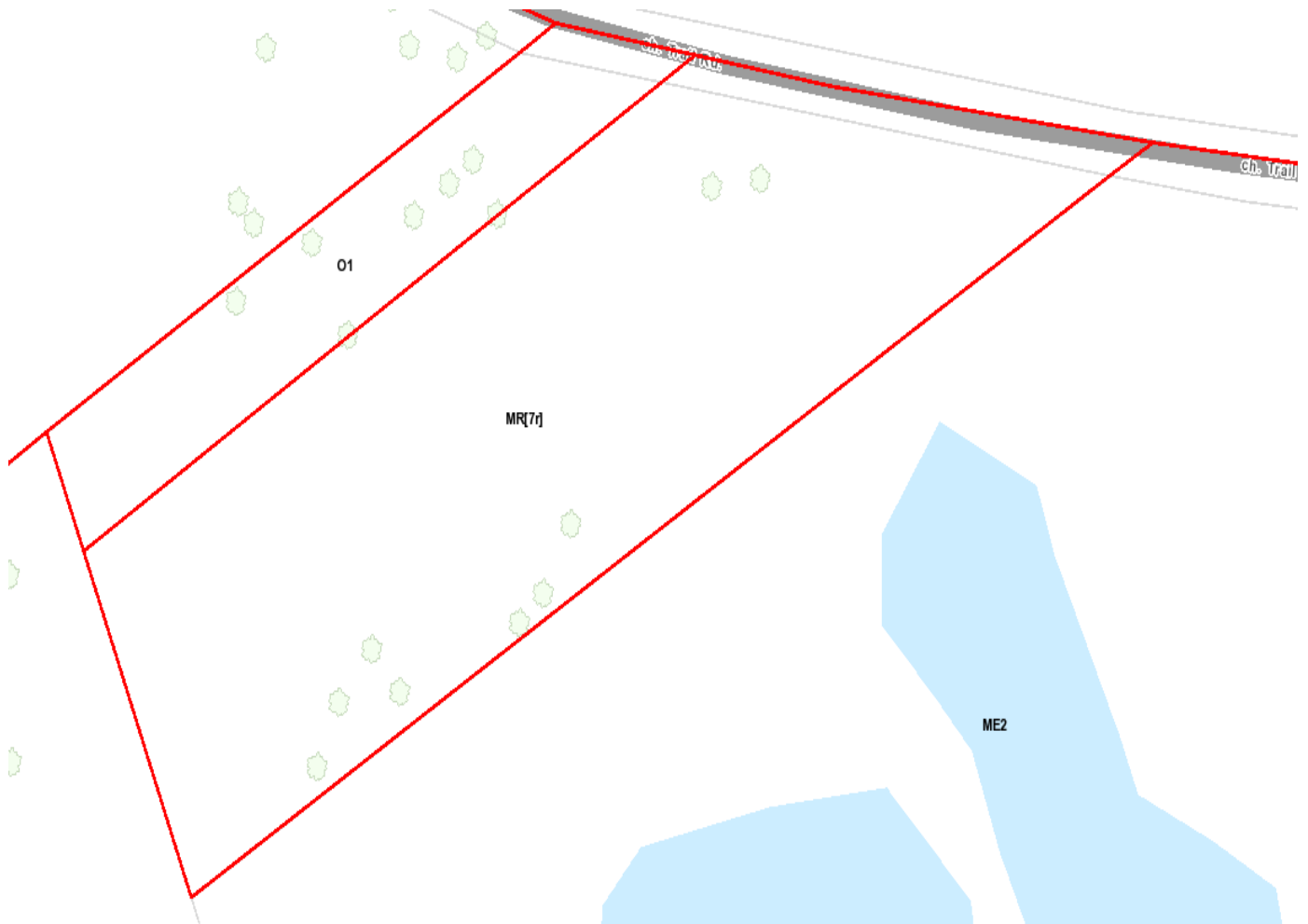
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9 ZONING MAP OF 4380 TRAIL ROAD





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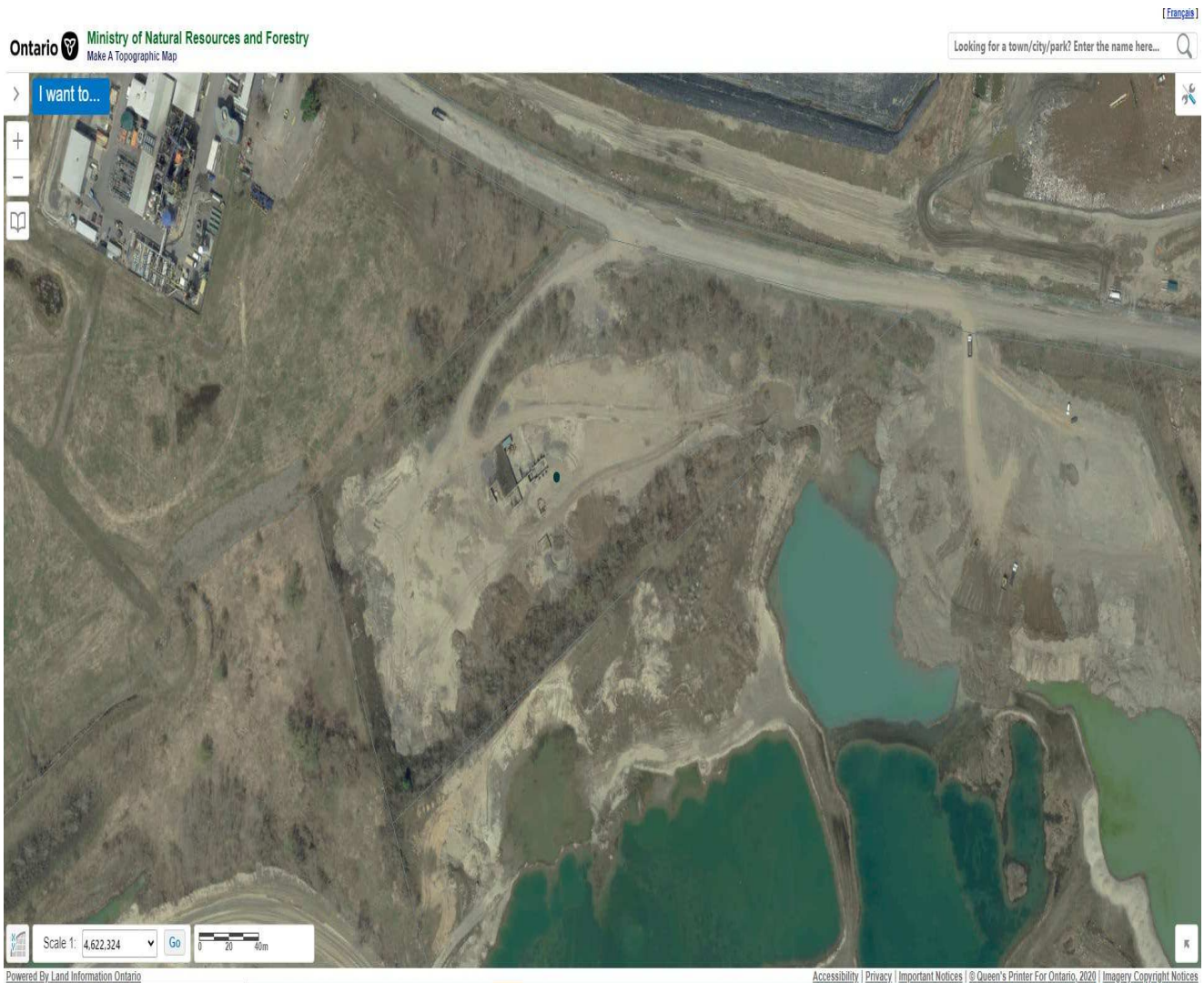
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10 SCALED AREA MAP OF 4380 TRAIL ROAD





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11 UTM EASTING AND NORTHING COORDINATES OF 4380 TRAIL ROAD

The screenshot shows a geolocation application interface. At the top, there are three columns for coordinate input: UTM (Zone 18 T, Easting 439502, Northing 5008807), decimal (Latitude 45.23015°N, Longitude -75.77069°E), and DMS (45° 13' 48.5" N, 75° 46' 24.1" W). Below these are search fields for postal addresses and geolocation services. The main map area shows a topographic map with Trail Rd highlighted in yellow. Two waypoints, A and B, are marked on the road. Waypoint A is at the top of the road, and Waypoint B is further down. A scale bar at the bottom left indicates 50m and 200ft. The bottom right corner of the map area contains the text "Leaflet | © OpenStreetMap contributors (CC-BY-SA)".

On the right side of the interface, there is a "POI / WPT / Waypoints" panel. It contains a list of waypoints:

- *02-B "WP02-B" added
 18 T 439502 5008807
 45.23015°N -75.77069°E
 Elev./SRTM250: 108m
- *01-A "WP01-A" added
 18 T 439779 5008976
 45.23170°N -75.76718°E
 Elev./SRTM250: 108m

Below the list, there are buttons for "remove 02-B", "remove all WPTs", "download WPTs", "download Route", "upload WPTs", and "upload Route". A "Choose File" button is also present with the text "No file chosen".