

ENG-TECH CONSULTING LIMITED

GEOTECHNICAL • ENVIRONMENTAL • MATERIALS TESTING

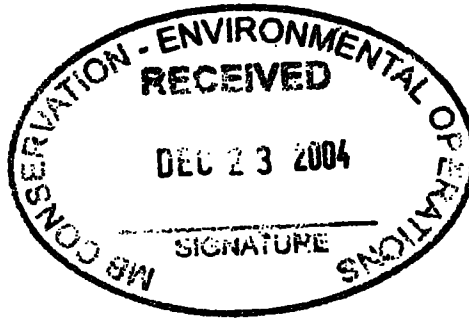
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December 23, 2004

File No.: 03-217-02

Manitoba Conservation
Attn: Randy Webber
123 Main Street
Suite 160
Winnipeg, Manitoba
R3C 1A4



Dear Mr. Webber,

The City of Winnipeg has requested that Manitoba Conservation receive a copy of the Phase I Environmental Site Assessment (ESA) report conducted at #2 Point Douglas Avenue (South) in Winnipeg, Manitoba. Attached are two copies of the report for your files regarding impacted and contaminated sites.

A Phase II ESA is in progress and upon completion a copy of this report will be forwarded to you.

If there are any questions, please call me.

Sincerely,
ENG-TECH Consulting Limited

Clark Hryhoruk
Clark Hryhoruk, M.Sc., P. Eng.
President

Enclosures: Phase I ESA, Final Report - # 2 Point Douglas Avenue (South) (2)

P:\2004\Projects\217COW-General\02(Site_B-#2Point_Douglas-S)\Phase I\Correspondence\04-217-02 Phase I ESA Letter to MB Conservation.wpd



**PHASE I ENVIRONMENTAL SITE ASSESSMENT
FINAL REPORT**

SITE B: # 2 POINT DOUGLAS AVENUE (South)

File 04-217-02



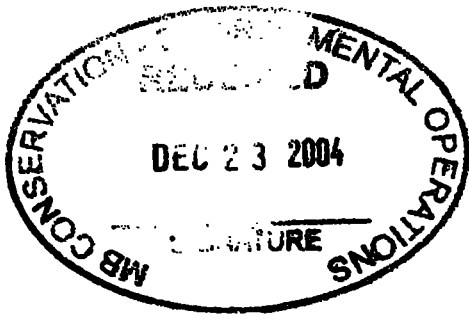
December 2004

SUBMITTED BY:



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EXECUTIVE SUMMARY

ENG-TECH Consulting Limited (ENG-TECH) was retained by the City of Winnipeg to conduct a Phase I Environmental Site Assessment (ESA) of a property known as #2 Point Douglas Avenue (South), Winnipeg, Manitoba, owned by Gateway Industries Ltd. The purpose of the Phase I ESA was to identify, to the extent possible, actual and potential environmental issues and concerns which may have an impact to the Site or users of the Site.

The Phase I ESA consisted of an historical records review of the Site and surrounding properties, a Site reconnaissance to record current Site uses and conditions, interviews with persons knowledgeable about the Site, and an evaluation of the findings. The Phase I ESA was conducted using several published documents and guidelines related to environmental site assessments.

From the Phase I ESA the following was determined:

Site

The historical search revealed that the Site was developed in the early 1940s into a lumber, paper and roofing mill, owned by Building Products of Canada Ltd. In 1985 the Site was purchased by 66702 Manitoba Ltd. and then by Gateway Industries Ltd., the present owner, the same year. However, the Site was occupied by Domtar Construction Materials Ltd. from 1987 to 1990 and finally by Gateway Industries Ltd. until present.

The property currently accommodates an inoperative production facility which formerly produced bulk paper for on-site paper recycling and for the manufacturing into what is commonly known as roofing tar paper, roll roofing and other general paper uses.

Surrounding Land Use

The Canadian Pacific Railway (CPR) line bordering the Site immediately to the north was developed in the late 19th century with general storage facilities being constructed after 1927. The property immediately north of the CPR line has never been developed. It has been used for pulpwood storage, as a snow disposal site by the City of Winnipeg and presently as storage of empty tanks and surplus metal equipment for Gateway Industries Ltd. Areas to the west of the Site are residential housing built in the early 20th century. The construction of the residences varied, but were all pre 1950. The topography of the adjacent lands has not changed significantly since development, excluding the demolishing or alterations of a few buildings.

Potential Environmental Concerns and Issues

Potential environmental concerns and issues which should be addressed are outlined below:

Impact from Adjacent Properties

- The CPR mainline located immediately north of the Site and spur lines on the Site are a potential environmental concern. The surrounding soil may have been contaminated with hydrocarbons.

PCBs

- Five transformers purchased from the United States, are currently stored and not presently in use at the Site. As a condition of the sale the transformers were to be PCB free, however confirming documentation is unavailable.
- Three transformers stored outside near the east end of the property may contain PCBs.
- Nine transformers are located on a concrete pad recently enclosed in a metal shed. In 2002, PCB sampling and testing was conducted at the Site. The testing revealed that all of the samples were below current CCME commercial/industrial criteria but were above the guidelines for residential/parkland sites. No sampling was done with depth below the surface.
- The ballasts in the fluorescent light fixtures in the buildings and the ballasts stored in the electrical supply room in the board mill may contain PCBs if they were manufactured before 1979.

Asbestos

- Several tanks located around the Site have insulation that may contain asbestos.
- The floor tiles located in several of the buildings may contain trace quantities of asbestos fibres.
- The acoustic ceiling tiles located in several of the buildings may contain asbestos fibres.

Petroleum Hydrocarbons

- Hydrocarbon contamination of the soil in the proximity of a 4545 L underground petroleum tank, removed in 1993, is known to exist based on a previous investigation by MacPLAN Environmental Services Ltd. (MacPLAN).
- In 1993 a 2270 L underground fuel tank could not be located, and was therefore not removed. The 1964 Fire Insurance Maps (FIM) show an underground tank southeast of the buildings, near a storage shed. However, the Manitoba Conservation petroleum storage file number 12034 lists a tank of the same volume as being removed in 1990. It is uncertain at this time if the tank has been removed.
- Two (2) 23 500 L Bunker-C fuel tanks are located partially below grade on the west side of Building I. Hydrocarbon contamination of the surrounding soil may have occurred.
- An above-grade light thermal oil tank is located adjacent the rail spurs. Hydrocarbon contamination of the surrounding soil may have occurred.
- Five asphalt tanks are located between Buildings E and K. Hydrocarbon contamination of the surrounding soil may have occurred.
- A pool of reddish brown water with what appears to be oil was noted outside near the centre of the Site.
- During an environmental assessment and subsurface investigation conducted by MacPLAN in 1993, test holes were drilled at locations throughout the Site. The subsurface investigation and

analysis of the soil samples showed the presence of metals, BTEX and PAHs on the property. The report recommended further inspection, sampling and analysis of underground storage tank locations, the asphalt tank area, the river bank and other areas not accessible by the drill rig.

- The four monitoring wells at various locations throughout the Site, installed for the previous property owner, should be sampled and tested for hydrocarbons.

Metals

- Due to the stockpiling of surplus metal equipment throughout the Site, surface soils should be tested for metals concentrations.

Leachate

- Leachate testing should be conducted on the asphaltic shingles embedded in the riverbank to assess if they pose an environmental risk.

Other Potential Environmental Issues and Concerns

- Two-thirds of the basement of the roofing felt paper operation building is covered in tar from a burst pipe. This may create hazardous working conditions or be a concern if the building is demolished.

A Phase II ESA is recommended to investigate the above-mentioned issues and concerns. This would include a drilling and soil sampling program, as well as sampling and testing of water, oil and tile samples throughout the Site.

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1.0 INTRODUCTION

1.1 Terms of Reference

ENG-TECH Consulting Limited (ENG-TECH) was retained by the City of Winnipeg to conduct a Phase I Environmental Site Assessment (ESA) of a property known as #2 Point Douglas Avenue (South), Winnipeg, Manitoba. The Site is registered under six Certificates of Title, specifically numbers 1569469, 1569475, 1569477, 1569478, 1569481 and 1569144 in the City of Winnipeg Land Titles Office. The legal description of the property is available in Appendix C. In this report the property will subsequently be referred to as the Site.

ENG-TECH received authorization to proceed with the investigation from Ed Dolhun, Land Development Co-coordinator for the City of Winnipeg on September 17, 2004.

1.2 Objectives

The purpose of the Phase I ESA was to identify, to the extent possible, actual and potential environmental issues and concerns which may have an impact to the Site or users of the Site.

1.3 Scope of Work and Limitations

The scope of work for this project consisted of:

- A review of historical records pertaining to the Site and surrounding properties.
- A Site reconnaissance to record current Site uses and conditions.
- Interviews with persons knowledgeable about the Site.
- An evaluation of the findings.
- An ESA report outlining the work conducted.

This Phase I ESA provides an overview of both past and present potential environmental concerns at the Site. However the Phase I ESA is limited by the availability of information at the time of the assessment. Therefore, it is possible that unreported (or not recorded) activities could have impacted the environmental condition of the Site and consequently could not be identified at the time of the assessment. The Phase I ESA is limited by time, budgetary constraints, and the reliability of information from others. Verification of some information may not always be possible.

1.4 Methodology

The Phase I ESA was conducted using guidelines outlined in the Canadian Standards Association (CSA) Z768-01 (Phase I Environmental Site Assessment), and the American Society for Testing and Materials (ASTM) designations: E 1527 (Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessments Process) and E 1528 (Standard Practice for Environmental Site Assessments: Transaction Screen Process).

2.0 RESULTS AND DISCUSSION

2.1 Site Location and Description

The Site is located at the eastern end of Point Douglas Avenue, on the south side of the CPR main line in the Point Douglas area of Winnipeg Manitoba, as shown in Figure 1. The Site is irregularly shaped, occupying a thin panhandle east of Higgins Avenue along the south side of the CPR main line and the eastern half of the south side of a peninsula from the beginning of an inside bend to the midpoint of the bend along the Red River, as shown in Figure 2.

The property is approximately 5.2 ha (12.9 acres) with multiple buildings and equipment located throughout the property. The property currently accommodates an inoperative production facility which formerly produced bulk paper for on-site paper re-cycling and for the manufacturing into what is commonly known as roofing tar paper, roll roofing and other general paper uses. The buildings have also been used to store soap and soap by-products. Some of the manufacturing equipment has been removed, while spare and obsolete machinery is located in several areas of the property. In addition, sections in the buildings and/or on the lands around the buildings contain stacks of cylinders, large containers of industrial soap extrusions, pallets of roll paper products, cardboard, recycled paper, inoperative machinery, assembly line conveyors and links, miscellaneous piping, various amounts of metal debris and other forms of debris and equipment.

2.2 Site Topography and Drainage

The ground surface is predominantly level, with a slight grade towards the river. Surface runoff from the Site is directed towards the river. A private storm drainage system is located on the Site and drains to the river.

2.3 Site Geology and Groundwater

Local geological maps and water well logs show that the subsurface stratigraphy in this area of Winnipeg normally consists of fill soils (such as topsoil and granular), underlain by alluvial and lacustrine silt and clay deposits, ranging in depth from 15 to 21 m. A deposit of silty till, varying in thickness from 6 to 12 m is encountered between the lacustrine deposits and the underlying bedrock. Bedrock in this area of Winnipeg typically consists of dolomitic limestone beds of various thicknesses from the Selkirk Member of the Red River Formation. Bedrock formation was from the Paleozoic Era during the Ordovician Period.

Near-surface groundwater elevations (perched groundwater) can exist at the Site and throughout the area, and will vary on a seasonal basis and from Site to Site. Perched groundwater elevations are predominantly controlled by Site conditions, such as the type and thickness of fill soils. The near static groundwater elevation will typically vary with the river elevations, but mainly be located approximately 5 m below existing grade. The groundwater elevation is controlled by the underlying bedrock aquifer. There are no aquifers above the bedrock. The potential for impact to the aquifer was considered unlikely due to the thickness of the highly plastic clay deposits and Site usage.

2.4 Historical Site and Surrounding Land Uses

The history of the Site and surrounding land use were determined from several documented sources of information, and are outlined in the bibliography/reference list.

Site

The historical search, including a land titles search, revealed that the Site had begun to develop significantly in the early 1940s into a lumber, paper and roofing mill, owned by Building Products of Canada Ltd. A 1950 aerial photograph, shown in Appendix A, shows the presence of approximately 50% of the present day buildings. In 1985 the Site was purchased by 66702 Manitoba Ltd. and then by Gateway Industries Ltd., the present owner, the same year. However, the Site was occupied by a tenant, Domtar Construction Materials Ltd., from 1987 to 1990 when Gateway Industries Ltd. occupied the Site.

Located on Site were 11 buildings, defined in Figure 3 as buildings A through K. Aerial Photographs of the Site and surrounding land in 1927, 1950, 1960, 1972, 1988 and 1998 are shown in Appendix A. Photographs taken at the time of the Site visits are shown in Appendix B.

Building A

Building A is an unheated steel frame concrete block building with a concrete floor, fluorescent overhead light fixtures and a metal roof, built between 1950 and 1960. The 1400 m² building is used as a warehouse, presently storing paper rolls and soap products. Fluorescent lights with ballasts are used for overhead lighting as shown in Photograph 1.

Building B

Building B is also an unheated steel frame concrete block building with a concrete floor and a metal roof, built between 1950 and 1960. The 1300 m² building is used as a warehouse, presently storing paper rolls, fibreglass rolls, surplus metal equipment and soap products. Fluorescent lights with ballasts are used for overhead lighting as shown in Photograph 2.

Building C

Building C, referred to as the Winnipeg Paper Building, is a steel frame and steel siding building with a concrete floor and a metal roof, built in 1987. The building has ceiling mounted heaters and fluorescent lighting. The 1100 m² building is predominantly used to bail recycled paper, as shown in Photograph 3. Several oil drums, containing general engine and hydraulic oils, were stored in the building, seen in Photograph 4. There are no drains in the floor. Surplus metal equipment, including several tractors are also stored in the building. Unused fluorescent lights were noted to be stored, however the frame portion of the lights containing the ballasts, were not present. A dry transformer is located in the southwest corner of the building with the electrical panel along with a thermostat that may contain trace amounts of mercury.

Building D

Building D, the main office on the Site, is a steel frame two-storey brick structure with drywall panelling and fibreglass insulation, approximately 475 m² in size and was originally constructed between 1960 and 1970. Portions of the building were rebuilt after a fire, replacing the original timber construction with steel. The floor coverings are a combination of vinyl and carpet, while ceiling tiles which may contain asbestos are located on the main floor, with drywall on the second floor, as seen in Photograph 5. Fluorescent light fixtures and a sprinkler system are located throughout the building. Washrooms are located on both floors of the building.

Building E

Building E, the largest building on the Site at approximately 4200 m² was built in the 1940s. The building has a steel frame with timber posts, a concrete floor and brick walls. Portions of the roof are wood while newer portions are metal. The majority of the walls are covered with drywall and fluorescent lighting is used throughout. The main electrical panel is along the east wall as well as several natural gas unit heaters, as shown in Photographs 6 and 7. Overhead pipes throughout the building are wrapped with fibreglass insulation, which does not contain asbestos.

The northwest corner of the building, adjacent to the main office (Building D), contains a furnace, locker rooms, a small lunchroom and records storage. Floor tiles cover portions of the concrete floor in this area. There are indications that a fire may have taken place near the records storage area.

Immediately south of this area of Building E is the cafeteria which is approximately 100 m² and has floor and ceiling tiles that may contain asbestos as shown in Photograph 8. The cafeteria contains a disconnected unit heater and is currently used for the storage of paper.

The north end of Building E is used to store fibreglass insulation and other general storage while the northeast corner of the building contains a separate room housing an air exchanger. Immediately south of the air exchanger are two tanks containing preheating oil. The concrete floor in this section of the building is caked in oil. Two dry transformers are located along the north wall with the electrical control panel.

The roofing felt paper operation is located along the east side of the building as seen in Photograph 9. Much of this area is covered in tar and tar paper. There is a partial basement in the southeastern portion of the building beneath the roofing felt paper operation. A burst pipe spilled tar on approximately two thirds of the concrete floor as shown in Photograph 10. A boiler is located in the northeast corner of the basement.

The south end of the building is used as general storage and has an office located in the southwest corner. This portion of the building has a metal roof. Two partial transformer units have been stored in this area for approximately one-year, as shown in Photograph 11.

Building F

Building F is a steel frame concrete block building with a concrete floor and a metal roof built in the 1940s. The 800 m² building is heated with a natural gas furnace and has fluorescent lights. One dry transformer is located with the electrical panel, and another Class H dry transformer is located beside a furnace. The building is used to roll and cut paper. The building also houses printing machines used for printing soap labels using water-based ink.

Building G

Building G is a 750 m² steel frame post building with a concrete floor and a metal roof with fluorescent lighting, built between 1950 and 1960. The building is used for shipping and receiving as well as general paper storage.

Building H

Building H is open on two sides, with a steel frame and a metal roof. The western portion of the building was constructed between 1950 and 1960, while the eastern portion appears to have been constructed between 1960 and 1972. A causeway runs through the structure in the north/south direction, seen in Photograph 12. Tar is stored in cardboard drums on the east side of the building.

Building I

Building I, the boiler house, is approximately 230 m². The building has a brick exterior and a metal roof and was constructed in the 1940s. A series of catwalks provide access to the natural gas powered boiler, which is no longer used by the plant, shown in Photograph 13. Fibreglass insulation covers the pipes. Nearly a dozen containers of an industrial waste phosphate treatment solution, seen in Photograph 14, are stored inside the building and were used as a boiler treatment and water softener.

Building J

Building J is a 2200 m² timber and steel structure with a metal roof and a concrete floor, constructed in the 1940s. Near the northwest corner of the building is a gas boiler room which has replaced the heating system in Building I, as shown in Photograph 15. The insulation surrounding the boilers is fibreglass.

A stores room is located in the southwest corner of the building and contains general supplies such as bearings, bolts and belts. North of the stores room is an electrical supply room which was noted to store approximately a dozen older ballasts which may contain PCBs. North of the electrical supply room is the drafting room which has floor and ceiling tiles which may contain asbestos. Among general storage along the west wall are several pallets of paint cans. Five transformers, which were purchased from Perth Amboy in New Jersey, USA, are also stored in this area, three of which are shown in Photograph 16. The electrical panel is located at the north end of the building and contains one dry transformer.

Building K

Building K is a 3000 m² timber and steel structure with a newer metal roof and a concrete floor, constructed in the 1940s. The walls are concrete block, covered with drywall in sections, however there is no insulation. The building houses a paper making operation, turning waste paper into pulp which is refined, screened and then pressed into paper, as seen in Photograph 17. Floor drains along the operation collect waste spillage for recycling. A partial basement beneath the operation contains a water recycling zone. Much of the equipment is covered in pulp paper. An electrical panel is located near the operation and contains a dry transformer as shown in Photograph 18.

A partial second floor in Building K contains two offices, screen cleaners and dry chemical fire extinguishers. An electrical room in the northwest corner of the second floor houses one dry transformer and one transformer with 9 banks containing PCBs as seen in Photograph 19.

Caustic soda tanks are located at the northwest corner of the building as shown in Photograph 20. The northeast corner of the building is used for paper storage. An electrical room is located at the north end of the building. Oil and grease cans are stored in the southeast corner of the building. The room is vented and has no floor drains.

A laboratory, a machine shop and a control room are located at the south end of the building. A nuclear densometer containing Radon (UN 2982), used for testing paper densities, is located in the laboratory

as shown in Photograph 21. The laboratory also contains a water bath, ovens, a fume hood and flammable chemicals stored in 5 gallon cans. The floor is covered with tiles however the ceiling is not, as seen in Photograph 22. Fluorescent lights are overhead and a thermostat that may contain trace amounts of mercury is located on the south wall. The machine shop, generally used for maintenance welding, contains a fume hood and a local floor drain. An equipment control room, also located at the south end of the building, has floor and ceiling tiles.

Site Exterior

Most of the Site's exterior is covered in approximately 70 to 80% concrete or asphalt. An access road traverses the perimeter of the Site, along with a road linking the north and south sides of the property between Buildings E and J. There are two paved parking areas, one on the north side of Point Douglas Avenue and one on the south side of the main office, Building D.

A vehicle weigh scale, presently in operation, is located along the west property line adjacent Building F, shown in Photograph 23. An older, nonoperational scale, is located at the southeast corner of Building E, seen in Photograph 24.

The CPR mainline borders the Site along the north side, with three CPR spur lines propagating midway into the property from the west near the Point Douglas Avenue right-of-way, as shown in Photographs 25 and 26.

Surplus metal equipment, including semi trailers and older vehicles are stockpiled throughout the property, most notably along the north property line, shown in Photograph 27, along the south property line near the riverbank seen in Photograph 28, and on the south side of Buildings G, E, H, J and K as shown in Photograph 29. Recycled paper and wood pallets are stockpiled throughout the eastern end of the property, as noted in Photographs 30 and 31. A stockpile of empty battery casings, which appear to never have been used, were noted near the northeast corner of Building A, seen in Photograph 32.

Three transformers were stored amongst the surplus metal equipment and paper storage east of Building C. Nine transformers were located on a concrete pad recently enclosed in a metal shed, between Buildings B and K, owned by Manitoba Hydro (formerly Winnipeg Hydro) as shown in Photograph 41.

A series of local storm drains collect surface runoff, which is directed towards the river. Three fire hydrants are located at various points throughout the Site, shown in Figure 3 as FH-1 through FH-3. A pump house is located midway along the south riverbank, south of Building K. The pump house is used to pump river water for the mill operation. The water is discharged either into the City of Winnipeg sewer or into the Red River under a permit issued by the City of Winnipeg.

A total of six (6) monitoring wells, specifically 25 mm PVC stand pipes, were located on the Site as shown in Figure 3 (MW-1 to MW-6). Two were installed by KGS Group (MW-5 and MW-6) in January, 2003 as part of a sewer replacement investigation for the City of Winnipeg. The remaining four (4) wells, two of which could not be found (MW-2 and MW-3), were installed by Paddock Drilling Ltd. for the previous owner of the Site, Building Products of Canada Ltd., on an unknown date. It was unknown at the time of writing this report what consulting firm was involved with the installation of these monitoring wells.

In May 2004 the City of Winnipeg Water and Waste Department installed two 600 mm diameter high density polyethylene (HDPE) force sewer mains in an easement which follows the eastern extension of the Point Douglas Avenue right-of-way. An existing 600 mm cast iron force sewer main was

abandoned. Manholes are on Site providing access to these lines.

A visual review of the riverbank along the Site noted that asphaltic shingles have been dumped along the riverbank and overtime have conglomerated becoming embedded in the riverbank, as seen in Photograph 33. The shingles were reported to have been placed along the bank when Building Products of Canada Ltd. occupied the Site.

Various above and below grade fuel storage tanks are located throughout the Site as detailed in Sections 2.5 and 2.7.

Surrounding Land Use

The Canadian Pacific Railway (CPR) line bordering the Site immediately to the north was developed in the late 19th century with general storage facilities being constructed after 1927. The property immediately north of the CPR line has never been developed. It has been used for pulpwood storage, as a snow disposal Site by the City of Winnipeg and presently as a storage area for empty tanks and metal items for Gateway Industries Ltd. Areas to the west of the Site are residential housing built in the early 20th century as shown in Photograph 34. The construction dates of the houses varied, but were all pre 1950. The topography of the adjacent lands has not changed significantly since development, excluding the demolishing or alterations of a few buildings.

2.5 Government Records Review

The Site is registered on Manitoba Conservation's Contaminated Sites list, under file number 0630. The file indicated that 1 - 4545 L underground gasoline storage tank was removed in 1993 and soil testing revealed that hydrocarbon contamination exists. Additional investigation was recommended to delineate the contamination area. Three other underground storage tanks were to be removed, 2 - 29550 and 1 - 2270 L tanks. However, the 2270 L tank could not be located, and the remaining two tanks were surrounded in concrete, underlying the foundation of Building I and consequently not removed. The file also contains a Site inspection report from September of 1995 conducted by Manitoba Environment (Conservation) which reviews solid waste generation, plant processes, fuels used and air emissions. Also present were the material safety data sheets for the thermal oils used in the plant. Two Site plans are included, one indicating the location of a fuel oil tank and another indicating the locations of four monitoring wells.

An environmental assessment and subsurface investigation, by MacPLAN Environmental Services Ltd., was written in February 1993. Twelve (12) test holes to a maximum depth of 7.6 m were drilled at locations throughout the Site. Fill materials, such as granular roofing and shingling products, were encountered in the majority of the test holes at depths from 0 to 2 m. The subsurface investigation and analysis of the test hole samples showed the presence of metals, BTEX and polycyclic aromatic hydrocarbons (PAHs) on the property. The report recommended further inspection, sampling and analysis of underground storage tank locations, the asphalt tank area, the river bank and other areas not accessible by the drill rig.

A file search was conducted by Manitoba Conservation and revealed that the department has no record of any outstanding work orders, complaints, violations, licences or permits with respect to the Site. A Clean Environment Commission Order No. 361, also referred to as Environmental Act Licence No. 361, was issued in 1974. The last inspection of the Site was in 1995 with compliance of the licence being demonstrated at that time. The last complaint on file is April 19, 1984. Details of the complaint were unavailable. Presently there are no outstanding licencing issues and the Site is in compliance with the current licence. The file did reveal that in 1987, improper mixing of caustic soda in a hot tank resulted in a rise in tank temperature. The City of Winnipeg Fire Department successfully cooled the tank. No

leaks were reported and the tank was to be removed.

The tanks on the Site are recorded with Manitoba Conservation under petroleum storage site details file number 12034, and are listed as active. The file identifies 2 - 29550 L underground heating oil tanks installed in 1952 and removed in 1993, 1 - 2270 L underground gasoline tank installed in 1958 and removed in 1990, 1 - 4545 L underground gasoline tank installed in 1962 and removed in 1993 and 1 - 59100 L above ground gasoline tank installed in 1967 which has not been removed. Site inspections were performed in 1993, 1996 and 2002. The petroleum storage site details file appears to be incorrect as Manitoba Conservation file number 0630, as mentioned above, revealed that the 2 - 29550 L tanks were not removed in 1993.

A City of Winnipeg Waterway Permit Search revealed that the subject Site is regulated under Waterway By-Law No. 5888/92 because it is within 350 feet of the Red River. As such, any proposed construction within the regulated area would require securing a Waterway Permit. A total of fifteen (15) permits were issued on the Site including:

- Building of two (2) concrete cradles and one (1) 4500 L (1000 gallon) propane tank in 1952.
- Building a 670 m² one storey addition to an insulated siding building in 1954.
- Storage of paper mill raw stocks, cordwood, baled rags and paper not closer than 7.6 m from the top of the riverbank in 1958. This permit expired in 1959.
- Construction of a 1900 m² reinforced concrete slab for raw and finished paper storage in 1961.
- Place topsoil along the west riverbank along the south property line for landscaping and beautifying this section and to stockpile raw and finished paper products on a reinforced concrete slab in 1961.
- Construct a 194 m² one-storey concrete block addition to the paper mill machine room under permit number 905-62 in 1962.
- To construct a manhole and replace an abandoned drain with a 200 mm diameter concrete pipe yard drain to the Red River under permit number 801-64 in 1964.
- Build a 56 m² reinforced concrete scale pit founded on reinforced concrete friction piles and the installation of a 55 tonne capacity ground level truck weigh scale under permit number 72-64 in 1964.
- Replace an existing 100 mm diameter cast iron water pipe line on the ground surface with a 150 mm diameter cast iron underground water line from and existing pump house to the Red River under permit 80-65 in 1965.
- Construct a 6 m² frame scale house and a 56 m² weigh scale on concrete piles under permit number 4-69 in 1969.
- Demolish and reconstruct a 39 m² frame addition on the same site under permit number 205-75 in 1975.
- Construct a one-storey 108 m² addition to an existing manufacturing building, to regrade the existing riverbank to a 1 vertical to 4 horizontal slope and rip-rap the toe of the bank per a stability report by I. D. Engineering Co. under permit number 51-80 in 1980.
- Construct a 1160 m² one-storey pre-engineered steel building under permit number 172-87 in 1987.
- Construct a 340 m² one-storey addition to an existing industrial building under permit number 99-94 in 1994.
- Install a 180,000 L asphalt storage tank on a reinforced concrete slab and a concrete containment berm surrounding the proposed tank under permit number 60-99 in 1999.

2.6 Site Reconnaissance and Interviews

ENG-TECH visited the Site on October 21, 22 and November 1, 2004 and met with Sheldon Blank, owner of Gateway Industries Ltd, Merv Chochinov, Vice-President of Gateway Industries Ltd, and Gary Barthelette, employee of Gateway Industries Ltd. The Site and surrounding areas were inspected, photographed and pertinent potential environmental concerns and issues noted at the time of the Site visit. An overview of the Site along with the adjacent land uses has previously been outlined. An overview of specific potential environmental concerns and issues addressed are outlined in Section 2.7. Photographs 1 to 46 taken at the time of the Site visit are shown in Appendix B. Several interviews and discussions were conducted with Mr. Sheldon Blank regarding potential environmental concerns, at the time of the Site visits. Mr. Blank was not aware of any activities which could have a negative impact to the Site or users of the Site which have not already been disclosed.

In 1995, Environment Canada charged Gateway Industries Ltd. with violations of the Fisheries Act. In 2004, the Department of Justice stayed the proceedings. However, several legal matters remain unresolved and privileged in ongoing civil litigation.

2.7 Potential Environmental Issues and Concerns

Air Emissions

When the plant is in operation, atmospheric odour/particulate emissions from the saturator unit, controlled by the HEAF system are generated. Odour emissions may be released during transfer of asphalt from rail cars. The paper mill produces particulate from the air blowing of wood chips to the stockpile area, odour emissions from the roof vents over the dryer line. Baled shredded waste paper stockpiled on Site could be wind entrained off the property.

Asbestos Containing Material (ACM)

Acoustic ceiling tiles located in portions of Buildings D, E and J could contain trace amounts of asbestos depending on the year they were manufactured. Likewise, floor tiles located in portions of Buildings E, J and K could contain trace amounts of asbestos depending on the year they were manufactured. Insulation on boilers and piping throughout all of the buildings was noted to be fibreglass, a non-asbestos containing material.

Two (2) stills and four (4) kettles are located between Buildings E and J. The insulation on these tanks may contain asbestos, as seen on the right side in Photograph 44.

Chemical Storage or Use

A pool of reddish brown water with what appears to be oil was noted outside along the east side of Building E. The water was contained within a shallow concrete berm. Several blue barrels were adjacent to the area as seen in Photograph 35. Two barrels, shown in Photographs 36 and 37, are located southeast of Building K. One barrel was labelled as containing caustic soda and is presently filled with water. The second barrel had no label but contained a reddish brown liquid with no noticeable odour. Caustic soda tanks are located in Building K used in the paper making operation.

Approximately a dozen containers of industrial waste phosphate treatment solution are stored in Building I and are used for a boiler treatment and as a water conditioner. Soap and soap by-products are stored at various locations around the Site, the majority of which is in Buildings A and B. Water-based inks used for printing soap labels are stored in Building F. The floor in the storage area is concrete. The potential environmental concerns of the above mentioned chemicals is low and required.

no additional investigation.

Freon and Halon

Freon and Halon products were not stored or used at the Site with the exception of several window unit air conditioners.

Hazardous Materials Storage and Waste

A nuclear densometer containing radon is located in the laboratory in Building K and is used for testing paper densities as shown in Photograph 21.

Thermal oil is used in the plant operation as a heat source in cool/cold weather and to dry saturated felt.

Thermostats located in many of the Buildings may contain trace amounts of mercury.

Liquid Waste Products

The sanitary liquid waste and excess overflow waste water from the paper manufacturing operation generated at the Site are discharged into the City of Winnipeg sanitary sewers and treated at one of the City's treatment plants. No other liquid waste which would be of concern was reported to have been generated at the Site.

Polychlorinated Biphenyl (PCBs)

The ballasts in the fluorescent light fixtures in all of the buildings may contain PCBs if they were manufactured before 1979. The electrical supply room in Building J stores approximately a dozen older ballasts that may contain PCBs.

Several transformers that may contain PCBs are located throughout the Site. One transformer in Building K had nine (9) banks labelled to contain PCBs, as shown in Photograph 19. No leakage was noted beneath the transformer. Two partial transformers are stored in Building E, reportedly brought to the Site without their outer casings as shown in Photograph 11. The five transformers stored in Building J, three of which are seen in Photograph 16, were purchased from Perth Amboy in New Jersey, USA, by Gateway Industries Ltd. and as a condition of the sale were to be PCB free. Documentation confirming this is unavailable. Three (3) transformers are located east of Building C among surplus metal and paper storage and may contain PCBs.

Pole mounted transformers were noted at several locations on the exterior of the Site. A pole at the northwest corner of Building F supports three transformers. A white sticker is present on the transformers indicating that they are PCB free, as seen in Photograph 38. A pole at the southwest corner of Building A, north of the rail spurs, supports three transformers, as shown in Photograph 39. Yellow stickers were noted on the transformers indicating that they contain 0 to 44 ppm PCBs. No leakage or staining was noted beneath the pole. A single pole mounted transformer, located approximately 30 m east of the previously mentioned utility pole, is also marked with a yellow sticker again indicating that it contains 0 to 44 ppm PCBs. No leakage or staining was noted beneath the pole as seen in Photograph 40. Three pole mounted transformers are located in the Point Douglas Avenue right of way on the south side of the Site's narrow panhandle. All of the transformers appeared to be newer, with one transformer having a white sticker, indicating it to be PCB free. No leakage or staining was noted beneath the poles.

Nine transformers were located on a concrete pad enclosed in a metal shed, between Buildings B and K, owned by Manitoba Hydro (formerly Winnipeg Hydro) as shown in Photograph 41. In 2002, ENG-TECH was retained by Gateway Industries Ltd. to conduct PCB sampling and testing at the Site. The purpose was to determine whether traces of PCBs were present on the transformer concrete pad and in the adjacent soils. Four (4) swab samples off the concrete pad and four (4) soil samples adjacent to the pad were collected. The testing revealed that all of the samples were below current provincial guidelines for commercial/industrial sites, however, all four (4) soil samples were above the guidelines for residential/parkland sites. ENG-TECH recommended further sampling and testing at the Site to show the extent of PCB impact with depth and location. Since that time, the transformers have been enclosed in a metal siding building.

Dry transformers are located in Buildings C, E, F, J with the electrical panels. Dry transformers do not contain PCBs.

Potential Environmental Concerns from Adjacent Neighbouring Sites

The only potential environmental concern noted from adjacent properties would be the CPR tracks bordering the north property line of the Site. No records of known spills or potential environmental concerns were identified at the time of writing this report.

Nuisance Odours

No unusual odours were detected at the Site during the Site visit.

Storage Tanks and Drums

In 1993 an attempt was made to remove 4 underground tanks: 2 - 29550 L bunker-C fuel tanks, 1 - 2270 L gas tank, and 1 - 4545 gas tank, reportedly installed in 1952, 1958 and 1962, respectively. The 4545 L gas tank was successfully removed along with the associated piping and venting. The 2 - 23 500 L bunker fuel tanks, as shown in Photograph 42, were located partially underground near the edge of the Building I foundation, encased in concrete on all sides and consequently were not removed.

The 2270 L gas tank could not be located, and was therefore not removed. The 1964 Fire Insurance Maps (FIM) show an underground tank southeast of Building K, near a storage shed. However much of the area is presently covered in concrete and the tank identified on the FIM was not found. As noted in Section 2.5, the Manitoba Conservation petroleum storage file number 12034 lists a 2270 L underground tank as being removed in 1990.

Two (2) steel tanks, which were reportedly never used, are located at the southeast corner of Building E, as seen in Photograph 43. These tanks are not listed with Manitoba Conservation.

Five (5) asphalt tanks are located on the west side of Building J as shown in Photograph 44. Four of the tanks were installed prior to 1950, while the fifth tank was installed between 1950 and 1960. Overhead pipes supply the asphalt to the roofing mill operation in Building E. An additional asphalt tank is located immediately north of Building I was installed prior to 1950 as seen in Photograph 45.

A 190,000 L above ground oil storage tank was formerly located on the Site east of the southeast corner of Building E. The tank appears to have been installed prior to 1950 and removed by 1972.

A light thermal oil tank with a capacity of 30,000 litres is located between the spur lines, north of Building I, seen in Photograph 45. The tank was installed between 1972 and 1988.

No underground tanks are presently reported to be on the Site, although the tank shown on the 1964 FIM has never been reported to have been found or removed.

A propane tank is located on the south side of Building J. Evidence of a fire near the tank is present as shown in Photograph 46.

Waste Disposal

Current solid waste generated from the daily operation of the plant when in operation is estimated at 3 to 5 tons per day. The waste is stockpiled at the east end of the fenced property. The solid waste can be hauled either to the Brady landfill or the Town of Selkirk landfill, based on a review of Manitoba Conservation records. The waste was characterized by Manitoba Hazardous Waste Corp. in 1995 and deemed non-hazardous, fit for disposal at any approved landfill.

Former waste disposal practices are in part unknown, however asphaltic shingles have been dumped along the riverbank and overtime have conglomerated becoming embedded in the riverbank as shown in Photograph 33. Leachate testing for metals and total hydrocarbons was conducted by MacPLAN in 1993 on three samples revealing low concentrations of arsenic, barium and boron. No hydrocarbons were detected in the samples.

Waste Disposal Sites

The former Elmwood Landfill Site is located within 1 km east of the Site on the east of the Red River. The potential of impact to the subject Site is considered unlikely.

Other Potential Environmental Issues and Concerns

Two-thirds of the basement of the roofing felt paper operation in Building E is covered in tar from a burst pipe. This may create hazardous working conditions or be a concern if the building is demolished.

3.0 CONCLUSIONS AND RECOMMENDATIONS

Potential environmental concerns and issues, along with ENG-TECH's conclusions and recommendations are outlined below:

Impact from Adjacent Properties

- The CPR mainline located immediately north of the Site and spur lines on the Site are a potential environmental concern. The surrounding soil may have been contaminated with hydrocarbons, which can only be determined by soil sampling and testing. As such, it is recommended that a Phase II ESA be conducted at the Site, to test for hydrocarbons, specifically polycyclic aromatic hydrocarbons (PAHs).

PCBs

- The ballasts in the fluorescent light fixtures in the buildings and the ballasts stored in the electrical supply room in Building J may contain PCBs if they were manufactured before 1979. As such, the number on each ballast should be checked during replacement or renovations to determine whether it contains PCBs. If it contains PCBs, it should be disposed of in accordance with the Federal Government's regulations, administered by Environment Canada,

regarding disposal of PCB containing material or hazardous waste for commercial or industrial sites.

- The two partial transformers stored in Building E were reportedly brought to the Site without their outer casings. Since the outer casings contain any oils associated with the transformers, it can be assumed that these partial transformers are PCB free. Consequently no further action is required.
- The five transformers stored in Building J were purchased from the United States, and as a condition of the sale were to be PCB free. Documentation confirming this is unavailable. Consequently, oil from the transformers should be tested for PCB content in a Phase II ESA.
- The three transformers stored outside, east of Building C should be tested for PCB content in a Phase II ESA.
- One transformer is located in Building K with nine (9) banks labelled as containing PCBs. No leakage was noted by the transformer, therefore, no immediate action is required at this time. However if Building K were to be decommissioned, the transformer should be disposed of in accordance with the Federal Government's regulations, administered by Environment Canada, regarding disposal of PCB containing material or hazardous waste for commercial or industrial properties.
- Nine transformers are located on a concrete pad, between Buildings B and K, enclosed in a metal shed. In 2002, ENG-TECH was retained by Gateway Industries Ltd. to conduct PCB sampling and testing at the Site. The testing revealed that all of the samples were below current CCME guidelines for commercial/industrial sites, however, all four (4) soil samples were above the guidelines for residential/parkland sites. As such, it is recommended that a Phase II ESA be conducted at the Site, to test for PCBs with depth in this area.
- It was not considered a significant concern that low to trace quantities of PCBs may be located in the transformers mounted on utility poles at the Site. No signs of leakage were noticed from the transformers at the time of the Site visit. As such, further assessment for PCBs in the transformers mounted on utility poles is not warranted.

Asbestos

- Several tanks located around the Site have insulation that may contain asbestos. Sampling and testing of the insulation should be conducted in a Phase II ESA to determine if any asbestos is present.
- The floor tiles located in several of the buildings may contain trace quantities of asbestos fibres. Sampling and testing should be conducted in a Phase II ESA to test for asbestos. Alternatively, samples of the tiles could be tested for asbestos fibres.
- The acoustic ceiling tiles located in several of the buildings may contain asbestos fibres. Ceiling tiles are considered a friable material, as such several of the tiles should be tested for asbestos fibres or removed from the Site in a manner similar to an ACM.

Petroleum Hydrocarbons

- Hydrocarbon contamination of the soil in the proximity of the 4545 L underground petroleum tank removed in 1993 is known to exist. A Phase II ESA is recommended to delineate the contaminated area.
- In 1993 a 2270 L underground gasoline tank could not be located, and was therefore not removed. The 1964 Fire Insurance Maps (FIM) show an underground tank southeast of Building K, near a storage shed, however the Manitoba Conservation file number 12034 lists the tank as being removed in 1990. Because of the uncertainty as to whether the tank has been removed, a Phase II ESA is recommended to drill and test the soil for hydrocarbons in and around the suspected location of the underground gasoline tank.
- 2 - 23 500 L Bunker-C fuel tanks are located partially below grade on the west side of Building I. A Phase II ESA should be conducted to drill and test the soil for hydrocarbons adjacent the tanks to determine if any soil contamination exists.
- A light thermal above-grade oil tank is located north of Building I, adjacent the rail spurs. A Phase II ESA should be conducted to investigate soil contamination around the tank.
- Five asphalt tanks are located between Buildings E and K. A Phase II ESA should be conducted to investigate soil contamination around the tank.
- A pool of reddish brown water with what appears to be oil was noted outside along the east side of Building E. A Phase II ESA should be conducted to test the observed liquid for hydrocarbons and drilling and soil sampling should be conducted in the area to determine if any soil contamination has occurred.
- An environmental assessment and subsurface investigation, by MacPLAN Environmental Services Ltd. in 1993, drilled 12 test holes to a maximum depth of 7.6 m at locations throughout the Site. The subsurface investigation and analysis of the test hole samples showed the presence of metals, BTEX and PAHs on the property. The report recommended further inspection, sampling and analysis of underground storage tank locations, the asphalt tank area, the river bank and other areas not accessible by the drill rig. As such, a Phase II ESA is recommended to confirm the analysis and to investigate areas missed in the assessment.
- The four monitoring wells at various locations throughout the Site, installed by Paddock Drilling Ltd. for the previous property owner, should be located, sampled and tested for hydrocarbons in a Phase II ESA.
- The two monitoring wells installed by KGS in 2003 were installed through the till layer to bedrock. These wells should be decommissioned if no further use is planned.

Metals

- Due to the stockpiling of surplus metal equipment throughout the Site, surface soils should be tested for metals concentrations in a Phase II ESA.

Leachate

- Leachate testing should be conducted in a Phase II ESA on the asphaltic shingles embedded in the riverbank to further assess if they pose an environmental risk.

Hazardous Materials

- A nuclear densometer is located in Building K. Proper licensing and documentation should be maintained and transporting of this equipment should be done in accordance with the Canadian Nuclear Safety Commission.
- Thermostats located in many of the Buildings may contain trace amounts of mercury. No immediate action is required, however if the buildings are to be decommissioned, the thermostats should be disposed of in accordance with the Federal Government's regulations, administered by Environment Canada, regarding disposal of hazardous waste for commercial or industrial properties.

Other Potential Environmental Issues and Concerns

- Two-thirds of the basement of the roofing felt paper operation in Building E is covered in tar from a burst pipe. This may create hazardous working conditions or be a concern if the building is demolished. Most of the excess tar has been removed off of the floor, however the walls and the floor still remain covered in a thin layer of tar.

4.0 CLOSURE

The conclusions and recommendations presented in this report were based on the scope of work outlined for the purpose of the investigation, and were prepared in accordance with accepted professional engineering/geo-science principles and practises. However, as with any environmental site assessment the intent is to identify and address, not eliminate, potential environmental concerns.

The observations made at the Site do not apply to areas which could not be observed. In addition, other materials or compounds not investigated or identified or beyond the scope of work could be present at the Site. If this occurs, ENG-TECH Consulting Limited must be notified to determine whether modification to any part of this report should be conducted. If you have any questions or concerns regarding the findings, conclusions or recommendations presented herein, please contact the undersigned.

Sincerely,
ENG-TECH Consulting Limited



Clark Hryhoruk, M.Sc., P.Eng.
President

CDH/



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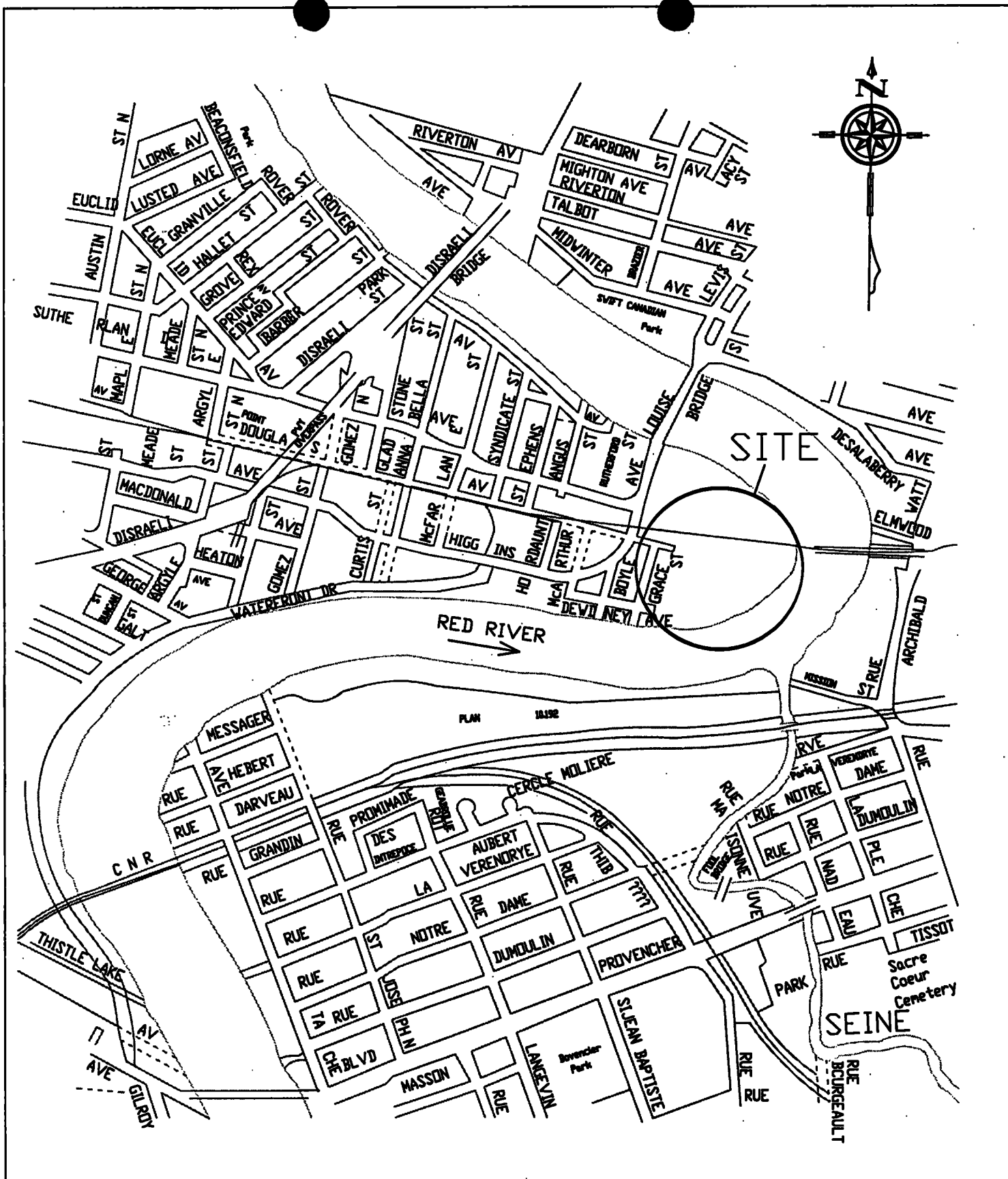
Winnipeg Land Titles Historical Search, 2004 to 1941.

LIST OF FIGURES

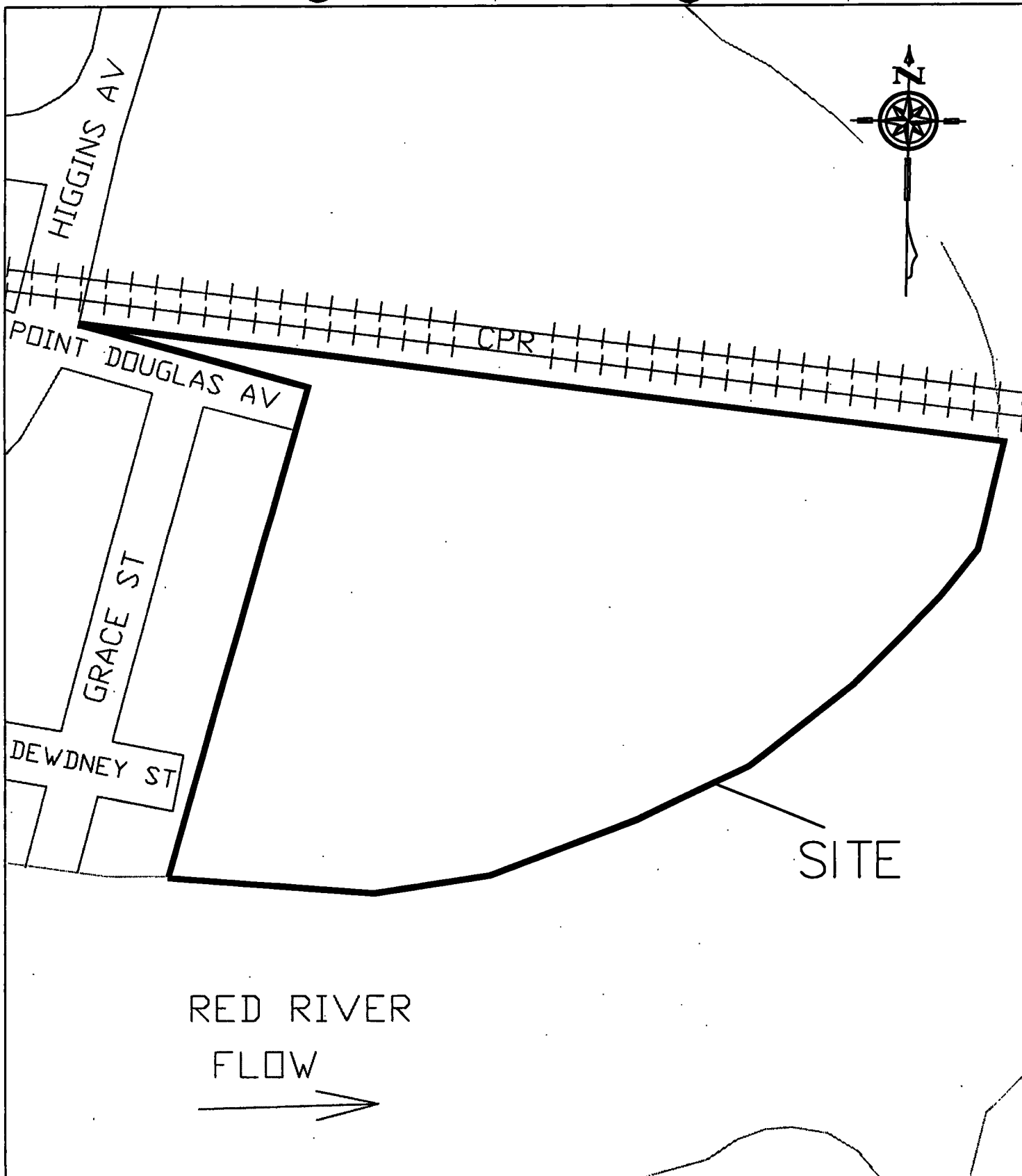
Site Location

Site Plan

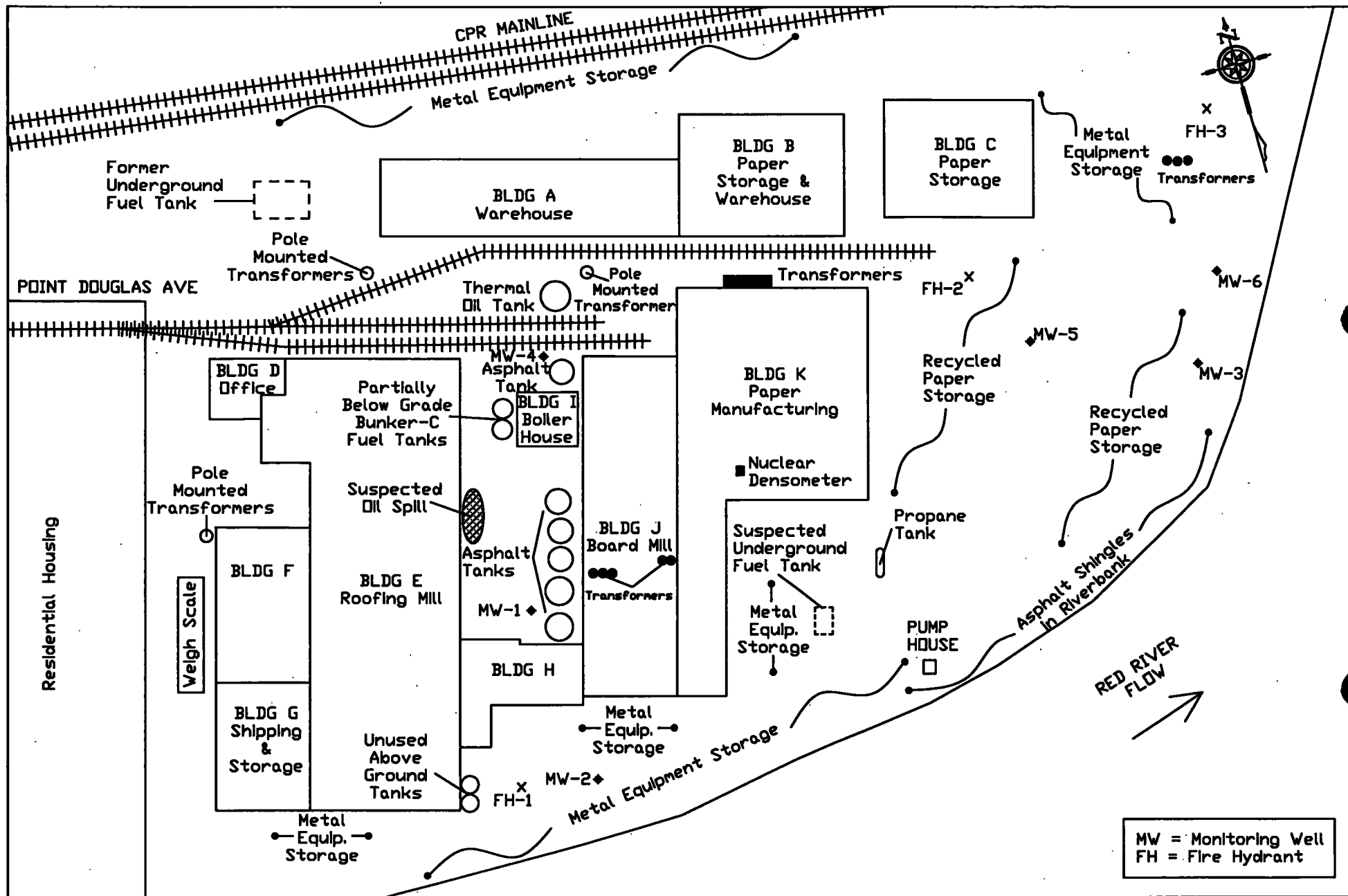
Building and Environmental Concern Locations



ENG-TECH CONSULTING LIMITED GEOTECHNICAL - ENVIRONMENTAL - MATERIALS TESTING			CLIENT: CITY OF WINNIPEG		SITE LOCATION PHASE I ESA #2 POINT DOUGLAS AVE (SOUTH) WINNIPEG, MB
DRAWN BY: N/A	SCALE: NTS	DATE: DEC 2004	FILE No: 04-217-02	FIGURE No: 1	



ENG-TECH CONSULTING LIMITED GEOTECHNICAL - ENVIRONMENTAL - MATERIALS TESTING			CLIENT: CITY OF WINNIPEG		SITE PLAN PHASE I ESA #2 POINT DOUGLAS AVE (SOUTH) WINNIPEG, MB
DRAWN BY: N/A	SCALE: NTS	DATE: DEC 2004	FILE No: 04-217-02	FIGURE No: 2	



ENG-TECH CONSULTING LIMITED

GEOTECHNICAL • ENVIRONMENTAL • MATERIALS TESTING

DRAWN BY:
JRD

SCALE:
NTS

DATE:
DECEMBER 2004

CLIENT: CITY OF WINNIPEG

FILE NO: 04-217-02

FIGURE NO.: 3

BUILDING & ENVIRONMENTAL
CONCERN LOCATIONS

PHASE I ESA

#2 POINT DOUGLAS AVE (SOUTH)
WINNIPEG, MB

LIST OF APPENDICES

Aerial Photographs (6)

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Legal Description

APPENDIX A

Aerial Photographs (6)

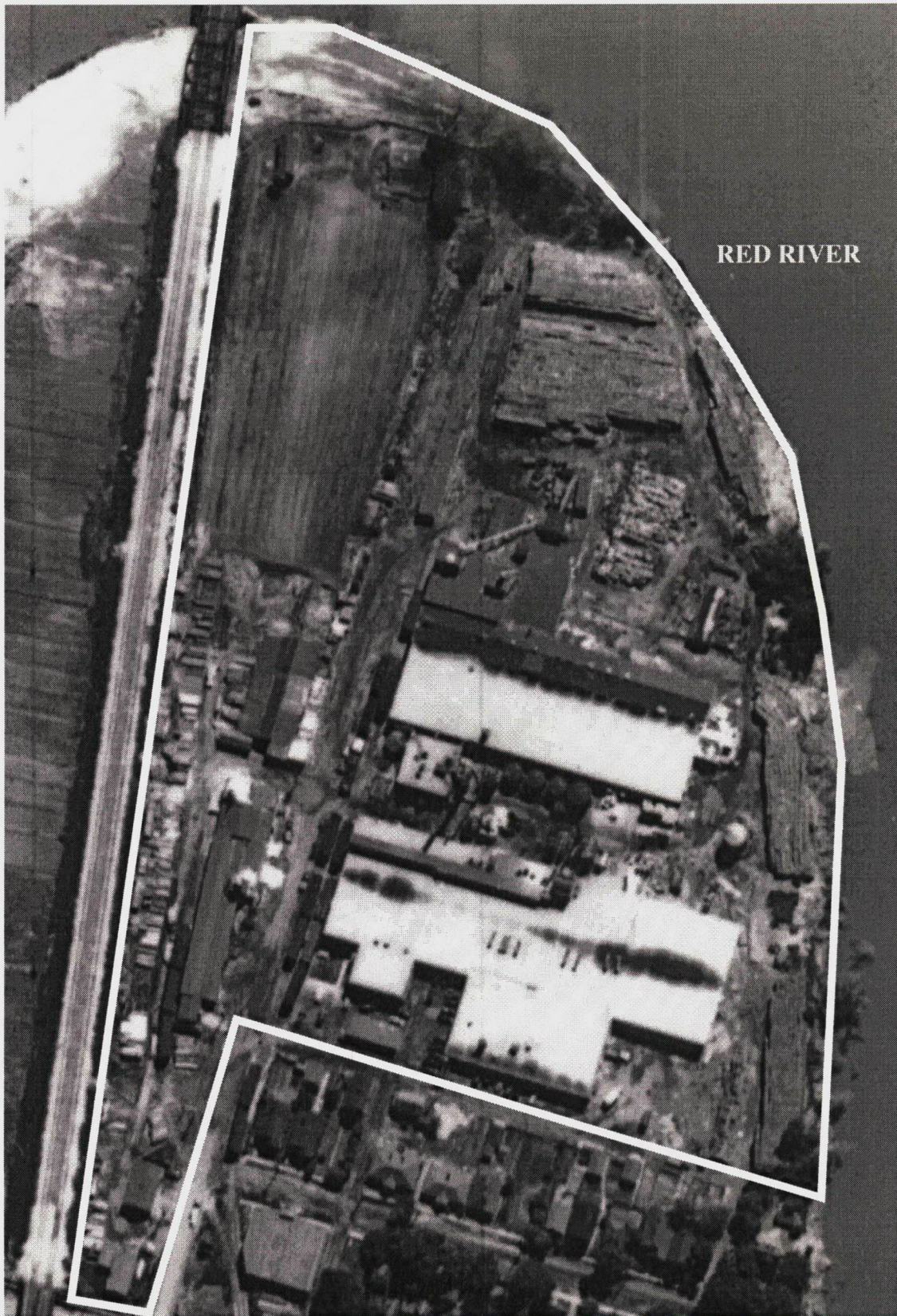


RED RIVER



AERIAL PHOTOGRAPH - 1927



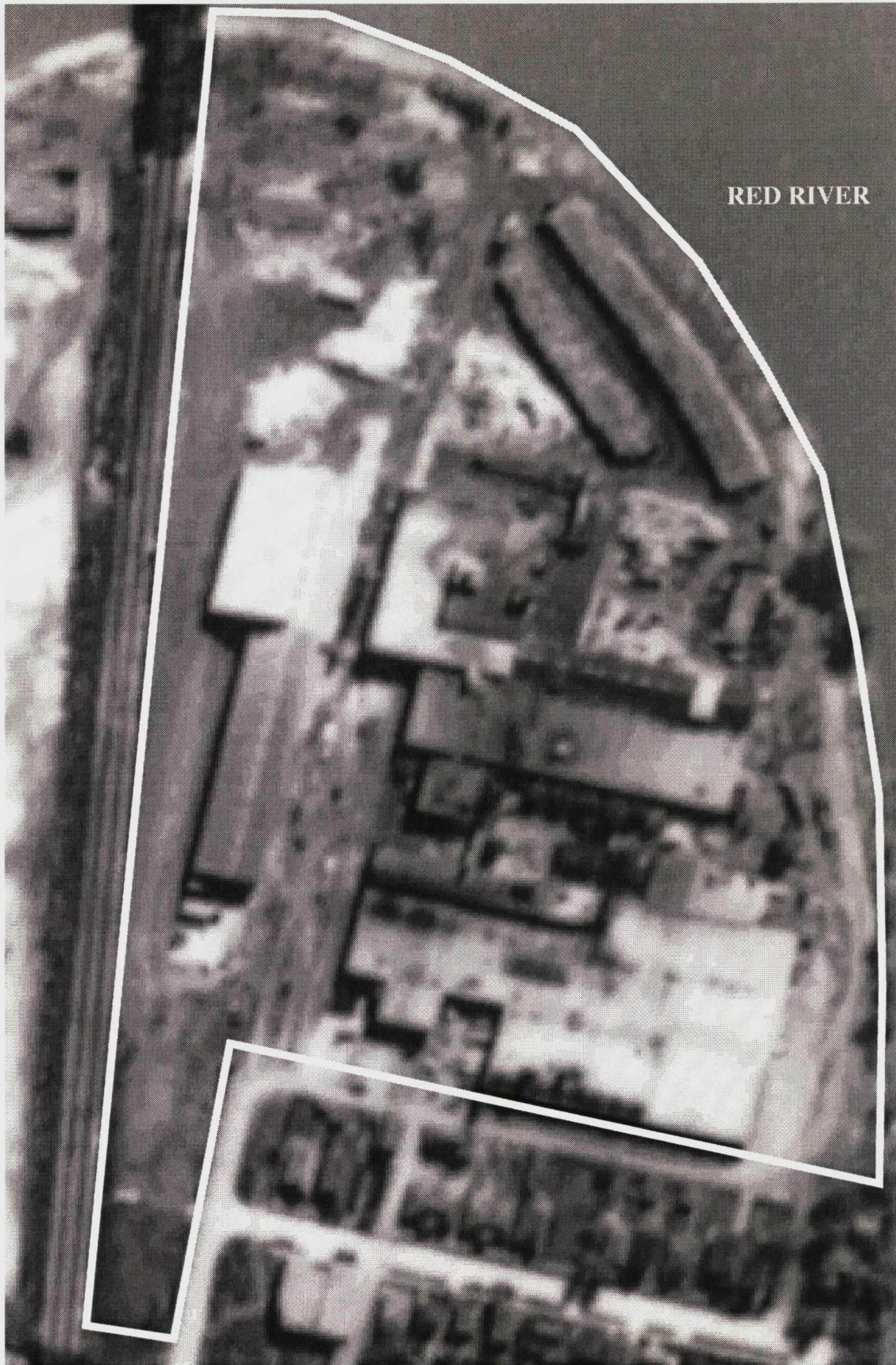


RED RIVER



AERIAL PHOTOGRAPH - 1950



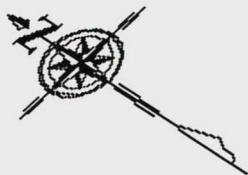
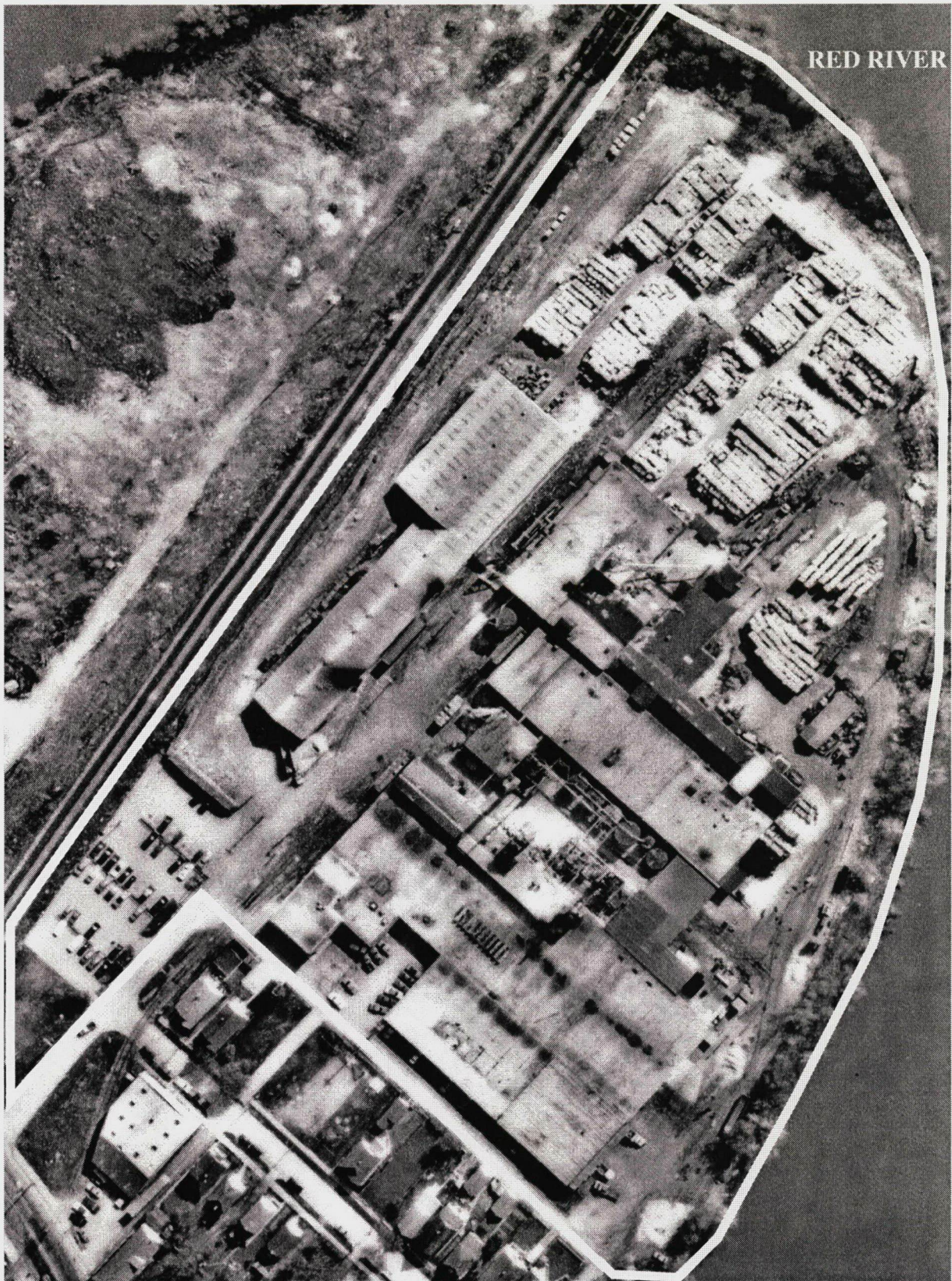


RED RIVER



AERIAL PHOTOGRAPH - 1960





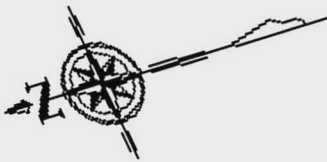
AERIAL PHOTOGRAPH - 1972

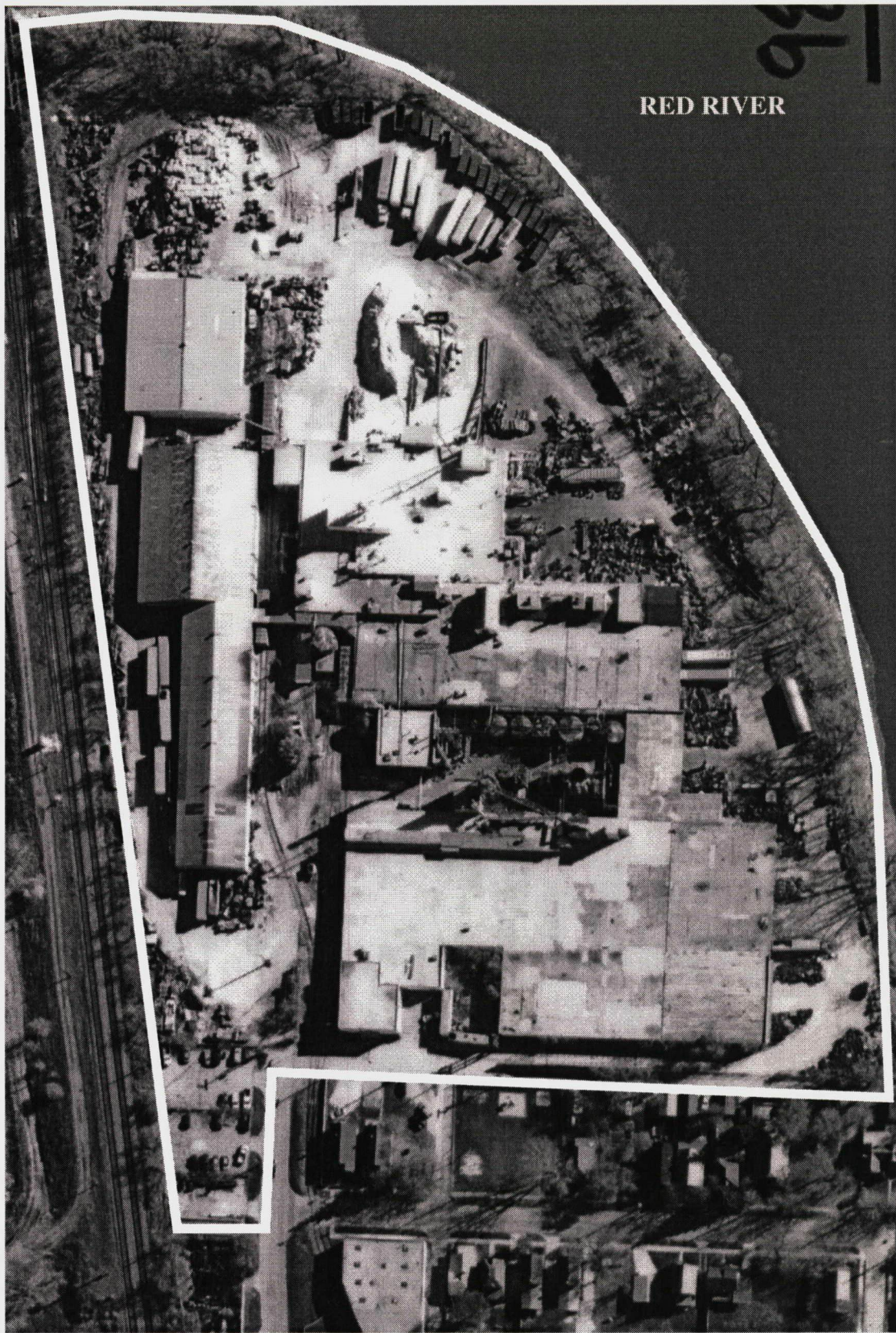




RED RIVER

AERIAL PHOTOGRAPH - 1988





AERIAL PHOTOGRAPH - 1998



APPENDIX B

Site Photographs (46)



PHOTOGRAPH #1: Interior view of Building A, facing east.



PHOTOGRAPH #2: Interior view of Building B, facing east.



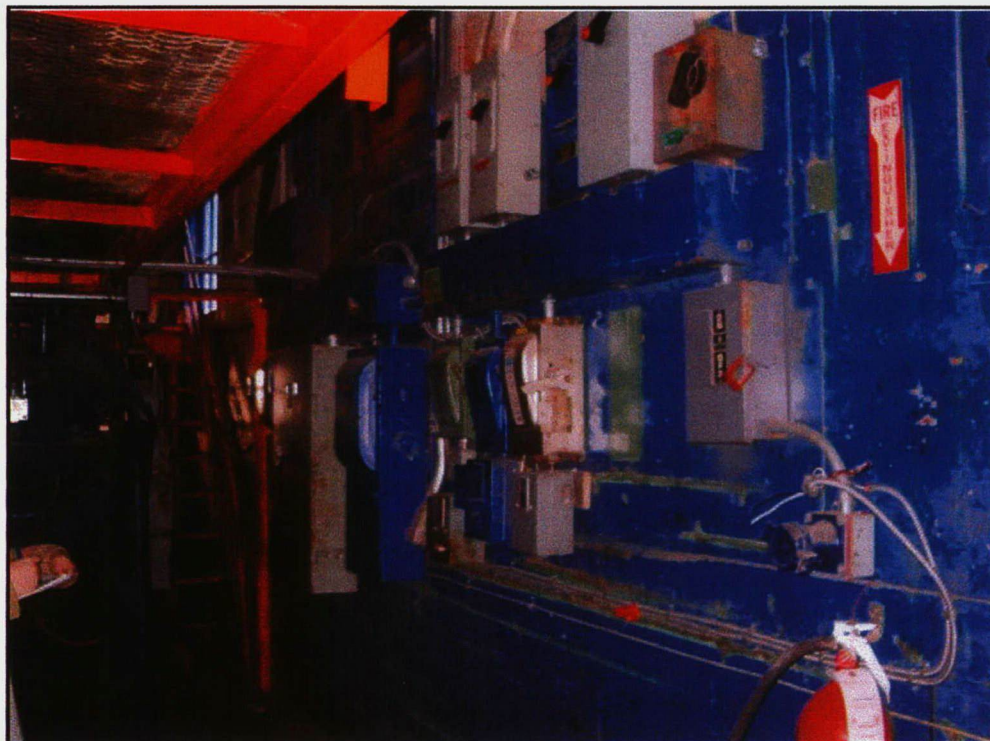
PHOTOGRAPH #3: View of paper bailing operation in Building C.



PHOTOGRAPH #4: View of stored oil drums in Building C.



PHOTOGRAPH #5: View of office on the first floor of Building D.



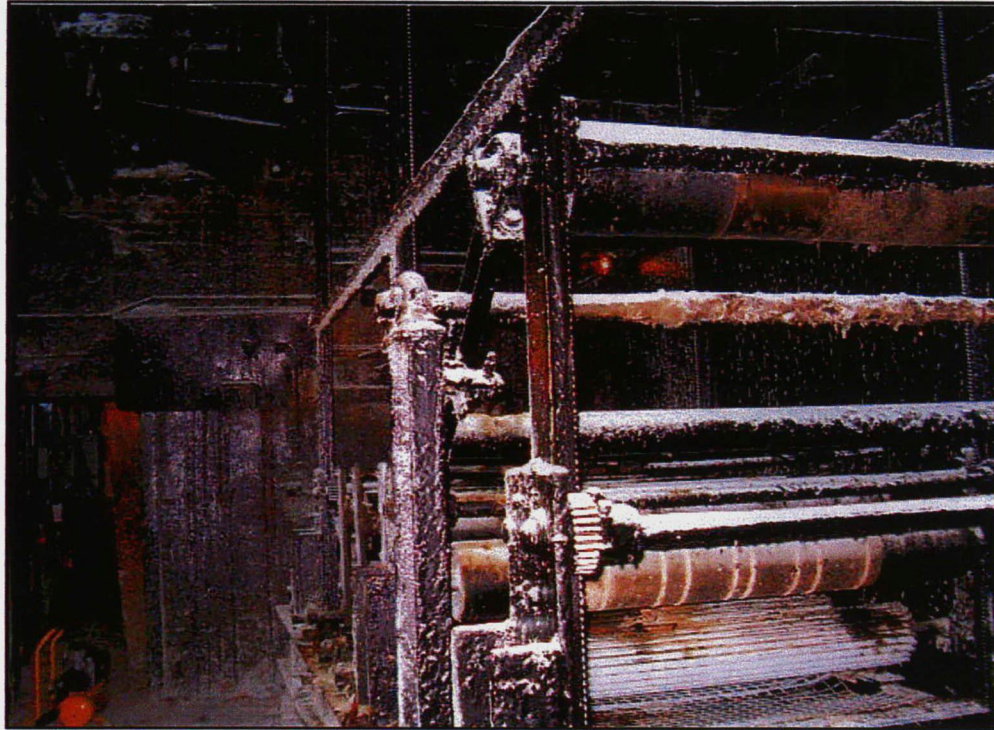
PHOTOGRAPH #6: View of electrical panel along the east wall in Building E.



PHOTOGRAPH #7: View of overhead natural gas unit heater in Building E.



PHOTOGRAPH #8: View of cafeteria, now used as storage, in Building E.



PHOTOGRAPH #9: View of roofing felt paper operation in Building E.



PHOTOGRAPH #10: View of the tar covered concrete floor in the basement of Building E.



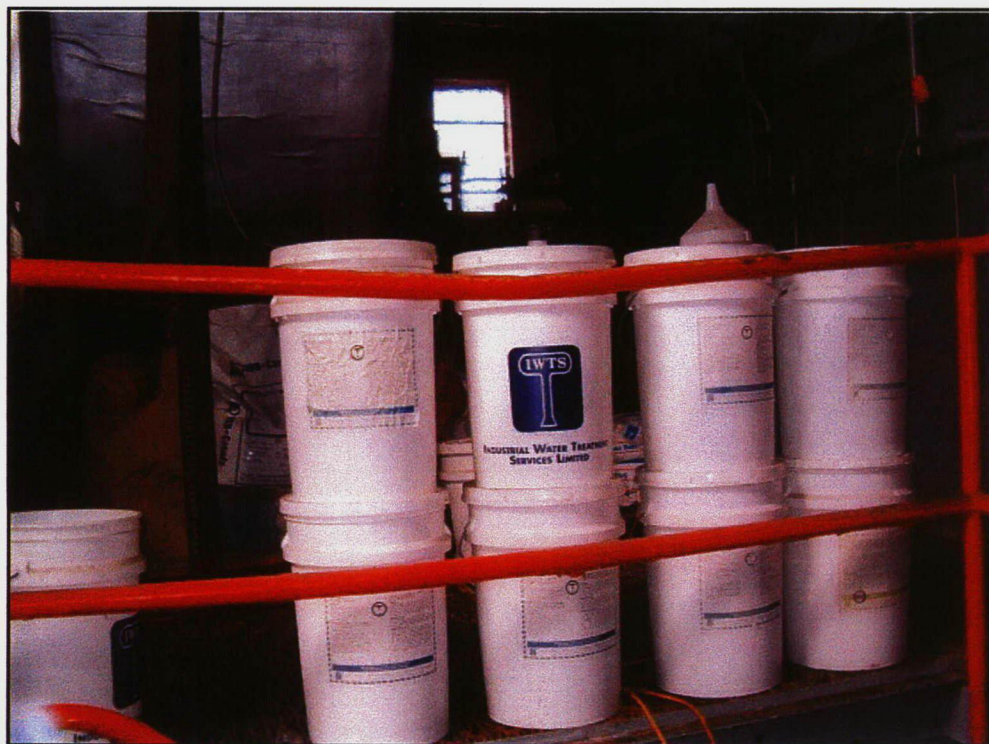
PHOTOGRAPH #11: View of two partial transformers stored in Building E.



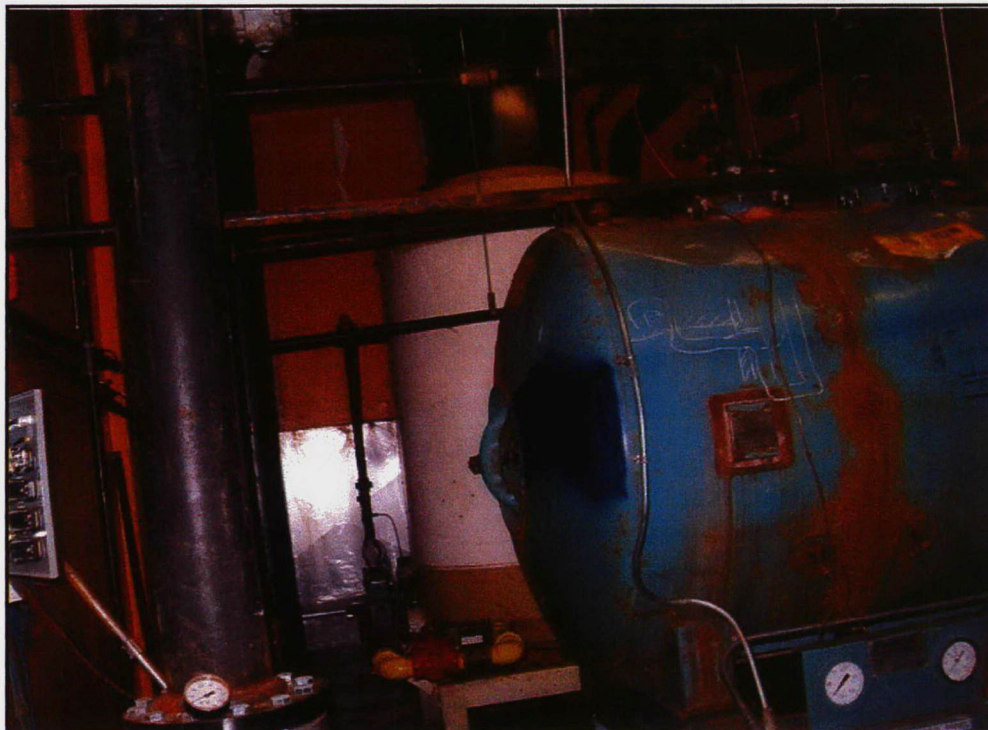
PHOTOGRAPH #12: View of causeway through Building H.



PHOTOGRAPH #13: View of catwalks in the boiler house, Building I.



PHOTOGRAPH #14: Industrial waste phosphate treatment containers in Building I.



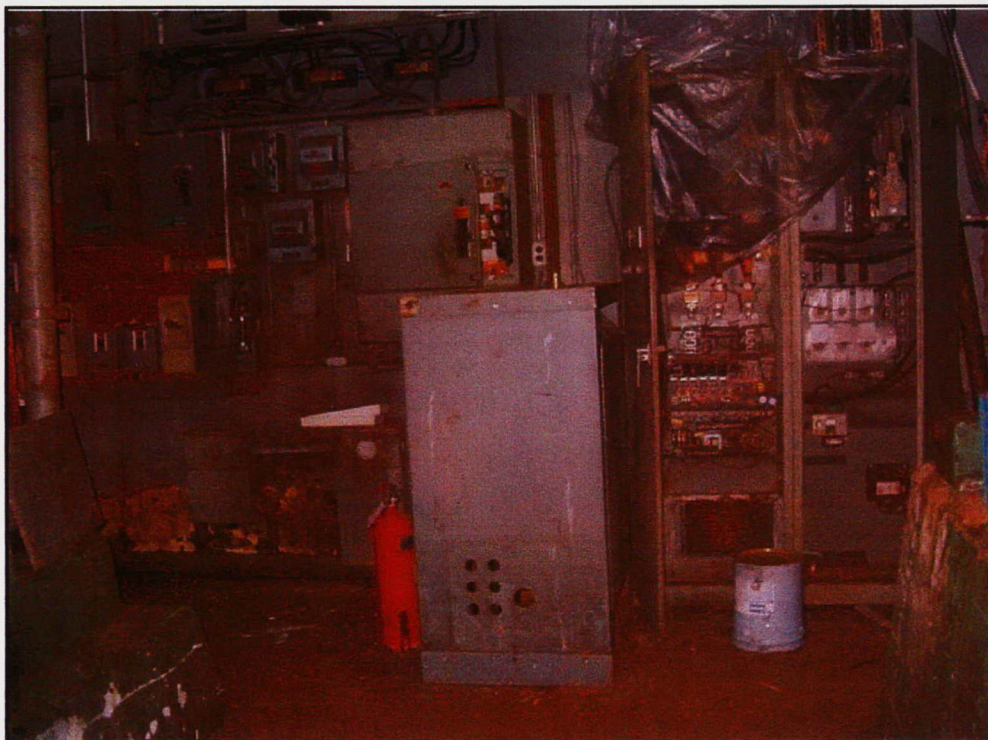
PHOTOGRAPH #15: View of natural gas boilers in Building J.



PHOTOGRAPH #16: Three transformers stored in Building J.



PHOTOGRAPH #17: View of the paper making operation in Building K.



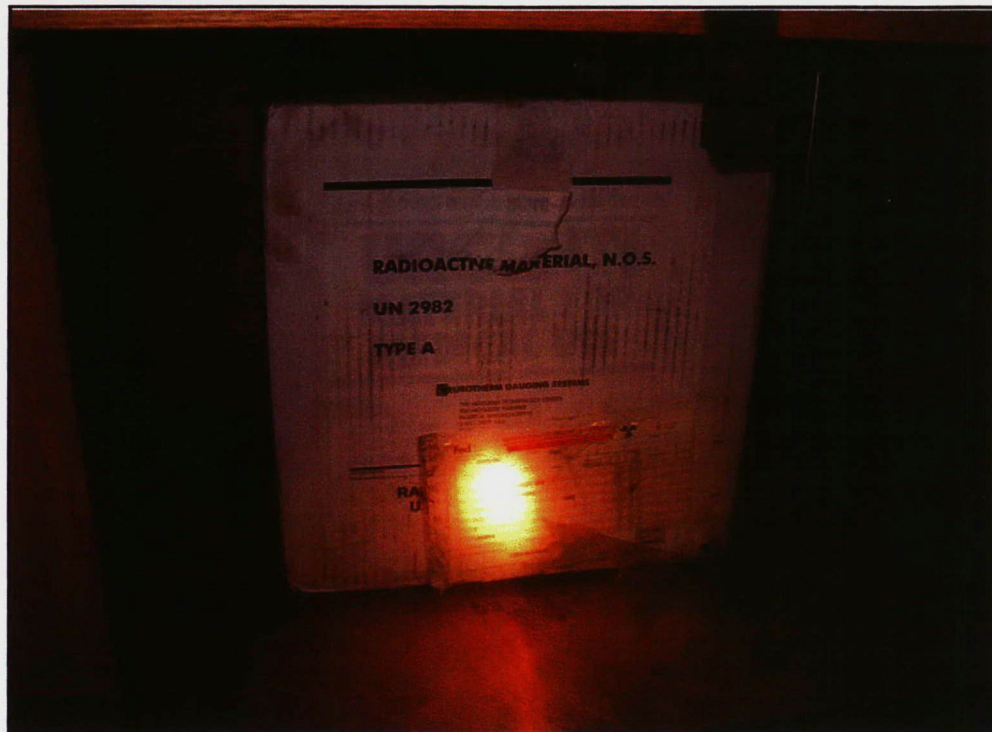
PHOTOGRAPH #18: View of an electrical panel with a dry transformer in Building K.



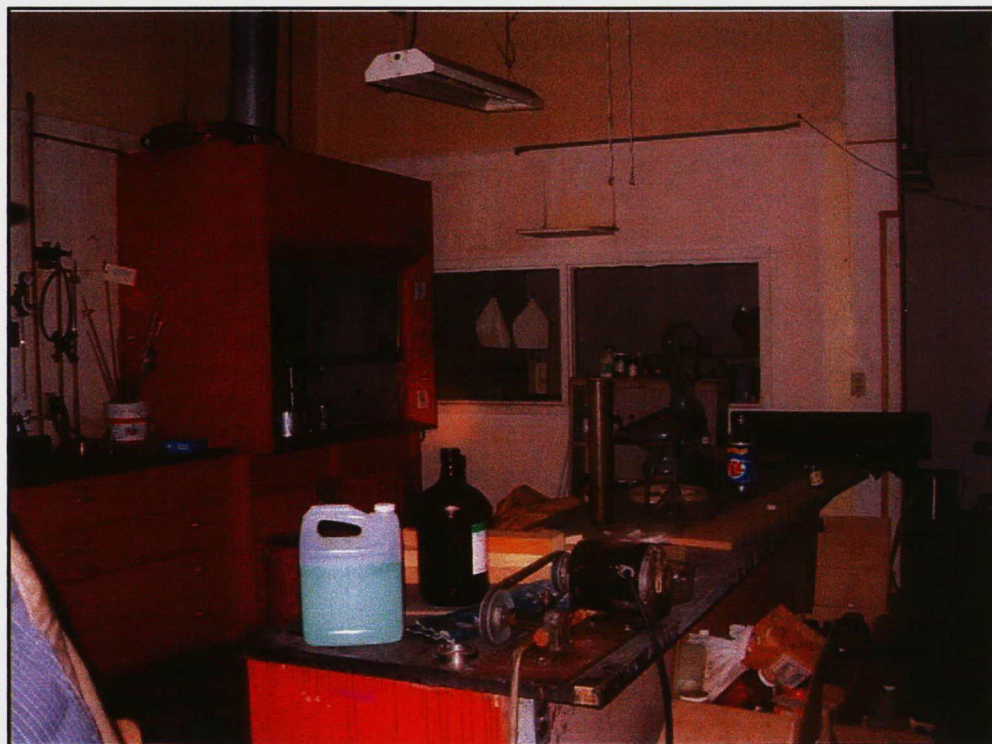
PHOTOGRAPH #19: View of a transformer with 9 banks containing PCBs in Building K.



PHOTOGRAPH #20: View of caustic soda tanks in the northwest corner of Building K.



PHOTOGRAPH #21: View of nuclear densometer in the laboratory in Building K.



PHOTOGRAPH #22: View of the laboratory in Building K.



PHOTOGRAPH #23: View of a vehicle weigh scale along the western property line.



PHOTOGRAPH #24: View of non-operational weigh scale southeast of Building E.



PHOTOGRAPH #25: View of a rail spur facing east.



PHOTOGRAPH #26: View of a rail spur facing west.



PHOTOGRAPH #27: View of metal storage along the north property line facing east.



PHOTOGRAPH #28: View of storage near the river at the south property line facing east.



PHOTOGRAPH #29: View of metal storage south of Building J, facing north.



PHOTOGRAPH #30: View of paper storage at the eastern end of the property, facing west.



PHOTOGRAPH #31: View of paper storage at the eastern end of the property, facing east.



PHOTOGRAPH #32: View of empty battery casings near the northeast corner of Building A.



PHOTOGRAPH #33: View of embedded shingles along the riverbank, facing north.



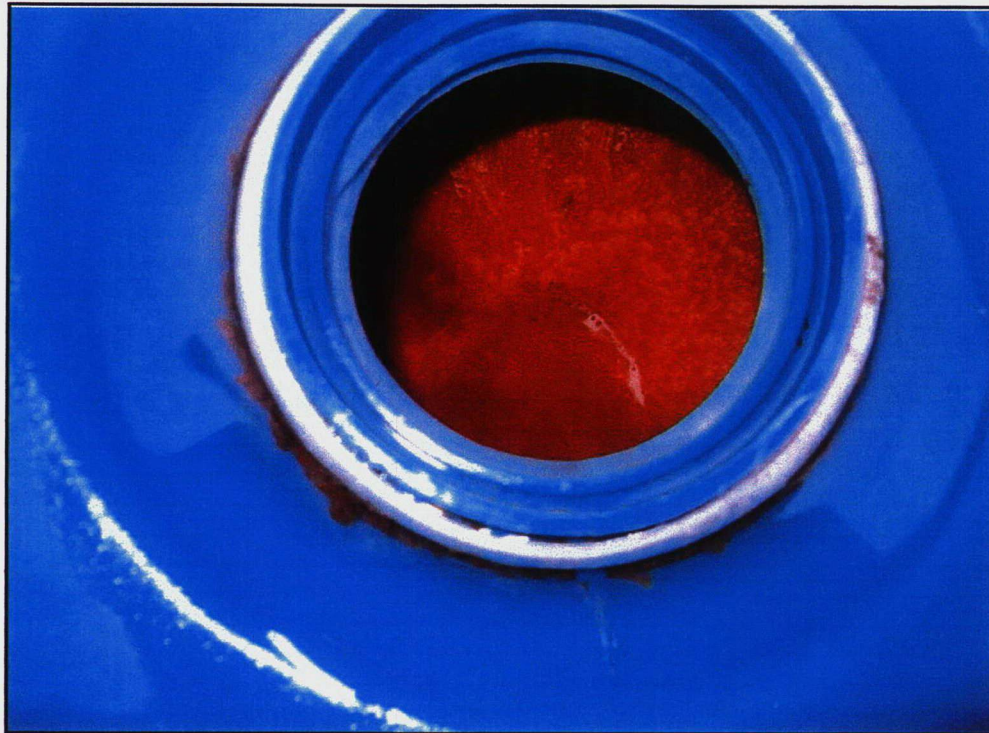
PHOTOGRAPH #34: View of neighboring residences from the northwest corner of the property.



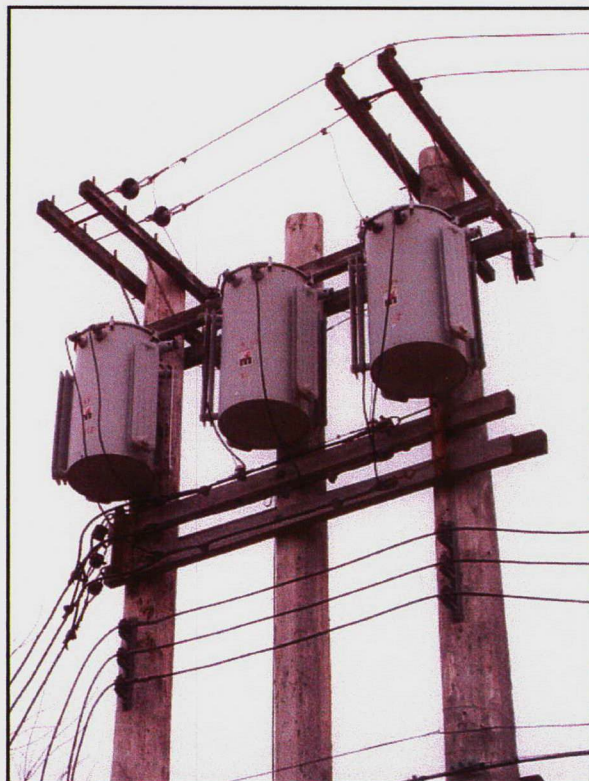
PHOTOGRAPH #35: View of an apparent oil spill along the east side of Building E.



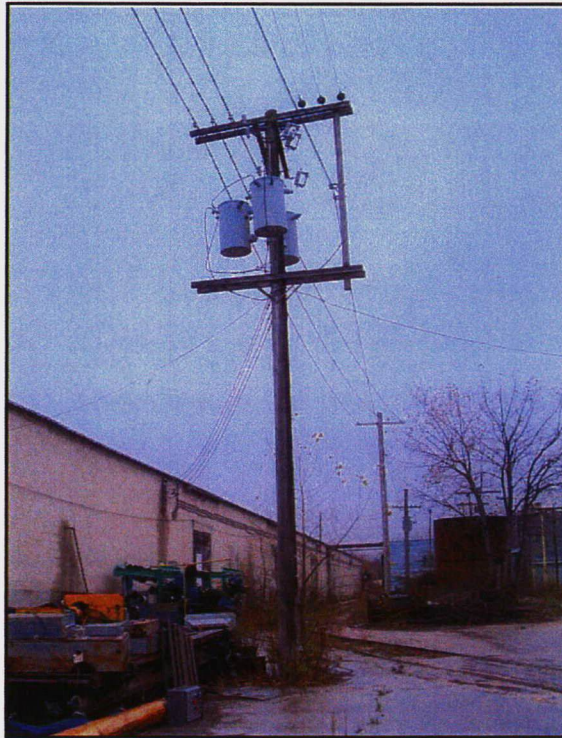
PHOTOGRAPH #36: View of two barrels south of Building K.



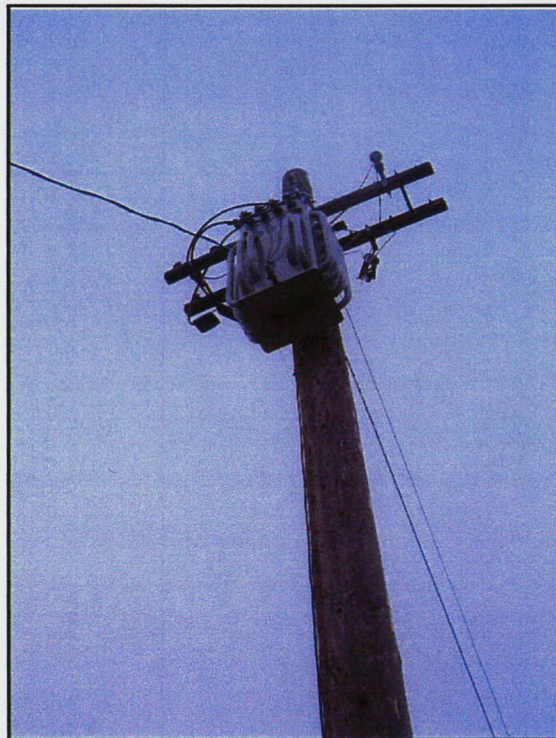
PHOTOGRAPH #37: View inside an unlabeled storage barrel, southeast of Building K.



PHOTOGRAPH #38: Three pole mounted transformers northwest of Building F.



PHOTOGRAPH #39: Three pole mounted transformers southwest of Building A.



PHOTOGRAPH #40: View of a single pole mounted transformer south of Building A.



PHOTOGRAPH #41: Metal shed containing 9 transformers adjoining Building K.



PHOTOGRAPH #42: View of 2 Bunker-C fuel tanks, surrounded by a concrete berm, on the west side of Building I.



PHOTOGRAPH #43: View of two unused steel tanks at the southeast corner of Building E.



PHOTOGRAPH #44: View of asphalt tanks between Buildings J and E, facing south.



PHOTOGRAPH #45: View of a thermal oil tank on the left and an asphalt tank on the right.



PHOTOGRAPH #46: View of a propane tank on the south side of Building J.

APPENDIX C

Legal Description

Legal Description for #2 Point Douglas Avenue (South)

Title No.: 1569469, River Lots 18 and 19, Parish of St. John
Title No.: 1569475, River Lot 20, Parish of St. John
Title No.: 1569477, River Lots 21 and 22, Parish of St. John lying South of Railway Plan 4330, excepting out of River Lot 22 the westerly 143.6 feet perpendicular excepting out of both lots, all mines and minerals as set forth in Instrument No. 787710.
Title No.: 1569478, River Lots 23 and 24, Parish of St. John lying to the South of Railway Plan 4330, excepting out of River Lot 23 the easterly 48.65 feet perpendicular, excepting out of both lots, all mines and minerals, as set forth in Instrument No. 787710.
Title No.: 1569481, all that portion of the westerly 143.6 feet perpendicular of River Lot 22 Parish of St. John lying to the south of Railway Plan 4330 except as set forth in Instrument No. 787710, AND all that portion of the easterly 48.65 feet perpendicular of River Lot 23 Parish of St. John lying to the south of Railway Plan 4330, excepting out of Parcel 2, all mines and minerals, as set forth in Instrument No. 787710.
Title No.: 1569144, Parcels 1 to 9 Plan 7088 in closed government road allowance Parish of St. John.