

Risk Management Plan

RMP Identification Number:

2019-07-31-CTC-RMP-24

This Risk Management Plan (RMP) has been prepared in accordance with guidance set out by Halton Region to meet the requirements of *the Clean Water Act, 2006*, S.O. 2006. C. 22 (*The Clean Water Act, 2006*) and applies to the property and activities described herein.

The objectives of the Risk Management Plan are:

- Prepare a binding agreement, between Halton Region and the Landowner/Operator of Activities that are considered to be a significant threat to municipal drinking water sources in Halton Region, to describe Significant Threat Activities on the property and the existing or additional Risk Management Measures proposed to be implemented to manage the Activities such that they cease to be or do not become a significant threat to municipal drinking water sources.
- Document the responsibilities of the Landowner/Operator and Halton Region in implementing the Risk Management Plan.

The Risk Management Plan contains the following mandatory components:

- Part 1 – Property Information
- Part 2 – Source Protection Information
- Part 3 – Landowner/Operator Responsibilities
- Part 4 – Halton Region Responsibilities
- Part 5 – Agreement on a Risk Management Plan

The Risk Management Plan contains the following mandatory schedules:

- Schedule 1 – Summary of Consultation
- Schedule 2 – Risk Management Measures
- Schedule 3 – Emergency Spill Response Plan
- Schedule 4 – Communications Plan
- Schedule 5 – Special Considerations.

Parts 1 to 5 of the RMP Template and Schedule 1 are to be completed by the Halton Region Risk Management Official (RMO) based on information to be provided by the Landowner/Operator and on information exchanged during mandatory Consultation. Responsibilities for the Landowner/Operator outlined in Schedules 2 through 5 are considered to be mandatory Risk Management Measures under *The Clean Water Act, 2006*. Schedule 2 documents Site Activities and Risk Management Measures that are or will be in place to manage identified significant threat activities to drinking water sources.

Part 1 – Property Information				
1	Property Address:	1 Rosetta Street, Georgetown, ON, L7G 3P1		
2	Tax Assessment Roll Number(s):	241501000210000		
		Landowner (Primary Contact)	Operator / Tenant	Operator / Tenant
3	Name (Print Name): Relation to Property:	Yaniv Geler Property Manager		
4	Facility/Business Name (if applicable):	1 Rosetta Street (Halton Hills) GP Limited		
5	Mailing Address (If different then above):	2200 Yonge Street, Suite 805, Toronto, ON, M4S 2C6		
6	Day-time Telephone #: Email:	416-417-5702 yaniv@byronequities.com		
7	Describe current land use	Type	Describe Activities	
		Residential		
		Agricultural		
		Commercial	Commercial businesses with associated parking area on the subject property (see Schedule 1 for details)	
		Industrial	Industrial businesses with associated parking area on the subject property (see Schedule 1 for details)	
		Institutional		
		Other		
8	Describe previous activities that may have occurred on the property over the past 10 years	Commercial / Industrial – auto body hobby repair shop, wood flooring production, wood furniture production, drone development, metal workshop, and storage		
9	List and provide copies of environmental studies (i.e. Phase I/II ESA) completed for the property?	No known environmental investigations have occurred in the past 10 years		

Part 1 – Property Information (Detailed Layout)

1 Rosetta Street, Georgetown, ON



Part 3 – Landowner/Operator Responsibilities

3-1	The Landowner/Operator warrants that the current or planned site activities and risk management measures as outlined in Schedule 2 (attached) are or will be in-place and agrees to maintain these activities.
3-2	The Landowner/Operator agrees to implement the Risk Management Measures as per Schedule 2 (attached).
3-4	The Landowner/Operator agrees to implement the Emergency Spill Response Plan as outlined in Schedule 3 (attached).
3-5	The Landowner/Operator agrees to implement the Communications Plan as outlined in Schedule 4 (attached).
3-6	The Landowner/Operator agrees to implement other actions as defined as Special Considerations in Schedule 5 (Attached).
3-7	The Landowner/Operator acknowledges that this RMP cannot be transferred to another person without written consent of Halton Region's Risk Management Official (RMO). The RMO requires thirty (30) days' notice prior to delivery of any written consent. The RMO may re-negotiate the Risk Management Plan with the new Landowner/Operator, if required.
3-8	The Landowner/Operator agrees to notify the RMO and Halton Region's Risk Management Inspector (RMI) of new activities or proposed changes to site activities (including chemical usage and storage) or changes to in-place or proposed risk management measures in order that this Risk Management Plan can be updated.
3-9	The Landowner/Operator agrees to provide access to all buildings and facilities to the Halton Region RMO/RMI to conduct inspections as requested by the RMO/RMI. Inspections by the RMO/RMI may be scheduled in advance in accordance with actions as defined in Schedule 3 (attached) or may be without notice.
3-10	The Landowner/Operator agrees to carry out actions outlined in any Orders that may be issued in the future by the Halton Region RMO/RMI pertaining to this RMP.
3-11	The Landowner/Operator acknowledges that it may be responsible to pay any fines/penalties (plus tax and interest) issued by the RMO or RMI.
3-12	The Landowner/Operator acknowledges that the RMP and any amendments thereto are available to the public in accordance with provincial law. The Landowner/Operator shall identify any records or amendments pertaining to the RMP that the Landowner/Operator considers proprietary information for exclusion from public disclosure.


Part 4 – Halton Region Responsibilities

4-1	On agreement of this RMP, the RMO and RMI shall implement a mandatory inspection program as deemed necessary to confirm that the activities and circumstances outlined in Schedule 2, cease to be or do not become a Significant Threat to Municipal Drinking Water.
4-2	The RMO will be available to negotiate changes and updates to this RMP. Requests for change may be instigated by either party.
4-3	In the event of a change in property/business ownership, the RMO shall respond to notification and negotiate a RMP with the new Landowner/Operator, as necessary.
4-4	The RMI shall advise the Landowner/Operator of non-compliance with the RMP requirements and if necessary issue an Order outlining actions and time frames to be followed to achieve compliance.
4-5	In the event of non-compliance with an issued Order, the RMO may cause work to be done to comply with an issued Order.
4-6	The RMO agrees to provide feedback to the Landowner/Operator on potential modifications to the RMP or to the status of “Significant Drinking Water Threats”.
4-7	The RMO shall review and assess submissions from the Landowner/Operator as per the Communications Plan (Schedule 4, attached).
4-8	The RMO shall include information for this Risk Management Plan in the Annual Report to be submitted to the Source Protection Authority.
4-9	The RMO may disclose records relating to this RMP to the public in accordance with provincial laws. The RMO shall not disclose records that the Landowner/Operator has identified as proprietary information.

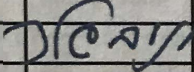
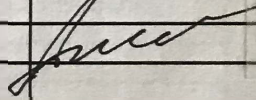
Part 5 – Agreement on a Risk Management Plan

Landowner/Operator/Tenant						Risk Management Official
<p>We agree to carry out the Risk Management Plan as described above and as detailed in Schedules 2 to 5, effective as of the date signed by the Risk Management Official below. By signing this agreement we acknowledge that we are aware of our rights to appeal the decisions of the Halton Region Risk Management Official to the Environmental Review Tribunal and we confirm that we have the authority to bind the corporation.</p>						<p>Halton Region agrees with the Risk Management Plan as described above and as detailed in Schedules 2 to 5. The Risk Management Official has the authority to bind The Regional Municipality of Halton.</p>
Print Name:	Yaniv Geler	<i>Maxim Umanskiy</i>				Daniel Banks
Signed:		<i>[Signature]</i>				
Position:	Property Manager	Representative - Kingsbury Technologies Inc.	Representative - Furniture Renew	Representative - Pistons In Motion	Representative / Tenant	Risk Management Official
Company:	1 Rosetta Street (Halton Hills) GP Limited	Kingsbury Technologies Inc.	Furniture Renew	Pistons In Motion	Oleg Datsyuk	Halton Region sourcewater@halton.ca 905-825-6000
Date:		<i>09/07/19</i>				

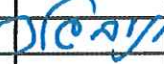


Part 5 – Agreement on a Risk Management Plan

Landowner/Operator/Tenant						Risk Management Official
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Print Name:	Yaniv Geler		Scott Page			Daniel Banks
Signed:						
Position:	Property Manager	Representative - Kingsbury Technologies Inc.	Representative - Furniture Renew	Representative - Pistons In Motion	Representative / Tenant	Risk Management Official
Company:	1 Rosetta Street (Halton Hills) GP Limited	Kingsbury Technologies Inc.	Furniture Renew	Pistons In Motion	Oleg Datsyuk	Halton Region sourcewater@halton.ca 905-825-6000
Date:			7/15/2019			

Part 5 – Agreement on a Risk Management Plan

Landowner/Operator/Tenant						Risk Management Official
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Print Name:	Yaniv Geler					Daniel Banks
Signed:						
Position:	Property Manager	Representative - Kingsbury Technologies Inc.	Representative - Furniture Renew	Representative - Pistons In Motion	Representative / Tenant	Risk Management Official
Company:	1 Rosetta Street (Halton Hills) GP Limited	Kingsbury Technologies Inc.	Furniture Renew	Pistons In Motion	Oleg Datsyuk	Halton Region sourcewater@halton.ca 905-825-6000
Date:	July 11 2019					

Part 5 – Agreement on a Risk Management Plan

Landowner/Operator/Tenant						Risk Management Official
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Print Name:	Yaniv Geler			DOUGLAS CARL		Daniel Banks
Signed:						
Position:	Property Manager	Representative - Kingsbury Technologies Inc.	Representative - Furniture Renew	Representative - Pistons In Motion	Representative / Tenant	Risk Management Official
Company:	1 Rosetta Street (Halton Hills) GP Limited	Kingsbury Technologies Inc.	Furniture Renew	Pistons In Motion	Oleg Datsyuk	Halton Region sourcewater@halton.ca 905-825-6000
Date:	July 11 2019			JULY 15/19		JULY 31, 2019

Risk Management Plan

Schedule 1

Summary of Consultation

RMP Identification Number (ID):	2019-07-31-CTC-RMP-24
<p>This schedule provides a summary of the Consultation (current and historic details, existing and future practices, include: map of property and associated activities) carried out for the Risk Management Plan between the Landowner/Operator who is engaged in an activity that is a significant threat to drinking water and the Halton Region Risk Management Official.</p>	
Consultation Date: May 24, 2019	
Type of Consultation (i.e. on-site, telephone, etc.): On-Site	
Attendees: John McIntosh, Dan Banks, Yaniv Geler (landowner)	
<ul style="list-style-type: none"> - Mixed use building containing both commercial and industrial businesses with associated parking area on the subject property - Paved parking area surrounding building with cracks / potholes less than 600cm² - Parking area generally slopes away from the building. On the west side of building, the parking area / driveway slopes towards the south (towards railroad). No downspouts drain onto surface. - Single catchbasin located on northern portion of property - Winter maintenance contractor responsible for snow removal and salt application in parking area. No salt application on stairs or walkways. - No salt is stored outdoors - Building contains a number of self-contained units that are rented by the landowner to a variety of commercial and industrial businesses (currently 8 vacant units used for equipment storage – no fluids) including: <ul style="list-style-type: none"> - Kingsbury Technologies Inc: (HWIN Generator ID ON3913154 – 211L aromatic solvents – liquid industrial waste) wood flooring staining including approx. 100 (5 gallon) containers of stains stored on concrete flooring. Evidence of spills from containers. - Furniture Renew: Furniture repair shop containing paint strippers and stains. - Pistons in Motion – hobby auto repair shop containing a number of vehicles with associated oils, solvents, cleaners. Evidence of oil staining on concrete floors - Oleg Datsyuk – General machining of ferrous metals, steel, and aluminum. Degreasers and lubricants stored within unit - Balch Exploration Consulting – develops geophysical survey equipment. Contains one 3.78L of varsol - No fuel visible on property during time of visit. No spill kits on-site. 	



Risk Management Plan

Schedule 2

Risk Management Measures

RMP Identification Number (ID):	2019-07-31-CTC-RMP-24
The Landowner/Operator agrees to implement the following Risk Management Measures at the Property:	

APPLICATION, HANDLING, AND STORAGE OF ROAD SALT AND SNOW STORAGE

Type of Measure	Risk Management Measures	Measures applicable at Subject Property			
		Yes (in place or will be implemented)	No (provide justification)	Timeline for Implementation	Responsible for Implementing Measure
Product Application Practices	Product application practices and rates shall be adjusted to suit current and forecasted conditions for each product application event. The amount of residual road salt on the impervious areas will be assessed prior to product application and removed where excessive application has occurred.			Oct. 1, 2019	Winter Maintenance Contractor Kingsbury Technologies Inc.
	Use an alternative to dry sodium chloride (rock salt) when current and forecasted temperatures is lower than -10 degrees Celsius (alternatives: de-icing materials with lower working temperatures such as Magnesium Chloride, Calcium Chloride, Calcium Magnesium Acetate, Potassium Acetate, plant-based additives, or abrasives). Application rates will be adjusted accordingly for each product used.			Oct. 1, 2019	Winter Maintenance Contractor
	Snow shall be cleared prior to the product application in order to maximize the effectiveness and minimize the quantity of de-icer that needs to be applied.			Oct. 1, 2019	Winter Maintenance Contractor Kingsbury Technologies Inc.
	When feasible and under appropriate conditions, the use of pre-treated or pre-wetted de-icing materials instead of dry de-icing materials will be considered. Application rates of de-icing materials will be adjusted accordingly.			Oct. 1, 2019	Winter Maintenance Contractor

Product Application Practices	<p>Salt (chloride) application logs shall be completed by the person applying salt (chloride) for winter maintenance at the time of each application event. Logs should include the following information:</p> <ul style="list-style-type: none"> • Date, start time • Person(s) responsible for application • Current and forecasted weather conditions (temperatures) • Pavement conditions prior to application (clear, icy, snow covered etc.) • Total surface area that received salt (chloride) application • Type(s) of salt (chloride) or other materials applied • Application rate(s) • Total amount of salt (chloride) applied • Type(s) of equipment used • Date of last equipment calibration <p>Logs will be provided to Landowner after each winter season and maintained by Landowner for a period of 3 years. Application logs will be made available to the RMO/RMI upon request.</p>			Oct. 1, 2019	<p>Winter Maintenance Contractor</p> <p>Yaniv Geler</p> <p>Kingsbury Technologies Inc.</p>
	<p>Product application practices shall be annually reviewed to identify potential reductions in material use.</p>			Oct. 1, 2019	<p>Winter Maintenance Contractor</p>
Equipment Operation Practices	<p>The use of properly functioning ground speed controlled spreaders shall be considered on the property. Ground speed controlled spreaders shall be calibrated at the start of each season and after any repairs. Calibration logs maintained for a period of 3 years from calibration date and made available to the RMO/RMI upon request.</p>			Oct. 1, 2019	<p>Winter Maintenance Contractor</p>
	<p>Tenders, Requests for Proposal (RFPs), and advertisements for winter maintenance services on the subject property shall list the use of ground speed controlled spreading equipment as a preferred requirement for salt application on parking areas and walkways.</p>			Oct. 1, 2019	<p>Yaniv Geler</p>

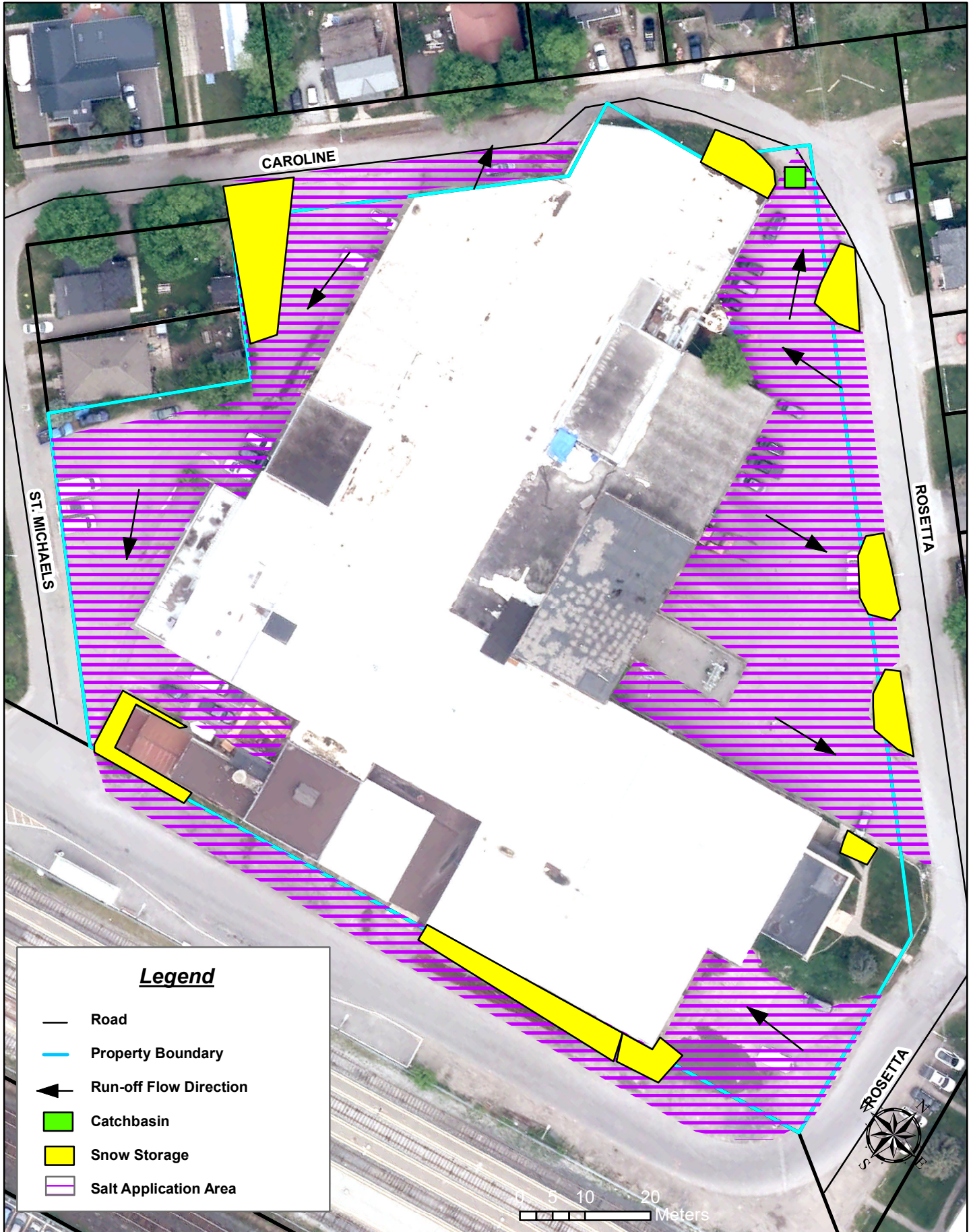
Snow Storage	Snow storage areas shall not be located on top of catchbasins, in ditches, etc. so as to not obstruct drainage at the property (see Winter Operation Map).			Oct. 1, 2019	Winter Maintenance Contractor
	Snow storage area(s) shall be located on the low side of impermeable areas to alleviate the formation of ice as a result of meltwater (see Winter Operation Map).			Oct. 1, 2019	Winter Maintenance Contractor
	Snow shall not be stored in areas where it will impede the operations associated with Emergency Services or create visual obstructions (see Winter Operation Map)			Oct. 1, 2019	Winter Maintenance Contractor
	Litter, debris, salt and sediment from snow storage areas shall be collected and disposed of at the end of every winter maintenance season to prevent these materials from being released into the environment. Clean-up of the property shall occur at the end of every winter control period to ensure any residual salt is not introduced into the environment through precipitation, run-off and snowmelt.			Oct. 1, 2019	Winter Maintenance Contractor
Salt Storage	During each winter event assess condition of salt storage container and confirm location as per Winter Operation Map. Any identified deficiencies will be rectified by the conclusion of the next winter event.		N/A - Salt is not stored outside		
	In the event of a spill, implement Emergency Spill Response Plan in accordance to Schedule 3			Oct. 1, 2019	Winter Maintenance Contractor
	Store salt in a secured, closed container on an impermeable surface.		N/A - Salt is not stored outside		
On-Site Operations	Designated site personnel shall respond immediately to clean up spills using appropriate materials. Prevention of spilled anti-icing/de-icing agents from reaching drains, sewers, soil, or surface water shall be a priority.			Oct. 1, 2019	Winter Maintenance Contractor

<p style="text-align: center;">On-Site Operations</p>	<p>Maintain a Winter Operation Map that outlines:</p> <ul style="list-style-type: none"> - de-icing product application areas - product storage areas - snow storage locations - location of drains - location of downspouts and gutters - potential migratory pathways (i.e. wells, ditches, depressions, storm sewers, etc.) <p>A copy of the Winter Operation Map should be posted in an accessible location with the spill response plan. Notify RMI of any proposed changes to Winter Operation Map. An up-to-date Winter Operation Map shall be made available to the RMO/RMI upon request.</p>	<p>See attached Winter Operation Map</p>		<p>Oct. 1, 2019</p>	<p>Winter Maintenance Contractor</p>
	<p>Roof gutters and downspouts shall be directed away from impervious areas.</p>	<p>N/A - All downspouts currently connected to stormsewer</p>			
	<p>Paved areas shall be maintained to ensure impermeability including fill cracks/potholes (greater than or equal to 600cm² and 8cm in depth) prior to upcoming winter season. Prevents areas of ponding water (particularly around raised catchbasins) and infiltration of meltwater through cracks /openings.</p>			<p>Oct. 1, 2019</p>	<p>Yaniv Geler</p>
<p style="text-align: center;">On-Site Operations</p>	<p>Low traffic and under used or high risk areas and entrances shall be closed where deemed feasible by the property manager during the winter control period to limit salt application</p>			<p>Nov. 1- Apr. 30th</p>	<p>Yaniv Geler</p>

Education & Training	Any person responsible for salt application shall complete the Smart About Salt training and renew every 5 years. In addition, winter maintenance contractors will be required to maintain Smart About Salt certification. Smartaboutsalt.com			Oct. 1, 2019	Winter Maintenance Contractor
	All staff applying road salt shall be provided with annual orientation training based on practices outlined in Transportation Association of Canada's entitled: Syntheses of Best Practices Road Salt Management (specifically Chapter 10 - Salt Use on Private Roads, Parking Lots and Walkways). http://www.tac-atc.ca/sites/tac-atc.ca/files/site/doc/resources/roadsalt-10.pdf			Oct. 1, 2019	Winter Maintenance Contractor
	Orientation training records shall be maintained and made available for review by Halton Region's RMO/RMI on request.				
Winter Maintenance Management	The property owner/operator shall ensure that the risk management measures contained in the Risk Management Plan (RMP) are considered during winter maintenance contract negotiations. A clause shall be included in the winter maintenance contract to ensure the RMP is implemented by the contractor.			Oct. 1, 2019	Yaniv Geler
	When a new winter maintenance contract is negotiated a written agreement stating that the contractor understands, and will implement the terms of the RMP will be signed by the contractor and property owner/manager at the time of contractor hire. A copy of the agreement shall be made available upon request by RMO/RMI.			Oct. 1, 2019	Yaniv Geler
	To encourage the efficient use of road salt, winter maintenance contracts negotiated for the Site shall be based upon the unit price per event or lump sum per season (avoid contracts based on total amount of road salt applied by the contractor).			Oct. 1, 2019	Yaniv Geler

Winter Operation Map

1 Rosetta Street, Georgetown, ON - 2019-07-31-CTC-RMP-24



Salt Application Log Sheet

Subject Property Information		Winter Maintenance Company Information (if applicable)	
Address:		Address:	
Name:		Name:	
Primary Contact:		Primary Contact:	

Date	Material Used (kg)	Salt Application Method	Application Location	Pavement Condition	Weather	Staff Initials	Comments
EXAMPLE	S(10)	S / PS	P / W / R	SC	C	JM	Temp (-5°C), shovelled, snowblowed, applied salt using spreaders

Codes:

Material Used	S=salt	G=grit/sand	L=liquid	A- alternative
Salt Application Method	S=spreader	PS=push spreader	H=Hand thrown	N=nothing
Application Location	P=parking area	W=walkway	S=stairs	R=road/driveway
Pavement Condition	C=clear	SC=snow covered	I=ice	
Weather	C=clear	S=snowing	R=raining	FR=freezing rain

Risk Management Plan ID # : 2019-07-31-CTC-RMP-24

Calibration Dates:

STORAGE OF HAZARDOUS OR LIQUID INDUSTRIAL WASTE

Type of Measure	Risk Management Measures	Measures applicable at Subject Property			
		Yes (in place or will be implemented)	No (provide justification)	Timeline for Implementation	Responsible for Implementing Measure
Storage of Hazardous or Liquid Industrial Waste	Absorbent and/or containment materials shall be available for responding to spills.			Oct. 1, 2019	Kingsbury Technologies Inc. Furniture Renew Pistons In Motion Oleg Datsyuk
	In the event of a spill, implement Emergency Spill Response Plan in accordance to Schedule 3			Oct. 1, 2019	Kingsbury Technologies Inc. Furniture Renew Pistons In Motion Oleg Datsyuk

Storage of Hazardous or Liquid Industrial Waste	Secondary containment must be a minimum of 110% capacity of waste storage capacity			Oct. 1, 2019	Kingsbury Technologies Inc.
	Inspect designated waste storage areas and containers on a recurring basis, maintain inspection logs, and implement preventative maintenance measures to reduce the potential for leaks or spills of hazardous substances from these areas. Logs maintained for a period of 3 years from calibration date and made available to the RMO/RMI upon request.			Oct. 1, 2019	Kingsbury Technologies Inc.
	Collection and removal of the waste will be by a designated contractor specialized in collection and disposal of waste			Oct. 1, 2019	Kingsbury Technologies Inc.
	Comply with all requirements outlined in Ontario Regulation 347: General – Waste Management, including, but not limited to, maintaining copies of manifests for all hazardous or liquid industrial wastes generated on the property. Manifests shall be maintained and made available for review by Halton Region's RMO/RMI on request.			Oct. 1, 2019	Kingsbury Technologies Inc.

Risk Management Plan

Schedule 3

Emergency Spill Response Plan

RMP Identification Number (ID):

2019-07-31-CTC-RMP-24

The Landowner/Operator agrees to carry out the following actions as part of the Contingency & Emergency Response Plan:

- 1) Implement the following Emergency Response Actions in the event of a spill or an uncontrolled release of a chemical that may present a significant threat to drinking water:
 - Undertake emergency response or first aid as required to address immediate physical threats.
 - Undertake actions to contain spreading of the spill.
 - Undertake actions to minimize the ability for chemicals to enter groundwater or surface water.
 - Notify the Halton Region RMO/RMI that a spill or uncontrolled release has occurred via email: sourcewater@halton.ca.
 - Estimate volume of chemicals that may have entered groundwater or surface water.
 - Call Ontario Ministry of the Environment, Conservation and Parks Spills Hot-Line at 1-800-268-6060 (where applicable).

- 2) Keep records of Emergency Spill Response.

Note: Attach existing spill response procedures and supporting documents



Risk Management Plan

Schedule 4

Communications Plan

RMP Identification Number (ID):	2019-07-31-CTC-RMP-24
<p>The Landowner/Operator agrees to carry out the following actions as part of the Communications Plan:</p> <ol style="list-style-type: none">1) Notify the Halton Region RMO/RMI in the event that there is a change to ownership or operator.2) Notify the Halton Region RMO/RMI in the event that there is a need to change or update the Site Activities (Part 2).3) Notify the Halton Region RMO/RMI in the event that there is a need to change or update Risk Management Measures (Schedule 2).4) Notify the Halton Region RMO/RMI in the event that there is a need to change or update to the Emergency Spill Response Plan (Schedule 3).	



Risk Management Plan

Schedule 5

Special Considerations

RMP Identification Number (ID):	2019-07-31-CTC-RMP-24
<p>The Landowner/Operator agrees to carry out the “Special Considerations” as listed below in addition to the responsibilities defined in Schedules 2 through 4 of this RMP:</p> <ol style="list-style-type: none">1) Notify Halton Region’s Risk Management Official or Risk Management Inspector when winter maintenance contractor is hired for the subject property2)3)4)	