
TO: Andrea Sutton

DATE: January 20, 2026

391568 Ontario Inc.
4072 Walker Road, Windsor, ON

PROJECT: CA0046126.8978

Phase Two Environmental Site Assessment - Addendum #1

RE: Walker-Cabana Development, Windsor, Ontario

This Addendum (#1) has been completed by WSP Canada Inc. ("WSP") for 391568 Ontario Inc. (the "Client") for the report entitled *Phase Two Site Assessment, Walker-Cabana Development, Windsor, Ontario*, dated October 2, 2025 (referred to herein as "Report A"). Report A (Phase Two ESA) was completed for the entirety of the future Walker-Cabana Development, which includes three commercial properties at 2375 and 2385 Cabana Road East and 4040 Walker Road, and three industrial parcels of land at 0, 0 and 2415 Cabana Road East in Windsor (hereafter referred to as the Phase Two Property).

To support a Record of Site Condition (RSC) filing for a portion of the Phase Two Property that has been proposed for residential redevelopment (this parcel referred to herein as the "RSC Property"). WSP completed a separate Phase Two ESA report specific to the RSC Property (referred to here as the "Report B"). The RSC Property comprises the northwestern portion of the Phase Two Property, including 2375 and 2385 Cabana Road East, 4040 Walker Road and portions of the two 0, 0 parcels adjacent to 2415 Cabana Road East. As part of the RSC submission for the RSC Property, WSP completed soil remediation work. The RSC submission is being updated for re-submission to the MECP at the issue date of this addendum.

This addendum was completed to provide the Client and the City of Windsor (City) additional information on the Phase Two Property following the issuance of Report A (Phase Two ESA) related to the City's December 22, 2025 letter (and addendum) related to the Stage 2 Planning Consultation for the Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) application. The City's response requested clarification on Report A's conclusions and recommendations related to soil impacts.

As part of the Phase Two ESA activities carried out across the Phase Two Property (including the RSC Property), all soil and groundwater samples were analyzed for volatile organic compounds (VOCs), petroleum hydrocarbons (PHCs), O.Reg. 153/04 metals & Inorganics (M&I) and polycyclic aromatic hydrocarbons (PAHs). No groundwater impacts were identified on the Phase Two Property (including the RSC Property); however, soil contamination was identified at four locations (BH14, MW9, MW11 and S-SA1). This Addendum #1 provides additional details on remediation and/or management of these four noted locations.

RSC Property

As outlined in both Report A and Report B, two areas of soil contamination were located within the RSC Property (at borehole BH14 and monitoring well MW9). Following remedial excavation and confirmatory soil sampling each of these areas are considered to have been remediated, as the measured concentrations of all tested parameters were at or below the relevant site condition standards ("Table 3 RPI SCS"¹). The Phase Two ESA report on the RSC Property (Report B), dated October 3, 2025, summarizes the excavation and landfill disposal of the contaminated soil, as follows,

- Between May 27, 2025 and July 25, 2025, WSP personnel documented the removal of the EC, pH, PAH and metal-impacted soil/fill from the two remediation areas (BH14 and MW9) and collected confirmatory floor and wall samples after the remedial excavations were completed.

¹ Table 3 RPI SCS: Table 3 Generic Site Condition Standards for use in a Non-Potable Groundwater Condition (Residential/Parkland/Institutional Property Use, medium to fine soil texture).

- A total of 203.85 metric tonnes (MT) (120 m³) of impacted soil was transported from the remedial excavations at the RSC Property to the EWSWA Regional Landfill in Essex, Ontario.
- The confirmatory samples from the limits of the two remediation areas (i.e., around BH14, MW9) were submitted for laboratory analysis based on each of the contaminants of concern. As all measured concentrations of the tested parameters, for all of the soil samples collected from the final limits of the remedial excavations, were at or below Table 3 RPI SCS. No further remediation is considered to be required to support the RSC.

Commercial Portion of the Walker-Cabana Property

As outlined in Report A, two areas of soil contamination (located at stockpile sample S-SA1 and monitoring well MW11) were identified within the commercial redevelopment portion of the Phase Two Property (both within the 2415 Cabana Road East parcel). It is WSP's opinion that the most cost-effective and efficient approach is to address these two areas of impact (i.e., S-SA1 and MW11) during construction when suitable equipment is expected to be on-site. Based on feedback from the City, this addendum elaborates on the recommended management approach for the soil impacts identified at S-SA1 and MW11.

S-SA1 Soil Exceedances

Approximately 40 cubic metres (m³) of stockpiled material is present on the east-central portion of the 2415 Cabana Road East property. The stockpiled material is a mixture of granular fill, topsoil, and silty clay. Three samples of the stockpiled material were analyzed as part of the Phase Two ESA. Two of those soil samples had concentrations below Table 3 ICC SCS². However, one stockpile sample (S-SA1) had marginal exceedances of the Table 3 ICC SCS for three parameters: benzo(a)pyrene (BaP), boron-hot water soluble (B-HWS) and lead; all other parameters were detected at concentrations below Table 3 ICC SCS.

MW11 Soil Exceedances

Monitoring well MW11 is located within 30 metres of the Sixth Concession drain, which means the applicable standard would be Table 9 SCS³, which is more stringent than Table 3 ICC SCS. Two soil impacts, Trichloroethylene (TCE) and xylenes were identified at MW11 (sample SA1, 0.3-1.0m, clay/sand fill) above Table 9 SCS (but below Table 3 ICC SCS). The impacts were delineated to 1.0 m based on the analysis of a deeper soil sample from MW11 (sample SA2, 1.0-1.5m, sandy clay). All measured concentrations in sample MW11 SA2 were below Table 3 ICC SCS and Table 9 SCS. As outlined in Report A (Phase Two ESA), groundwater levels measured at MW11 ranged from 1.5 to 1.8 m below ground surface (mbgs). Based on the vertical delineation and groundwater depth, the identified impacts are expected to be limited to relatively shallow fill material and not anticipated to migrate to the groundwater table. As noted above, no groundwater impacts have been identified on the Phase Two Property (including at MW11).

On-Site Management of Soil Exceedances at S-SA1 (Stockpile) and MW11 (in-situ)

Under O.Reg. 153/04, property owners must prevent impacts (i.e., with concentrations exceeding relevant site condition standards) from migrating to neighboring properties but are not obligated to remediate on-site impacts to soil or groundwater provided risks to human or ecological receptors can be appropriately managed. On-site management of impacts to soil quality can be completed by the property owner by either removing the impacts (i.e., remediation) or otherwise eliminating the pathway between areas of impact and human/ecological receptors.

There are no known historical or active source(s) for these impacts (i.e., a leaking tank, spill, etc.). Based on this, and the overall results of the Phase Two ESA activities completed across the Phase Two Property, the identified impacts are inferred to be relatively localized.

² Table 3 ICC SCS: Table 3 Generic Site Condition Standards for use in a Non-Potable Groundwater Condition (Industrial/Commercial/Community Property Use, medium to fine soil texture).

³ Table 9 SCS: Table 9 Generic Site Condition Standards for use within 30 m of a Water Body in a Non-Potable Groundwater Condition (Residential/Parkland/Institutional/Industrial/Commercial/Community Property Use, medium to fine soil texture).



WSP recommends the following to manage the impacted soil at S-SA1 (stockpile) and MW11 during construction:

- S-SA1 (stockpile): The soil impacts identified at S-SA1 (stockpile) are considered to be non-volatile and relatively immobile. As an alternative to off-site disposal, and to eliminate the potential exposure pathways, the material could be placed in a covered berm (for landscaping purposes); covered with a geotextile liner and clean soil cap (topsoil) of at least 0.5 m thick. Alternatively, and provided the material is geotechnically suitable, the stockpiled material could be re-used on-site in area(s) that will be paved (i.e., a "hard cap"), which would also eliminate the pathway for human or ecological receptors. However, should the soil be re-used on-site, it should be placed at least 1.0 m above the groundwater table.
- MW11 SA1 (0.3-1.0m): Impacted soil (as identified in shallow fill material encountered at MW11) excavated during construction could be reused on-site (without any environmental limitations) provided it is placed at least 30 m from the Sixth Concession Drain.

In summary, depending on the final development plan for the parcel, the identified soil impacts associated with S-SA1 and MW11 can be effectively managed on-site without the need for remedial excavation and off-site disposal.

Closure

This Addendum #1 was prepared for the exclusive use of the Client and is intended to be read in conjunction with the Phase Two Report (Report A) issued on October 2, 2025 for the Phase Two Property.

Sincerely,

WSP Canada Inc.

A handwritten signature in purple ink, appearing to read 'Cindy McKee'.

Cindy McKee, P.Geo., QP_{ESA}
Principal, Environmental Geoscientist

A handwritten signature in purple ink, appearing to read 'Carl Schroeder'.

Carl Schroeder, P.Eng., QP_{ESA}
Principal, Environmental Engineer