



Stantec Consulting Ltd.
100-300 Hagey Boulevard
Waterloo ON N2L 0A4

June 9, 2025 revised August 27, 2025
161424098

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6783 Wellington Road 34, RR 22
Cambridge ON N3C 2V4

Dear Alex

Reference: Topsoil Sampling Results – Southwestern Corner of 42 Lowes Road West, Guelph, Ontario

Stantec Consulting Ltd. (Stantec) was retained by Reid's Heritage Homes (RHH) to provide environmental support during redevelopment for the Argyle Village property in Guelph, Ontario. The development included the property formerly identified as 182 Dawn Avenue at the southwestern corner of the development (herein referred to as the 'Site'). The address for the overall development is 42 Lowes Road West.

Stantec understands that approximately 1,800 m³ of topsoil was stripped from the Site at 182 Dawn Avenue in October 2024 and was exported to an agricultural property at 6958 Wellington Road 34, in Puslinch Ontario. The purpose of this letter is to summarize the environmental quality of the exported topsoil. The Site was historically used for residential purposes and no potentially contaminating activities (PCAs) were identified by Stantec in the area where the topsoil was removed.

Stantec completed a soil sampling program for Argyle Village and as part of that program two boreholes were advanced on the Site in April 2021 (BH/MW02-21 and BH09-21) located within the area of the topsoil removed and exported to 6958 Wellington Road 34. Shallow soil samples, representative of topsoil collected from 0 to 0.6 m below ground surface (m BGS) were submitted for laboratory analysis of metals and inorganics (samples BH02-21 SS1 and BH09-21 SS1). The attached table summarizes the laboratory analytical results.

For quality assurance/quality control (QA/QC) purposes, soil samples were collected following strict sampling procedures. Samples were uniquely labeled, and control was maintained through use of chain of custody forms. Samples were collected in laboratory-supplied containers and preserved by packing with ice in insulated coolers and submitted to Bureau Veritas in Mississauga, Ontario for laboratory analysis. The laboratory certificates of analysis indicated that internal laboratory QA/QC process results were acceptable.

The topsoil is not considered to be excess soil and is therefore not subject to the excess soil requirements of Ontario Regulation 406/19; however, for due diligence purposes the laboratory results representative of the topsoil were compared with the Ontario Regulation 406/19 Excess Soil Quality Guidelines (ESQS) referenced in O.Reg. 406/19 for an agricultural land use in a potable groundwater condition (Table 2.1 ESQS). Concentrations of analyzed parameters for the two shallow soil samples were less than the Table 2.1 ESQS and were less than the Ontario Regulation 153/04 (O.Reg.153/04) Table 1 Site Condition Standards for an agricultural land use. Based on this, the environmental quality of the topsoil is suitable for use at an agricultural property and therefore was considered suitable for reuse at 6958 Wellington Road 34.

Reference: Topsoil Sampling Results – Southwestern Corner of 42 Lowes Road West, Guelph, Ontario

Site-specific standards were not required to be developed using the O.Reg.406/19 beneficial reuse assessment tool (BRAT) tool or using a risk assessment under O.Reg. 153/04, and no risk assessment was needed, as the analytical results for the topsoil met the Table 1 SCS and Table 2.1 ESQS.

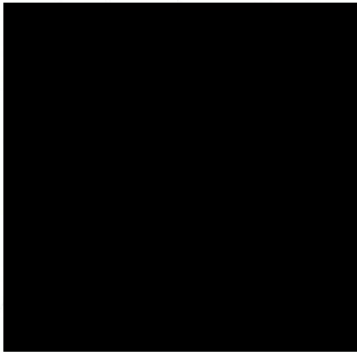
Stantec understands that the topsoil was exported from the Site to 6958 Wellington Road 34 in Puslinch and is current stockpiled for beneficial reuse as top dress as we understand the receiving property was identified to be deficient in topsoil. The addition of the topsoil was to support the creation of additional farmable land. No further topsoil import is anticipated for the property at 6958 Wellington Road 34 and therefore a fill management plan is not required.

A Control Plan has been prepared by others for RHH and was attached with the site alteration application. Stantec has reviewed the Control Plan and has no further recommendations. In our opinion, further revisions to the Control Plan to meet the requirements outlined in Schedule B of the Site Alteration By-Law 2023-057 are not warranted given that the topsoil has already been imported to the Site, has been confirmed to be of suitable environmental quality, is being used to support the creation of additional farmable land, and no further soil import is planned for the Site.

Given that the topsoil is already present and stockpiled on the Wellington Road property, the environmental quality has been confirmed suitable for the intended re-use, no further topsoil import is anticipated and based on the details for re-use included in the Control Plan it is the QPESA's opinion that no further environmental work is required and it will not be necessary to have a QPESA present on-site for future topsoil grading activities.

We trust that the above information meets your current requirements. This letter is subject to the attached limitations. If you have any questions on the above information, please contact the undersigned.

Stantec Consulting Ltd.



Erika Ryter M.A.Sc., P.Eng., QPESA
Principal – Environmental Services
Phone: 905-369-1041
Erika.Ryter@stantec.com

Attachments:

- Appendix A Limitations
- Appendix B Site Plan and Summary of Analytical Results

Reference: Topsoil Sampling Results – Southwestern Corner of 42 Lowes Road West, Guelph, Ontario

Appendix A Limitations

This report documents work that was performed in accordance with generally accepted professional standards at the time and location in which the services were provided. No other representations, warranties or guarantees are made concerning the accuracy or completeness of the data or conclusions contained within this report, including no assurance that this work has uncovered all potential liabilities associated with the identified property.

This report provides an evaluation of selected environmental conditions associated with the identified portion of the property that was assessed at the time the work was conducted and is based on information obtained by and/or provided to Stantec at that time. There are no assurances regarding the accuracy and completeness of this information. All information received from the client or third parties in the preparation of this report has been assumed by Stantec to be correct. Stantec assumes no responsibility for any deficiency or inaccuracy in information received from others.

The opinions in this report can only be relied upon as they relate to the condition of the portion of the identified property that was assessed at the time the work was conducted. Activities at the property subsequent to Stantec's assessment may have significantly altered the property's condition. Stantec cannot comment on other areas of the property that were not assessed.

Conclusions made within this report consist of Stantec's professional opinion as of the time of the writing of this report and are based solely on the scope of work described in the report, the limited data available and the results of the work. They are not a certification of the property's environmental or geotechnical condition. This report should not be construed as legal advice.

This report has been prepared for the exclusive use of the client identified herein and any use by any third party is prohibited. Stantec assumes no responsibility for losses, damages, liabilities or claims, howsoever arising, from third party use of this report.

This report is limited by the following:

- Regulatory criteria in effect at the time the assessment was completed.
- Results pertain only to locations tested.
- Assessment of environmental conditions in exterior portions of the Site.

The locations of any utilities, buildings and structures, and property boundaries illustrated in or described within this report, if any, including pole lines, conduits, water mains, sewers and other surface or sub-surface utilities and structures are not guaranteed. Before starting work, the exact location of all such utilities and structures should be confirmed and Stantec assumes no liability for damage to them.

The conclusions are based on the site conditions encountered by Stantec at the time the work was performed at the specific testing and/or sampling locations, and conditions may vary among sampling locations. Factors such as areas of potential concern identified in previous studies, site conditions (e.g., utilities) and cost may have constrained the sampling locations used in this assessment. In addition, analysis has been carried out for only a limited number of chemical parameters, and it should not be inferred that other chemical species are not present. Due to the nature of the investigation and the limited data available, Stantec does not warrant against undiscovered environmental liabilities nor that the

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sampling results are indicative of the condition of the entire site. As the purpose of this report is to identify site conditions which may pose an environmental risk; the identification of non-environmental risks to structures or people on the site is beyond the scope of this assessment.

Should additional information become available which differs significantly from our understanding of conditions presented in this report, Stantec specifically disclaims any responsibility to update the conclusions in this report.

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Appendix B Site Plan and Summary of Analytical Results

Table 1
Summary of Soil Analytical Results
Topsoil Characterization
Southwestern Corner of Argyle Village Development – 42 Lowes Road, Guelph ON, Reid's Heritage Homes

Sample Location				BH02-21	BH09-21
Sample Date				9-Apr-21	8-Apr-21
Sample ID				BH02-21 SS1	BH09-21 SS1
Sample Depth				0 - 0.6 m	0 - 0.6 m
Sampling Company				STANTEC	STANTEC
Laboratory				BV	BV
Laboratory Work Order				C195534	C195534
Laboratory Sample ID				PHH712	PHH730
Sample Type	Units	Ontario SCS	Ontario SQS - APP 1		
General Chemistry					
Available (CaCl2) pH	S.U.	5-9/5-11 _{s12} ^A	n/v	7.46	7.20
Cyanide (Free)	µg/g	0.051 ^A	0.051 _{s7} ^B	<0.01	<0.01
Electrical Conductivity, Lab	mS/cm	0.47 ^A	0.7 ^B	0.19	0.23
Moisture Content	%	n/v	n/v	15	17
Sodium Adsorption Ratio (SAR)	none	1 ^A	5 ^B	0.23 SDC	0.20 SDC
Metals					
Antimony	µg/g	1 ^A	7.5 _s ^B	<0.20	<0.20
Arsenic	µg/g	11 ^A	11 ^B	3.6	4.5
Barium	µg/g	210 ^A	390 _a ^B	51	56
Beryllium	µg/g	2.5 ^A	4 _a ^B	0.40	0.48
Boron	µg/g	36 ^A	120 _s ^B	<5.0	5.1
Boron (Available)	µg/g	n/a ^A	1.5 _s ^B	0.40	0.49
Cadmium	µg/g	1 ^A	1 _a ^B	0.59	0.72
Chromium	µg/g	67 ^A	160 _a ^B	12	15
Chromium (Hexavalent)	µg/g	0.66 ^A	8 ^B	<0.18	<0.18
Cobalt	µg/g	19 ^A	22 _s ^B	4.8	4.7
Copper	µg/g	62 ^A	140 _s ^B	10	17
Lead	µg/g	45 ^A	45 ^B	44	45
Mercury	µg/g	0.16 ^A	0.24 ^B	<0.050	0.050
Molybdenum	µg/g	2 ^A	6.9 _s ^B	0.55	<0.50
Nickel	µg/g	37 ^A	100 _s ^B	9.1	11
Selenium	µg/g	1.2 ^A	2.4 _s ^B	<0.50	<0.50
Silver	µg/g	0.5 ^A	20 _s ^B	<0.20	<0.20
Thallium	µg/g	1 ^A	1 _a ^B	0.095	0.11
Uranium	µg/g	1.9 ^A	23 _s ^B	0.65	0.74
Vanadium	µg/g	86 ^A	86 ^B	25	27
Zinc	µg/g	290 ^A	340 _a ^B	190	260

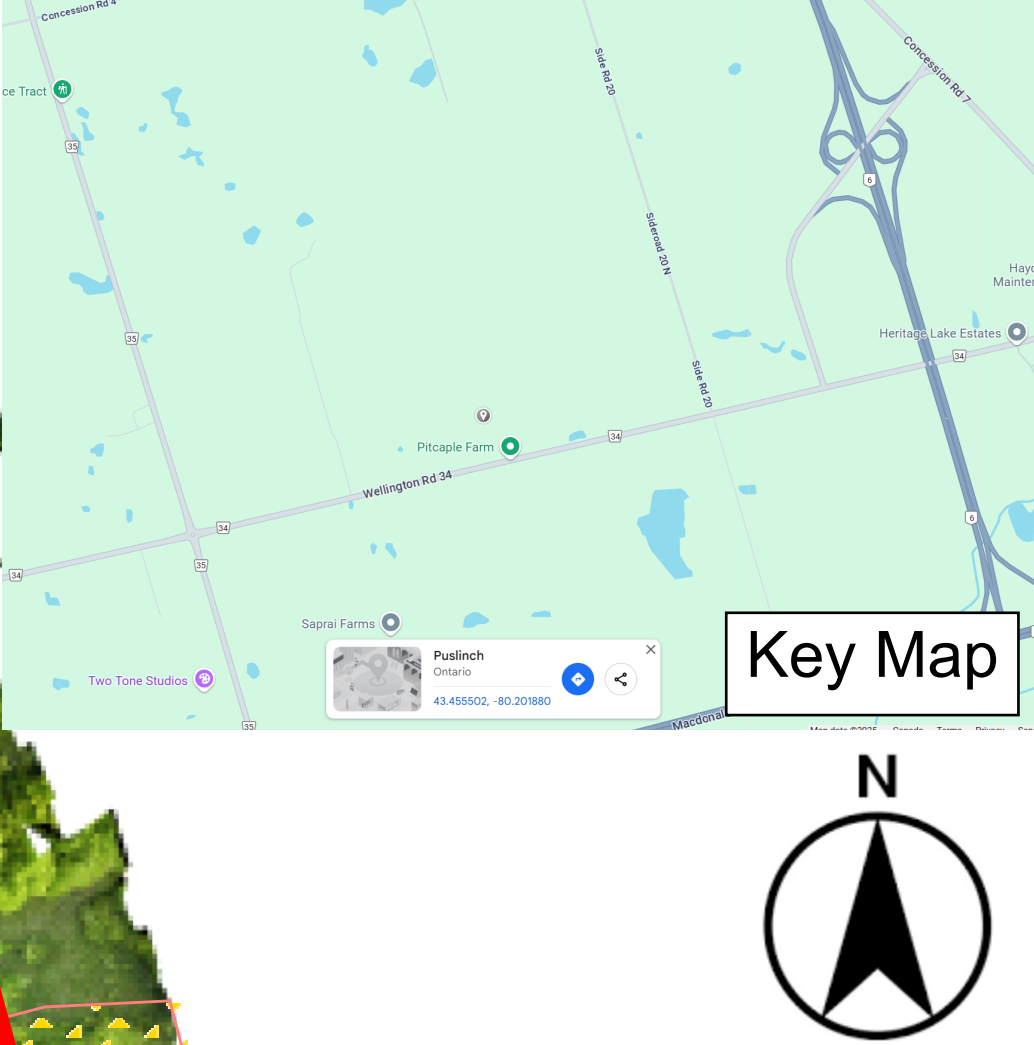
Notes:

Ontario SCS ^A	Soil, Ground Water and Sediment Standards for Use under Part XV.I of the Environmental Protection Act (MOE, 2011) Site Condition Standards (SCS)
Ontario SQS - APP 1 ^B	Table 1 - Full Depth Background Standards for Agricultural or Other Property Use Excess Soil Quality Standards, Ontario Ministry of the Environment, Conservation and Parks (2024), Appendix 1 - Generic Excess Soil Quality Standards TABLE 2.1: Full Depth Excess Soil Quality Standards in a Potable Ground Water Condition, Volume Independent, Agricultural or Other Property Use
6.5 ^A	Concentration exceeds the indicated standard.
15.2	Measured concentration did not exceed the indicated standard.
<0.03	Analyte was not detected at a concentration greater than the laboratory reporting limit.
n/v	No standard/guideline value.
-	The boron standards are for hot water soluble extract for all surface soils. For subsurface soils the standards are for total boron (mixed strong acid digest), since plant protection for soils below the root zone is not a significant concern.
a	Leachate analysis is required only for contaminants that are identified as contaminants of potential concern in excess soil (as specified in subsection 1 (7) in Section A of PART II of Ontario ESQS).
s7	Criterion applies to Cyanide.
s12	The criteria for pH in surface soils (0 to 1.5 m) is 5 - 9, whereas the criteria for pH in sub-surface soils (> 1.5 m depth) is 5 - 11.
s16	For surface soil, the boron standard is for hot water soluble extract. For subsurface soil, the standard is for total boron (mixed strong acid digest), as ecological criteria are not considered.
SDC	Sodium was not detected. To report SAR the sodium detection limit was used in the calculation. This value represents a maximum ratio.

Control Plan

6958 Wellington Road 34

Township of Puslinch ON N3C 2V4



Property Limit
Area- 59 hectares

Approximate Limits of GRCA
Regulated Area

Limits of Field Enhancement Area
17,000 m2 +/-
Place Topsoil @ 0.15m Average
Depth

Line Length		524.260 Meters
Slope Length		524.260 Meters
Horizontal Area		16,710.382 Sq Meters
Slope Area		1.7 Hectares
Calc Slope Area		Sq Meters Hectares
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# 3 Point Editor		
North	4,811,902.609	East 564,798.918

# 1 Point Editor		
North	4,811,806.930	East 564,830.331

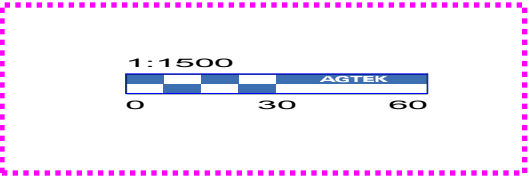
Existing 1800 m3 +/- Topsoil
Stockpile
To be screened and placed on
Field Enhancement Area @
average depth of 0.15m
Stone by-product from screening
to be crushed and placed on
existing laneway

Existing House
Shed Barn

Approximate Limits of GRCA
Regulated Area

Stone By-product
of Screening to
be crushed and
placed on
laneway to
average depth of
100mm

Approximate Limits of
GRCA Regulated Area





June 2, 2025

Pennbridge Farms
6958 Wellington Rd 34
Township of Puslinch, ON
N3C 2V4

Re: Haul Route Acknowledgement for 6958 Wellington Rd 34 (Roll #23-01-000-002-01900-0000)

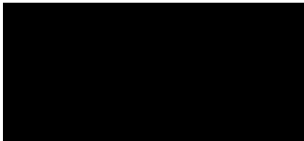
Your application for a Haul Route Permit at the property municipally known as 6958 Wellington Rd 34 has been approved. The requirements for your Haul Route Permit are as follows:

- **No further hauling is permitted.**

Below is the identified haul route used:

42 Lowes Road W>Gordon St>Maltby Rd W>Wellington Rd 54>Wellington Rd 34.

Thank you,



Mike Fowler
Director of Public Works and Parks
mfowler@puslinch.ca
519-763-1226 extension 220