

### Site Description

<b>Date of Inspection:</b> March 20, 2019		<b>Licence/Permit Number:</b> 625402	
<b>Licensee/Permittee Name:</b> Olympia Sand and Gravel Ltd.			
<b>Site Name:</b>			
<b>Address:</b> 111 Creditstone Road , Concord		<b>E-Mail Address:</b> lpevato@olympia-group.ca; anoveva@erm-group.ca	
<b>Lot(s):</b> Pt 27 & 28	<b>Conc.(s):</b> 2 WHS	<b>Township:</b> CALEDON	
<b>Local Municipality:</b> CALEDON		<b>Mining Claim #:</b>	
<b>County/Region:</b> PEEL R		<b>UTM# (NAD 83):</b>	
<b>Licence/Permit Area (ha):</b> 111.6		<b>Extraction Area (ha):</b> 81.6	
<b>Inspection Category:</b> Complaint		<b>Authority Type:</b> Class A Licence	
<b>Operation Type:</b> Pit		<b>Operating Status:</b> Operating	
<b>Above Water:</b> Yes			

### Critical Inspection Items

Inspection Results:    ✓ Compliance    X Non Compliance    n/a Not applicable    n/i Not Inspected

<b>A. General</b>
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- |                          |            |                     |
|--------------------------|------------|---------------------|
| 1. ✓ Identification Sign | 2. ✓ Gates | 3. ✓ Entrance/Exit: |
|--------------------------|------------|---------------------|

<b>B. Operational</b>
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- |                            |                        |                          |
|----------------------------|------------------------|--------------------------|
| 1. ✓ Berms                 | 2. n/i Setbacks        | 3. X Stockpile Location  |
| 4. n/i Face Heights        | 5. n/i Trees within 5m | 6. n/i Extraction Depth  |
| 7. X Buildings             | 8. n/i Stripping       | 9. n/i Progressive Rehab |
| 10. X Inert Fill           | 11. n/i Undercutting   | 12. n/i GPS Corners      |
| 13. X Boundary Demarcation |                        |                          |

<b>C. Equipment</b>
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- |                          |                       |                         |
|--------------------------|-----------------------|-------------------------|
| 1. n/i Asphalt Plant     | 2. n/i Concrete Plant | 3. n/i Portable Crusher |
| 4. n/i Permanent Crusher | 5. n/i Wash Plant     | 6. n/i Screening Plant  |

<b>D. Environmental</b>
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- |                             |                          |                 |
|-----------------------------|--------------------------|-----------------|
| 1. n/a Pumping              | 2. n/a Discharging (ECA) | 3. n/a Ditching |
| 4. n/a Permit to take Water | 5. n/a ECA 2             | 6. ✓ Scrap      |
| 7. ✓ Dust                   | 8. X Fuel Storage        | 9. n/i ESA      |
| 10. n/a PSW                 | 11. n/i Woodlands        | 12. n/i ANSI    |

<b>E. Recycling</b>
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- |                      |                 |                         |
|----------------------|-----------------|-------------------------|
| 1. n/a Asphalt (RAP) | 2. n/a Concrete | 3. n/a Glass            |
| 4. n/a Bricks        | 5. n/a Slag     | 6. n/a Asphalt Shingles |

<b>F. Monitoring Reports</b>
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- |                         |                         |                         |
|-------------------------|-------------------------|-------------------------|
| 1. n/i Water Monitoring | 2. n/i Noise Monitoring | 3. n/i Blast Monitoring |
| 4. n/i AMP              |                         |                         |

<b>G. Other / Notes</b>
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This inspection occurred as a result of a complaint that was received regarding importation of fill and excess waste accumulation on site (tires, pipes, and other waste). The neighbours were concerned about excavation of aggregate beneath the berms contrary to the site plan, the quality of the fill being imported to the site and the possibility of groundwater contamination. The neighbours were also concerned with the increase in truck traffic and the perceived road hazards associated with the trucks. The undersigned inspector met with representatives of the licensee on Wednesday, March 20, 2019. Specifically the following people were in attendance: Larry Pavato, President; Anna Noveva; and, Mark VanVoorst, P.Eng and Qualified Professional working for Van Voorst Engineering Ltd contracted by the licensee to oversee the importation of fill and compliance with the Off-Site Fill Acceptance Protocol dated March 11, 2014 (an appendix to the site plan and herein referred to as “the Fill Protocol”). At the time of the inspection the entrance fencing and gate were not in place and the sign was on the ground. These are not considered to be compliance items requiring remedial action as a new fence and gate were being installed that day. The sign was to be reinstated once the fence and gate were erected. It is understood that by the time this report was written the perimeter fencing, gate and sign was in compliance again and no longer required discussion. The following items were identified as compliance items that required remedial action: BOUNDARY DEMARCATION (FENCING) – At the time of the inspection there was still perimeter fencing to be erected in accordance with the site plan. All perimeter fencing shall be erected. INERT FILL/BERMS – The site plan requires that all berms be constructed prior to extraction. As was identified during licencing, there is not enough on site overburden and topsoil to construct all of the perimeter berms intended to act as noise and visual barriers off-site. As a result, inert fill was planned to be imported under the Fill Protocol. It appears as though the majority of material used to construct the berms has been off-site fill which ensures a smaller disturbed area on the licence. Generally, the less area that is disturbed on a licence would ensure dust impacts to neighbours would be decreased. AR. 2.00.02 – Variations to Operational Standards, states, 5.7 EROSION CONTROL ON BERMS AND STOCKPILES Establishing vegetation to control erosion on topsoil and overburden stockpiles and berms is important not only to eliminate damage of adjacent lands from sedimentation but also to preserve the quality and quantity of the soil. Variations of this operational standard would not normally be considered. Additionally, the Aggregate Resource of Ontario Provincial Standards (AROPS) – Operational Standards for Licensees 5.7 requires that berms be vegetated as soon as possible once constructed. At the time of the inspection Berm A, Berm B and Berm F were either completed or almost completed. Hydroseeding is expected to take place in early May with a seed mix that meets the requirements of the site plan. While not specifically identified in the Remedial Action section below, it is the understanding of the undersigned inspector that once vegetation is well established on the newly constructed berms that the required tree planting will occur within 1 year. Berm C, Berm D, Berm E, Berm G, Berm H, Berm I and Berm J are expected to continue to be constructed over the next 18-24 months. In accordance with the above referenced operational standard 5.7 all berms shall be seeded and vegetated forthwith once construction has been completed. THE FILL PROTOCOL – First, it should be noted that the Fill Protocol should be amended as there are errors in Section 2 which defines schedule 2 and in the definition of “Table 1 Standards” in Section 1. Currently, the Table 1 Standards means the standards set out under the column entitled “All Other Types of Property Uses” in Table 1 of the “Soil, Groundwater and Sediment Standards for Use under Part XV1 of the Environmental Protection Act” published by the MOE and dated April 15, 2011, as may be amended or replaced pursuant to the provisions of the EPA. The problem is that there is no column with that title. Because the after use for this licence as stated on the rehabilitation page of the site plan is agricultural uses the definition should be changed to mean the standards

set out under the column entitled “Agricultural or Other Property Use” in Table 1 of the “Soil, Groundwater and Sediment Standards for Use under Part XV1 of the Environmental Protection Act” published by the MECP and dated April 15, 2011, as may be amended or replaced pursuant to the provisions of the EPA. Based on the report discussing the quality control samples taken by Van Voorst Engineering Ltd on January 29, 2019 it is apparent the licensee believed the appropriate column would be

“Residential/Parkland/Institutional/Commercial/Community Property Use”. This would not make sense with the planned after use of the site. Section 2 of the Fill Protocol defines acceptable fill. In that definition asphalt is considered acceptable fill. It should be noted that asphalt is recyclable and should be used as a product whenever there is an opportunity. It should also be noted that asphalt can leach into soil and cause contamination that would exceed Table 1 standards for Agricultural or Other Property Use.

There have also been cases in Ontario of crushed concrete material contaminating surface water bodies. These materials should be removed from the definition of acceptable fill. Only inert material (which may include stone, rock, brick or concrete) that meets the Table 1 standards should be considered acceptable fill. It is recommended that the Fill Protocol be reviewed and amended in accordance with Section 9. Section 5.1 of the Fill Protocol requires that quality control audit samples be taken every 10,000 cubic metres. As discussed during the inspection the licensee’s current practice is to only sample every 10,000 cubic metres regardless of the source site. It was recommended by the undersigned inspector that, in order to show due diligence, the licensee should be randomly collecting quality control audit samples somewhere between every 7,000-10,000 cubic metres from each source site. If the source site is not anticipated to ship 10,000 cubic metres then a random quality control sample should be taken from the deliveries originating at that source site. A change to the plan would not be required to implement this recommendation as the current wording allows for required flexibility. The representatives that were present at the meeting agreed to these recommendations verbally and in a subsequent email.

**SOURCE SITE REPORTS** - As part of the inspection 2 of the 8 source site reports require to be submitted to the licensee prior to approval to ship fill in accordance with section 3.3 of the Fill Protocol were reviewed by the undersigned inspector as a random sample. The first report was from a source site referred to as “The Well”. The letter signed by a Qualified Professional states that all parameters for source site samples met the Table 1 standards for Residential/Parkland/Institutional/Commercial/Community Property Use however some of the sample results state that the samples were not taken at the same address as the source site. Additionally, there was no report that discussed the source site investigations, what other samples were taken on the site, the exact location of the samples that were taken, any other source of possible contamination in the area, etc. The report only consisted of a letter and soil sample results. This report did not meet all the requirements of the report required by Section 3.3 of the Fill Protocol. The second report reviewed was for a source site referred to as “The Grange Side Road”. While the report appeared complete and met the requirements of Section 3.3 of the Fill Protocol the sample results at this location were only compared to Table 2 residential standards and not Table 1 standards at all. As a result, neither of the source site reports seem to comply with section 3.3 of the Fill Protocol.

**REVIEWING PROFESSIONAL** – It was discussed during the inspection that Mark Van Voorst, a Qualified Professional (QP) as defined by O. Reg 153 of the Environmental Protection Act, was just recently hired and that moving forward he will be reviewing the source site reports for completeness and compliance with the Fill Protocol prior to issuing approval documents to the generators of the fill to import fill onto this site. The QP must review the source site reports for all prior approvals to ensure that the quality of the fill being imported to the site meets Table 1 Standards for Agricultural or Other Property Use and reconsider whether the source site fill should be

accepted on the licence. A report of his review shall be submitted to the undersigned inspector or Ben Keen, Aggregate Technical Specialist for review. **Moving forward, any deficient source site report that does not meet the standard as stated in the Fill Protocol shall be considered non-compliance** of the site plan and a contravention of Section 15 of the Aggregate Resources Act. **STOCKPILE LOCATION – An MNRF Aggregate Technical Specialist gave permission, contrary to the note in the site plan,** for extraction of aggregate in the location of the operational road required to access Area 1. As Area 1 is currently being used to stage imported fill, the stockpiles of sorted aggregate product are being stored in Area 7 and in what appears to be the location where berm C and/or Berm D are to be located. Anna Noveva provided direction that **the stockpiles of product will be moved within the next two months** and that Area 7 will be restored with the construction of the berms. No further extraction on the licence is permitted until all the berms are constructed. Based on the estimated timeline of 18 months to complete the berms, **extraction of aggregate is not expected to begin on this licence until the fall of 2020 or the spring of 2021.** **FUEL STORAGE –** The site plan requires that the fuel tank be on an impervious pad and located in Area 1. The fuel tank is currently safely installed to the standards of the Technical Standards and Safety Authority and the Ministry of Labour in a temporary location. The fuel tank is intended to be moved by the licensee within the next month now that the road has been extracted to the appropriate elevation. If the fuel tank is not moved a site plan amendment must be submitted for consideration by the MNRF. In the meantime a remedial action date to have the fuel tank moved is provided below. **BUILDINGS –** A transport trailer and a recreational vehicle trailer are located on the site in a temporary storage location for equipment. These are considered buildings and must be removed from the site. The shipping containers intended to form part of the construction of the noise barrier in Area 1 for the crushing operations do not need to be removed from the site but should be moved to Area 1 as soon as possible.

### Remedial Action for Non-Compliance Items

Item	Section (Aggregate Resource Act / Provincial Standards)	Remedial Action Required	Remedial Action Date
Boundary Demarcation	ARA Section 15, AROPS 5.1 , Site Plan	All perimeter fencing shall be erected.	May 3, 2019
Inert Fill/Berms	ARA Section 15, AROPS 5.7	The constructed berms that have been fully constructed shall be vegetated.	June 30, 2019
Inert Fill - QP Review of Source Sites	ARA Section 15, Site Plan, Off-Site Fill Acceptance Protocol	A report summarizing the findings of the QP source site review and actions to be taken shall be submitted to the undersigned inspector or Ben Keen, Aggregate Technical Specialist.	June 30, 2019

Stockpile Location	ARA Section 15, Site Plan	All stockpiles of aggregate product shall be removed from the site or moved to Area 1 in accordance with the requirements of the site plan.	September 15, 2019
Fuel Storage	ARA Section 15, Site Plan	The impermeable pad shall be constructed and the fuel storage tank moved to the location indicated on the Site Plan.	June 30, 2019
Buildings	ARA Section 15, Site Plan	The recreational vehicle trailer and the transport trailer shall be removed from the site.	May 3, 2019

### Inspection Results

**Satisfactory (Site in Compliance):** No  
**Remedial Action Required by Licensee/Permittee:** Yes

### Delivery/Attachments/Referral

**Delivered By:** Mail:  EMail:  Personal:   
**Discussed/Accompanied by:**  
**Referred To:** Ministry of the Environment and Climate Change:   
Ministry of Labour:   
Fisheries and Oceans Canada:   
Ministry of Northern Development and Mines:   
**Other:**  
**Reason for referral:**

### Aggregate Inspector Information

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