



**PATERSON  
GROUP**

July 19, 2023  
File: PE4033-LET.02R

**Ottawa Community Housing**  
731 Chapel Street  
Ottawa, Ontario  
K1N 8A1

Attention: **Mr. Dylan Bennett**

Subject: **City Comments – Phase I ESA Update  
(File No. D02-02-23-0022 and D07-12-23-0034)  
(Eastern Part of) 201 Friel Street  
Ottawa, Ontario**

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Dear Sir,

Paterson Group Inc. (Paterson) has prepared this letter in response to the comments issued by the City of Ottawa (City) regarding the Phase I Property, herein referred to the eastern part of 201 Friel Street, Ottawa, Ontario. Specifically, the responses addressed herein pertain to the Phase I-ESA Update comments (Comments 1.6 through 1.9).

## **Phase I-ESA Comments**

### ***Comment 1.6.***

*This report is to be read in conjunction with the 2017 report. Please provide the 2017 report.*

### **Paterson Response 1.6.**

The 2017 Phase I ESA report is enclosed with this letter.

### ***Comment 1.7.***

*Based on the report, it is our opinion the presence of USTs shall not be ruled out as PCAs creating APECs onsite due to the following:*

- a). *According to the ESAs, three (3) fuel USTs are reported for the Bell property at 393 Rideau St, which is located immediately south of the subject property.*





*Paterson indicates “based on the cross-gradient location of this property, these tanks are not considered to represent an area of potential environmental concern for the subject site.” However, Paterson also indicates “groundwater is expected to flow to the north.*

- b). *According to the Geotechnical Investigation completed by Paterson (2017): There is a presence fill material onsite, of up to 1.5 m in depth and its quality remains unknown. As per O. Reg. 153/04, the presence of fill material of unknown quality shall be considered a PCA onsite, which requires further investigation.*

### **Paterson Response 1.7.**

- a) For clarification, the TSSA identified 3 UST ‘records’ at the nearby property Bell property (393 Rideau Street). We collected additional information regarding the public records of the aforementioned records registered with the TSSA. According to the supplemental information we received, the original UST was of metal construction and installed in 1992, which was when the Bell building was constructed. This tank was then replaced in 2005 with a double-wall fibreglass tank, followed by a newer double-wall fibreglass tank instrumented with a Veeder-Root Leak Detection System installed in 2006.

Site observations confirm that there is currently one UST located on the north side of the Bell property. The UST nest is equipped with several monitoring wells located at the corners of the tank nest.

Given the short duration of use of the first 2 USTs, and use of the current tank with the leak detection equipment, in absence of any reported spills, incidences or leaks, it is our opinion that there is a very low risk of any potential environmental impact occurring from the use of these USTs, especially since any such leaks would have been identified and reported during the removal of the previous USTs or by the detection equipment.

Furthermore, the closest corner of the UST nest is located more than 20m away from the southwest corner of the Phase I Property (eastern part of 201 Friel Street). Based on the groundwater data we have for the neighbouring properties (151 Rideau Street to the east and from 112 Nelson Street to the west), coupled with the underlying impermeable (silty-clay) overburden in the immediate area, we remain of the opinion that the UST on the Bell property does not pose a risk or represent an APEC on the Phase I Property, such that a Phase II ESA is not required to address this item.



- b) The fill material identified in the 2017 geotechnical investigation is not considered to represent a PCA or imported fill material of unknown quality. The boreholes were placed inside the current building structure (condemned parkade). The fill material in question, identified beneath the concrete slab of the building was clearly being used as engineered fill that was imported from an aggregate pit. Therefore, the imported fill material identified during the geotechnical investigation is not considered fill of unknown quality, and as such, it is not an on-site PCA (or APEC) that would warrant further investigation.

**Comment 1.8.**

*An HLUI is required. The updated HLUI will include additional sources beyond those included in the previous database, making the inclusion of this record search even more important.*

*Although a municipal historic land use database is not specifically listed as required environmental record in O. Reg 153/04, Schedule D, Part II states the following, which are the specific objectives of a records review:*

- i. To obtain and review records that relate to the Phase I (One) property and to the current and past uses of and activities at or affecting the Phase I (One) property in order to determine if an area of potential environmental concern exists and to interpret any area of potential environmental concern.*
- ii. To obtain and review records that relate to properties in the Phase I (One) study area other than the Phase I (One) property, in order to determine if an area of potential environmental concern exists and to interpret any area of potential environmental concern.*

*In addition, we do not agree with the statement “no new information from the HLUI database would reveal any new off-site PCAs that would result in APECs on the Phase I Property”.*

**Paterson Response 1.8.**

A new HLUI submission has been requested as part of the environmental records update of the Phase I ESA Update report. A response from the City was received on June 2, 2023. The HLUI database identified one activity addressed at the Phase I Property in 2012. The activity was listed under a private individual, who likely used the residence as a business office for technical services. This listed activity is not a PCA. Several off-site activities, particularly former retail fuel outlets (RFOs), automotive garages and printing facilities were identified along Rideau Street and Chapel Street.



These historical off-site activities were identified more than 100 m away and cross gradient from the Phase I Property. Based on their orientation and location, these off-site PCAs are not considered to represent APECs on the Phase I Property. A copy of the HLUI search results is included in the Phase I ESA Update report, which is appended to this letter.

**Comment 1.9.**

*An RSC is required due to increase in sensitive use of the parking area for this proposal.*

**Paterson Response 1.9.**

Based on our historical findings and last use of the Phase I Property (Eastern Part of 201 Friel Street), a record of site condition (RSC) is not required, as the site has never been used for “commercial use” as defined by Part I, subsection 3(b) of the O.Reg. 153/04.

As discussed in the Phase I ESAs, the Phase I Property is occupied by a condemned parkade that was used for private parking associated with the residential apartment building situated on the western part of 201 Friel Street, and therefore, considered residential. An RSC is not required for the proposed residential redevelopment of Phase I Property.

We trust that this submission satisfies your current requirements. Should you have any questions please contact the undersigned.

Sincerely,

**Paterson Group Inc.**

Mandy Witteman, M.A.Sc., P.Eng.

Mark D'Arcy, P.Eng., QP<sub>ESA</sub>



**Enclosure**

- 2017 Phase I ESA Report (PE4033-1)
- Phase I ESA Update Report (PE4088-LET.01R)

