

Phase I Environmental Site Assessment

4405 & 4409 Innes Road Ottawa, Ontario

Prepared for 1000772034 Ontario Inc.

Report: PE6827-1 November 14, 2024



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EXECUTIVE SUMMARY

Assessment

Paterson Group carried out a Phase I-Environmental Site Assessment (ESA) for the properties addressed 4405 and 4409 Innes Road, in the City of Ottawa, Ontario. The purpose of this Phase I-ESA was to research the past and current use of the subject site and neighbouring properties and to identify any environmental concerns with the potential to have impacted the subject property.

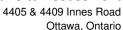
The historical research indicated that the subject property was agricultural land. The property addressed 4409 Innes Road was first developed with a single storey residential dwelling in 1955, and 4405 Innes Road was first developed with a single storey residential dwelling in 1970. In 1996, the building located at 4405 Innes Road changed from residential to commercial use as a chiropractor's office. In 2019, the property at 4409 Innes Road was demolished. The lot remains undeveloped with the exception of a gravel pad in the location of the former residential dwelling, used as additional parking. No potential environmental concerns were identified with the former use of the subject site.

The neighbouring lands along Innes Road and Tenth Line Road were agricultural prior to being developed with residential dwellings commencing circa 1940s. Prior to 1984, the surrounding properties were agricultural land until their development for residential and light commercial use prior to 1984. The surrounding properties, primarily south of Innes Road, were increasingly developed with commercial buildings after 1984. No potential environmental concerns were identified with the former use of the neighbouring properties.

Following the historical review, a site visit was conducted. The site was occupied by the present-day single storey chiropractor's office at 4405 Innes Road and associated asphalt paved and gravel parking lots. No environmental concerns were identified with the current use of the subject property.

The neighbouring properties are occupied by commercial buildings and residential dwellings. Commercials buildings within 150m of the subject property include a retail fuel outlet (RFO) located at 1993 Tenth Line Road, and an auto repair shop located at 385 Vantage Drive. Based on the separation distances between the properties with respect to the Phase I Property, none of the neighbouring properties were considered to pose a potential risk to the subject site.

Based on the findings of the Phase I - ESA, it is our opinion that **a Phase II - Environmental Site Assessment is not required for the subject property.**





Recommendations

Based on the age of the subject structure, asbestos containing building materials may be present within the building. Potential ACMs observed at the time of the site inspection include drywall joint compound, ceiling tiles, ceiling stipple, and vinyl flooring. These building materials were observed to be in good condition at the time of the site inspection and do not represent an immediate concern. An asbestos survey of the buildings should be conducted in accordance with Ontario Regulation 278/05, under the Occupational Health and Safety Act, prior to demolition or renovation activities, if one has not already been conducted.

Lead-based paint may be present on any remaining original surfaces within the building. It is recommended that paint be tested for lead content prior to its disturbance. Major work involving lead-based paint or other lead containing products must be done in accordance with Ontario Regulation 843, under the Occupational Health and Safety Act.



1.0 INTRODUCTION

At the request of 1000772034 Ontario Inc., Paterson carried out a Phase I - Environmental Site Assessment (ESA) for the property addressed 4405 and 4409 Innes Road, Ottawa, Ontario. The purpose of this Phase I ESA was to research the past and current use of the site and study area and to identify any environmental concerns with the potential to have impacted the subject property.

This report has been prepared specifically and solely for the above noted project which is described herein. It contains all of our findings and results of the environmental conditions at this site.

2.0 SITE INFORMATION

Address: 4405 and 4409 Innes Road, Ottawa, Ontario.

Location: Located on the north side of Innes Road.

approximately 80m west of Tenth Line Road, in the City of Ottawa, Ontario. Refer to Figure 1 - Key Plan in the

appendix for the site location.

Latitude and Longitude: 45° 27′ 39″ N, 75° 29′ 22″ W.

Site Description:

Configuration: Rectangular.

Area: 2500 m² (approximate).

Zoning: GM21– General Mixed-Use Zone.

Current Use: The site is occupied by a former single storey

residential dwelling currently used as a chiropractor's

office.

Services: The subject site is situated in a municipally serviced

area.



3.0 SCOPE OF WORK

The scope of work for this Phase I - Environmental Site Assessment was as follows:

Investigate the existing conditions present at the Phase I Property by carrying out a field study and historical review in general accordance with CSA Z768-01 (reaffirmed 2022).
 Present the results of our findings in a comprehensive report.
 Provide a preliminary environmental site evaluation based on our findings.
 Provide preliminary remediation recommendations and further investigative work if contamination is encountered or suspected.



4.0 METHOD OF INVESTIGATION

4.1 Historical Research

The methodology for the Phase I - Environmental Site Assessment program was carried out in two segments. The first consisted of a historical review by researching the past use of the site. This portion of the program was carried out by Paterson personnel. The following is a list of the key information sources reviewed by our firm.

Fed	eral Records
	Maps and photograph (Geological Survey of Canada surficial and subsurface mapping).
	Air photographs at the Energy Mines and Resources Air Photograph Library.
Pro	vincial Records
	MECP document titled "Waste Disposal Site Inventory in Ontario, 1991". MECP Brownfields Environmental Site Registry. Maps (Ontario Geological Survey surficial and bedrock mapping). Office of Technical Standards and Safety Authority, Fuels Safety Branch. PCB Waste Storage Site Inventory.
Mur	nicipal Records
	GeoOttawa Interactive Mapping Tool
Loc	al Information Sources
	Personal Interviews.
Pub	lic Information Sources
	Google Earth. Google Maps/Street View.

4.2 Field Assessment

The second segment of the Phase I-ESA consisted of a site visit that consisted of a walk-through inspection and detailed visual assessment of the environmental conditions of the subject property. The site visit was carried out on November 13, 2024, by personnel from our Environmental Division.



As p	art of the field assessment, the site was inspected for signs of the following:
	Evidence of previous or existing fuel storage tanks.
	On-site use or storage of hazardous materials.
	On-site handling or disposal of liquid or solid waste materials.
	Aboveground piping systems, including pumps, valves, and joints.
	Truck or rail loading or unloading areas.
	Electrical conduits, abandoned pipelines or pumping stations.
	Remnants of old buildings.
	Signs of surficial contamination (i.e. staining, distressed vegetation).
	Unnaturally discoloured, ponded, or flowing waters.
	Surficial drainage, wetlands, natural waterways, or watercourses through
	the property (i.e. ditches, creeks, ponds, poor drainage).
	Any evidence of potable water supply wells or groundwater monitoring wells
	(such as leak detection monitoring wells for underground storage tank
	systems or abandoned systems).
	Any abnormal odours associated with the site, whether from on-site or off-
_	site sources.
	The presence of any recent soil disturbances such as soil removal, filling,
_	tilling, grading, etc.
	Asbestos containing materials (ACMs).
	Urea formaldehyde foam insulation (UFFI).
	Products containing Polychlorinated Biphenyls (PCBs).
	Ozone depleting substances (ODS).
	Lead-containing materials.
	Current use of neighbouring properties.

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5.0 FINDINGS OF THE ENVIRONMENTAL ASSESSMENT

5.1 Historical Review

Air Photograph Research

Historical air photographs from the National Air Photograph Library and GeoOttawa mapping were reviewed in approximate ten (10) year intervals. Based on the review, the following observations have been made:

1946	(Poor Scale) The subject and surrounding properties appear as
	agricultural land, with the exception of some residential dwellings
	along Innes Road and Tenth Line Road.

1960 (Poor Scale, Poor Quality) Two buildings, assumed to be residential dwellings, have been constructed on the subject property. No significant changes have been made to the neighbouring properties since the previous aerial image.

The subject property appears to be developed with two residential dwellings and associated driveways. No significant changes have been made to the neighbouring properties since the previous aerial image.

1984 (Poor Scale) The subject property is unchanged since the previous aerial photograph. Significant residential development has occurred to the northwest of the site. No other changes have been made to the neighbouring properties since the previous aerial image.

The subject property is unchanged since the previous aerial photograph. Additional residential dwellings were constructed to the northeast of the site. Several commercial and light industrial buildings have been constructed further southwest. No other changes have been made to the neighbouring properties since the previous image.

The subject property is unchanged since the previous aerial photograph. Significant commercial development has occurred to the south, including the addition of an auto repair shop. To the east, a retail fuel outlet was constructed. No other significant changes have been made to the subject or neighbouring properties since the previous aerial image.



2022

The subject property is unchanged since the previous aerial photograph. Additional commercial buildings were constructed to the south of the site. No other changes have been made to the surrounding area since the previous aerial image.

The residential dwelling on 4409 Innes Road was demolished. The gravel pad at 4405 Innes Road was replaced with a paved parking lot. Three buildings directly to the east of the site were demolished and replaced with the present-day veterinary hospital, pet groomers and associated paved parking lot. No other significant changes have been made to the site or neighbouring properties since the previous aerial photograph.

Copies of selected aerial images are included in the Appendix.

National Archives

Fire Insurance Plans and city directories are not available for the area of the subject property.

PCB Inventory

A search of provincial PCB waste storage sites was conducted as part of our assessment. No PCB waste storage sites were identified on the subject or surrounding properties.

Ontario Ministry of Environment, Conservation and Parks (MECP)

The MECP document entitled "Waste Disposal Site Inventory in Ontario, 1991" was reviewed as part of the historical research. This document includes all recorded active and closed waste disposal sites, industrial manufactured gas plants and coal tar distillation plants in the Province of Ontario. No active or closed waste disposal sites were identified within the 150m search radius.

A search of the MECP Brownfields Environmental Site Registry (ESR) was conducted as part of this assessment for the site, neighbouring properties and the general area of the site. No Records of Site Condition (RSCs) were identified on properties within the 150m search radius.

Natural Resources Canada (NRCAN)

The Geological Survey of Canada website on the Urban Geology of the National Capital Area was consulted as part of this assessment. Based on this information, bedrock in the area consists of limestone, dolostone, shale, arkose, and sandstone



from the Ottawa Group. Overburden consists of silt and clay, with minor sand and gravel, from glaciomarine deposits.

Technical Standards and Safety Authority (TSSA)

The TSSA, Fuels Safety Branch in Toronto, was contacted on November 7, 2024, to inquire about current and former underground storage tanks, spills and incidents for the subject site and neighbouring properties. A total of eight (8) records were identified for the retail fuel outlet (RFO) at 1993 Tenth Line Road, located approximately 130m to the east of the subject site. The records identified included an active record for a propane fuel storage cylinder exchange, an expired record for a fuel storage cylinder exchange, an active record for a self-serve gasoline station, an expired record for a split-serve gasoline station, and four (4) active records for liquid fuel storage tanks. A total of five (5) were identified records for the RFO at 4358 Innes Road, located approximately 175m to the southwest of the site. The records identified included an active record for a propane fuel storage cylinder exchange, an active record for a self-serve gasoline station, and three (3) active records for liquid fuel storage tanks. Based on the distances from the site, neither of these facilities are considered to pose a risk to the subject property.

A copy of the TSSA correspondence is provided in the Appendix.

Personal Interviews

Ms. Nadia Butt, the perspective purchaser, was contacted via email prior to the site visit. The current property owner, Mr. Robert Leduc, was interviewed through Ms. Butt to answer questions about the property. According to Mr. Leduc, the property at 4405 Innes Road was first built in 1970 and was converted into a chiropractic office in 1996. The property at 4409 Innes Road was first developed in 1955 with a residential dwelling and was later demolished in 2019. Mr. Leduc is not aware of any potential environmental concerns regarding the subject or the neighbouring lands.

5.2 Exterior Assessment

The Phase I ESA site visit was conducted on November 13, 2024, by Paterson personnel from the environmental division. Mr. Ed Belanger, the listing agent, provided access to the property. The site visit included a review of the subject site, including the adjacent lands and their current use.

Site



The subject property is occupied by a single storey building with a basement level at 4405 Innes Road. The exterior of the building is finished with stone and vinyl siding. The roof is sloped and shingled.

The associated asphalt paved parking lot is located south of the building. To the east of the clinic, a gravel pad is situated in the location of the former residential dwelling at 4409 Innes Road. No remnants of the residential dwelling demolished in 2019 remain. Landscaped areas occupy the remainder of the Phase I Property.

The site is generally flat, with the regional topography sloping slightly north towards the Ottawa River. Site drainage consists of a combination of infiltration on landscaped areas and sheet flow on the paved surface to catch basins located along Innes Road.

The site is located in a municipally serviced area. No signs of exterior underground or aboveground storage tanks were observed at the time of the site visit. No signs of ponded water, staining, distressed vegetation, or indications of surficial contamination were observed during the exterior assessment of the subject property.

No potential concerns were identified with the exterior of the Phase I Property at the time of the site visit.

Other Potential Environmental Concerns

☐ Fuels and Chemical Storage

No aboveground/underground fuel storage tanks (AST/USTs) were noted at the time of the site visit. It should be noted that an AST previous existed in the basement of the residential dwelling located at 4409 Innes Road. In 2019, the AST was removed when the property was demolished. According to Mr. Leduc, no concerns were noted at the time of its removal. There was no exterior fuel or chemical storage observed on the subject site at the time of the site visit.

No potential environmental concerns with respect to fuels or chemicals were identified on the exterior of the property at the time of the assessment.

□ Polychlorinated Biphenyls (PCBs) and Transformer Oil

A pole-mounted transformer was identified on the north side of Innes Road. At the time of the site visit, the transformer was noted to be in good condition



with no signs of leaks or spills. No concerns were identified with respect to PCBs or transformer oil on the Phase I Property.

■ Waste Management

Solid waste generated on-site is stored in a garbage bin located to the east of the subject building.

5.3 Interior Assessment

The flooring materials in the subject building consisted of fake vinyl hardwood and ceramic tiles, with some carpeted rooms in the basement. Walls consist of drywall, with some wood panelling along one wall in the stairwell. The ceilings consist of stippled finish plaster, with suspended tiles in some rooms in the basement. Lighting throughout the building was observed to be incandescent and fluorescent.

No potential environmental concerns were identified within the interior of the Phase I Property at the time of the site visit.

Potentially Hazardous Building Products

□ Asbestos-Containing Materials (ACMs)

Based on the age of the building (1970), asbestos-containing materials (ACMs) may be present within the subject building. Potential ACMs observed include drywall joint compound, ceiling tiles, ceiling stipple, and vinyl flooring. All potential ACMs appeared to be in good condition at the time of the site visit and do not pose a potential concern to the current use of the property.

□ Lead Based Paints

Based on the age of the building (1970), lead-based paints may be present within the subject building. Painted surfaces were observed to be in good condition at the time of the site visit and do not pose a potential concern to the current use of the property.

□ Polychlorinated Biphenyls (PCBs)

Based on the age of the original subject building (1970) it is possible that PCBs were used in its construction. Some fluorescent lighting fixtures were observed in the building, of which any ballasts installed prior to 1980 may contain PCBs. Based on available information and site observations, potential PCB use is not considered to pose a significant environmental risk to the subject property.



□ Urea Formaldehyde Foam Insulation (UFFI)

No signs indicating the presence of UFFI were observed within the structure during our inspection. However, wall cavities were not inspected for insulation type.

Other Potential Environmental Concerns

☐ Fuels and Chemical Storage

No chemicals or fuels were noted on-site with the exception of commercially available cleaning products. No spills or staining were observed in the vicinity.

□ Ozone Depleting Substances (ODSs)

Potential sources of ODSs noted on-site included a refrigerator and a fire extinguisher. These appliances should be regularly serviced and maintained by certified contractors.

■ Wastewater Discharges

Wastewater from the building is discharged to the municipal wastewater system. No floor drains or sump pits were present within the subject building.

5.4 Adjacent Properties

Land use adjacent to the subject site was as follows:

□ North: Residential dwellings, followed by Grassland Terrace and

additional residential dwellings;

☐ South: Innes Road, followed by commercial businesses (restaurant,

bank, dentist office, auto repair shop);

☐ East: Veterinary hospital, followed by Tenth Line Road, and

commercial buildings (retail fuel outlet, restaurant)

☐ West: Residential dwellings.

A retail fuel outlet (RFO) is located at 1993 Tenth Line Road, approximately 130m to the east of the site. An auto repair shop is located at 385 Vantage Drive, approximately 140m to the south. Based on the distances from these properties with respect to the subject site, these properties were not considered to pose a potential risk to the Phase I Property. No other concerns were identified with the



current use of the neighbouring lands. Neighbouring land use is shown on Drawing PE6827-1 – Site Plan.

6.0 CONCLUSION

6.1 Assessment

Paterson Group carried out a Phase I-Environmental Site Assessment (ESA) for the properties addressed 4405 and 4409 Innes Road, in the City of Ottawa, Ontario. The purpose of this Phase I-ESA was to research the past and current use of the subject site and neighbouring properties and to identify any environmental concerns with the potential to have impacted the subject property.

The historical research indicated that the subject property was agricultural land prior to development. The property addressed 4409 Innes Road was first developed with a single storey residential dwelling in 1955, and 4405 Innes Road was first developed with a single storey residential dwelling in 1970. In 1996, the building located at 4405 Innes Road changed from residential to commercial use as a chiropractor's office. In 2019, the building was demolished. The lot remains undeveloped with a gravel pad in the location of the former residential dwelling, used as additional parking. No potential environmental concerns were identified with the former use of the subject site.

The neighbouring lands along Innes Road and Tenth Line Road were agricultural land prior to being developed with residential dwellings commencing circa 1940s. The surrounding properties, primarily south of Innes Road, were increasingly developed with commercial buildings after 1984. No potential environmental concerns were identified with the former use of the neighbouring properties.

Following the historical review, a site visit was conducted. The site was occupied by the present-day single storey chiropractor's office at 4405 Innes Road and associated asphalt paved and gravel parking lots. No environmental concerns were identified with the current use of the subject property.

The neighbouring properties are occupied by commercial buildings and residential dwellings. Commercials businesses within 150m of the subject property include a retail fuel outlet (RFO) located at 1993 Tenth Line Road, and an auto repair shop located at 385 Vantage Drive. Based on the separation distances between the properties with respect to the Phase I Property, none of the neighbouring properties were considered to pose a potential risk to the subject site.



Based on the findings of the Phase I - ESA, it is our opinion that a Phase II - Environmental Site Assessment is not required for the subject property.

6.2 Recommendations

Based on the age of the subject structure, asbestos containing building materials may be present within the building. Potential ACMs observed at the time of the site inspection include drywall joint compound, ceiling tiles, ceiling stipple, and vinyl flooring. These building materials were observed to be in good condition at the time of the site inspection and do not represent an immediate concern. An asbestos survey of the building should be conducted in accordance with Ontario Regulation 278/05, under the Occupational Health and Safety Act, prior to demolition or renovation activities, if one has not already been conducted.

Lead-based paint may be present on any remaining original surfaces within the building. It is recommended that paint be tested for lead content prior to its disturbance. Major work involving lead-based paint or other lead containing products must be done in accordance with Ontario Regulation 843, under the Occupational Health and Safety Act.

Report: PE6827-1 November 14, 2024



7.0 STATEMENT OF LIMITATIONS

This Phase I-Environmental Site Assessment report has been prepared in general accordance with the requirements of CSA Z768-01 (reaffirmed in 2022). The conclusions presented herein are based on information gathered from a limited historical review along with a field inspection program and testing program. The findings of the Phase I are based on a review of readily available geological, historical, and regulatory information and a cursory review made at the time of the field assessment. The historical research relies on information supplied by others, such as, local, provincial and federal agencies and was limited within the scope-of-work, time and budget of the project herein.

Should any conditions be encountered at the subject site and/or historical information that differ from our findings, we request that we be notified immediately in order to allow for a reassessment.

This report was prepared for the sole use of 1000772034 Ontario Inc. Permission and notification from the aforementioned party and Paterson Group will be required to release this report to any other party.

Paterson Group Inc.



Mark D'Arcy, P.Eng.

Report Distribution:

□ 1000772034 Ontario Inc.

Paterson Group

APPENDIX

AERIAL PHOTOGRAPHS
TSSA RESPONSE

FIGURE 1 – KEY PLAN

DRAWING: PE6827-1 - SITE PLAN



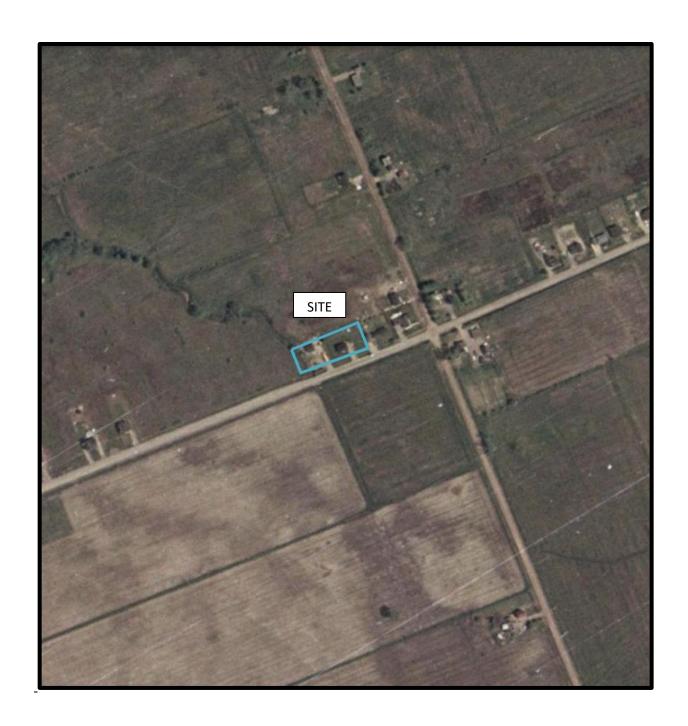
AERIAL PHOTOGRAPH 1946





AERIAL PHOTOGRAPH 1960





AERIAL PHOTOGRAPH 1976





AERIAL PHOTOGRAPH 1984





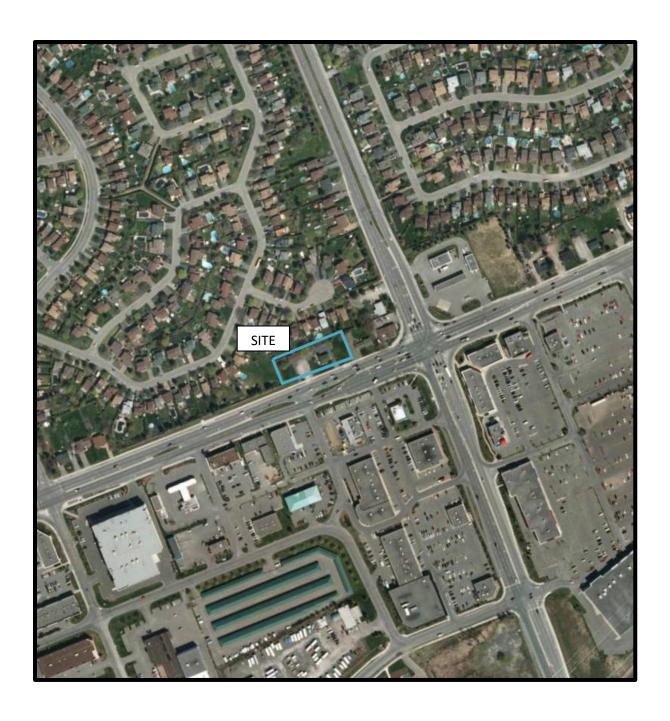
AERIAL PHOTOGRAPH 1991





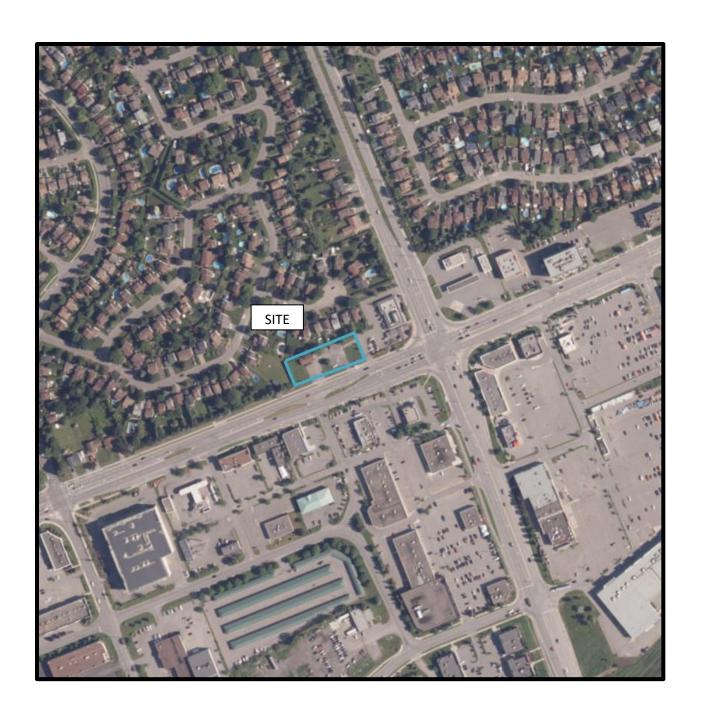
AERIAL PHOTOGRAPH 2002





AERIAL PHOTOGRAPH 2011





AERIAL PHOTOGRAPH 2022





RE: PE6827 - 4405 and 4409 Innes Road

From Public Information Services <publicinformationservices@tssa.org>

Date Thu 11/7/2024 11:04 AM

Amelia Ufholz <aufholz@patersongroup.ca>

External Email: Do not click on links or open attachments unless you trust the sender.

Hello,

RECORD FOUND IN CURRENT DATABASE:

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

Inventory Number	Address .T	City -	Province 💌	Postal Code 💌	Reason Code 💌	Asset Class / Inventory Context	Asset Type / Inventory Item
46798969	1993 TENTH LINE RD	ORLÉANS	ON	K4A 4H8	Active	Propane	FS CYLINDER EXCHANGE
39756511	1993 TENTH LINE RD	ORLÉANS	ON	K4A 4H8	Active	Liquid Fuels	FS GASOLINE STATION - SELF SERVE
11615359	1993 TENTH LINE RD	ORLÉANS	ON	K4A 4H8	Active	FS Liquid Fuel	FS LIQUID FUEL TANK
11627164	1993 TENTH LINE RD	ORLÉANS	ON	K4A 4H8	Active	FS Liquid Fuel	FS LIQUID FUEL TANK
11627185	1993 TENTH LINE RD	ORLÉANS	ON	K4A 4H8	Active	FS Liquid Fuel	FS LIQUID FUEL TANK
11627229	1993 TENTH LINE RD	ORLÉANS	ON	K4A 4H8	Active	FS Liquid Fuel	FS LIQUID FUEL TANK
10308818	1993 TENTH LINE RD	OTTAWA	ON	K4A 4H8	EXPIRED	FS Facility	FS GASOLINE STATION - SPLIT SERVE
31367541	1993 TENTH LINE RD	OTTAWA	ON	K4A 4H8	EXPIRED	FS Facility	FS CYLINDER EXCHANGE

Inventory Number	Address	T City	Province -	Postal Code	Reason Code 💌	Asset Class / Inventory Context	Asset Type / Inventory Item
26279752	4358 INNES RD	ORLÉANS	ON	K4A 3W3	Active	Propane	FS CYLINDER EXCHANGE
10330706	4358 INNES RD	ORLÉANS	ON	K4A 3W3	Active	Liquid Fuels	FS GASOLINE STATION - SELF SERVE
11648268	4358 INNES RD	ORLÉANS	ON	K4A 3W3	Active	FS Liquid Fuel	FS LIQUID FUEL TANK
11657224	4358 INNES RD	ORLÉANS	ON	K4A 3W3	Active	FS Liquid Fuel	FS LIQUID FUEL TANK
11657232	4358 INNES RD	ORLÉANS	ON	K4A 3W3	Active	FS Liquid Fuel	FS LIQUID FUEL TANK

*NO OTHER FUELS 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.

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

Kind regards,

Melanie Fowler | Public Information Releases Agent



Legal 345 Carlingview Drive Toronto, Ontario M9W 6N9

Tel: +1 416-734-3593 | Fax: +1 416-231-4903 | E-Mail: mfowler@tssa.org









From: Amelia Ufholz <aufholz@patersongroup.ca> Sent: Thursday, November 7, 2024 10:28 AM

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

Subject: PE6827 - 4405 and 4409 Innes Road

[CAUTION]: This email originated outside the organisation.

Please do not click links or open attachments unless you recognise the source of this email and know the content is safe.

Good morning,

Could you please complete a search of your records for underground/aboveground storage tanks, historical spills, or other incidents/infractions for the following addresses located in Ottawa, Ontario:

4358, 4405, 4409, 4416 Innes Road

1992, 1993, 2000, 2016 Tenth Line Road

361, 385 Vantage Drive

Thank you,



AMELIA UFHOLZ

Student Field Technician

Environmental Division

TEL: (613) 226-7381 ext. 115 DIRECT: (613) 701-8996

9 AURIGA DRIVE OTTAWA ON K2E 7T9

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FIGURE 1 KEY PLAN



