



Designated Substances Survey

SAP # 3605 -Keele Street Public School -
Accessibility Project Work Locations
99 Mountview Ave
Toronto, Ontario

Prepared for:

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Facility Services
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Project No. 32459



EXECUTIVE SUMMARY

RiskCheck Inc. (RiskCheck) was retained by Toronto District School Board, (TDSB, Client) to conduct a limited intrusive Designated Substances Survey (DSS) within the accessibility project work locations (as defined by the drawings provided with the Bundle 7 RFP) in the school building known as Keele Street Public School located at 99 Mountview Ave in Toronto, Ontario (subject building).

The DSS was conducted to meet the requirements of Section 30 in the Ontario Occupational Health and Safety Act (OHSA), Revised Statutes of Ontario (R.S.O.) 1990, (as amended). The DSS included a visual examination and assessment of the presence and condition of the 11 designated substances regulated under the Ontario OHSA. In addition to the 11 regulated designated substances, RiskCheck also visually inspected the accessibility project work locations for the possibility of suspect mould growth.

Furthermore, RiskCheck understands that the DSS was requested by TDSB for their due diligence purposes in preparation for an upcoming renovation of the proposed locations.

Fieldwork was conducted on March 26, 2026, and included the collection of bulk samples from building materials suspected to contain asbestos, and paint suspected to contain lead, along with a visual inspection for other designated substances and suspect mould growth.

Summary of Findings:

The following hazardous materials were identified to be present in the accessibility project work locations:

Asbestos:

Asbestos-containing materials (ACM) were identified in the accessibility project work locations as follows:

- 12"x12" vinyl floor tile - orange with dark orange, light orange and white flecks (previously identified);
- 2'x4' acoustic lay in ceiling tile - small holes and pinholes in circular pattern (previously identified); and
- White concrete block sealant.

All asbestos containing materials were observed to be in good condition. Refer to Appendix A for details regarding quantities and specific locations of ACM.

ACM may also be present in building materials that were inaccessible to sample as listed in Appendix F of this report.

Lead:

- Red paint (Sample No. LS-01) on concrete wall, yellow paint (Sample No. LS-02) on concrete wall and blue paint (LS-03) on metal door in the basement stage (Loc# 73832) were determined to



have a lead concentration exceeding the 0.009% limit as noted by the Federal Surface Coating Materials Regulation, SOR/2016-193 made under the Canada Consumer Product Safety Act;

- White paint (Sample No. LS-04) on concrete wall in entrance vestibule (Loc# 48777) was determined to have a lead concentration exceeding the 0.009% limit as noted by the Federal Surface Coating Materials Regulation, SOR/2016-193 made under the Canada Consumer Product Safety Act; and
- Lead-acid batteries are presumed to be present in emergency light fixtures; and
- Lead may also be present in electronic components (e.g., wiring connections, wire bundles, etc.), and plumbing solder.

Mercury:

- Mercury as a vapour may be present in fluorescent light tubes and high intensity discharge bulbs and compact fluorescent light bulbs; and
- Mercury may also be present in batteries, and some modern technologies including LCD screens, laptop computers.

Silica:

- Crystalline silica is presumed to be present in building materials including concrete, cinder block, mortar, brick, drywall, ceiling tiles, plaster, and ceramic products.

Water Damage and / or Visible Suspect Mould:

- Apparent water damage and visible suspect mould growth was not identified in visually accessible areas of project work areas.

Summary of Recommendations:

Based on the results of the DSS, the following conclusions and recommendations are provided:

- 1) Additional ACM may be present outside the accessible areas and materials of the accessibility project work locations. If concealed materials are observed during renovation/demolition activities, it is recommended to sample the materials and submit for analysis of asbestos content.
- 2) Any disturbance or removal of ACM must be completed by trained and qualified personnel following appropriate asbestos abatement work procedures as defined in O. Reg. 278/05 (as amended).
- 3) It is recommended that known ACM remaining after the accessibility project work, continue to be managed through the onsite Asbestos Management Program (AMP) for the subject building. The AMP should be inclusive of asbestos and regulatory background, asbestos records, procedures to notify building occupants and contractors, work procedures, and training requirements for workers.

- 4) It is recommended that asbestos containing 12"x12" orange with dark/light orange and white flecks vinyl floor tiles in the Stage (Loc#73832) and 2'x4' small holes and pinholes in circular pattern in Entrance Vestibule (Loc# 48777) be removed following Type 1 asbestos work procedures as per O. Reg. 278/05 (as amended) where such materials are to be disturbed or impacted by the accessibility project work.
- 5) It is recommended that asbestos containing white concrete block sealant be removed following Type 1 asbestos work procedures as per O. Reg. 278/05 (as amended) where the concrete block walls are to be disturbed or impacted by the planned accessibility project work.
- 6) As part of the on-going management of ACM within the subject building and to maintain compliance with O. Reg. 278/05 (as amended); the ACM must be inspected to determine if the conditions of the ACM have changed and if they may require repair or removal and the asbestos record must be updated at least once in a 12-month period.
- 7) Appropriate worker protection (e.g., respiratory protection), as outlined in the Ontario Ministry of Labour *Guideline – Lead on Construction Projects*, April 2011, should be employed when conducting demolition or renovation work that will create lead dust.
- 8) It is recommended that disposal of out-of-service fluorescent light tubes or any other mercury containing materials or equipment be completed in accordance with *General – Waste Management* Reg. 347 (as amended).
- 9) Appropriate worker protection (e.g., respiratory protection), as outlined in the Ontario MOL *Guideline – Silica on Construction Projects*, April, 2011, should be utilized when conducting renovation/demolition activities that may disturb or create silica dust.



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1.0 INTRODUCTION AND SCOPE

RiskCheck Inc. (RiskCheck) was retained by Toronto District School Board, (TDSB, Client) to conduct a limited intrusive Designated Substances Survey (DSS) within the accessibility project work locations (as defined by the drawings provided with the Bundle 7 RFP) in the school building known as Keele Street Public School located at 99 Mountview Ave in Toronto, Ontario (subject building).

The DSS was conducted to meet the requirements of Section 30 in the Ontario Occupational Health and Safety Act (OHSA), Revised Statutes of Ontario (R.S.O.) 1990, (as amended). The DSS included a visual examination and assessment of the presence and condition of the 11 designated substances regulated under the Ontario OHSA. In addition to the 11 regulated designated substances, RiskCheck also visually inspected the accessibility project work locations for the possibility of suspect mould growth.

Furthermore, RiskCheck understands that the DSS was requested by TDSB for their due diligence purposes in preparation for an upcoming renovation of the proposed locations.

The DSS was performed by Ms. Moya Zhang of RiskCheck on March 26, 2026. Access to the subject building was provided by the on-duty caretaker of TDSB. The RiskCheck Representative was unaccompanied during the DSS site visit.

1.1 Scope of Work

The limited intrusive DSS was completed to determine the presence and/or absence of potentially hazardous building materials that may be present within the proposed locations for phased service or construction and to document their locations, and condition.

The following list are substances currently considered Designated Substances by the Ontario Ministry of Labour (MOL), as defined by O. Reg. 490/09 (as amended):

- Acrylonitrile
- Benzene
- Isocyanates
- Silica
- Arsenic
- Coke Oven Emissions
- Lead
- Vinyl Chloride
- Asbestos
- Ethylene Oxide
- Mercury

The following Designated Substances may be identified in an industrial / manufacturing type facility and are not typically identified in the building construction type for this DSS:

- Acrylonitrile
- Benzene
- Ethylene Oxide
- Vinyl Chloride
- Arsenic
- Coke Oven Emissions
- Isocyanates

For the purposes of this report, these other Designated Substances are not included in this assessment or discussed further unless they have been visually identified and / or are suspected to be present based on the site-specific findings.



The DSS conducted by RiskCheck consisted of the following:

- Review of previous environmental reports (including previous surveys, drawings, abatement reports etc.) pertaining to the subject building provided to RiskCheck by the Client;
- A visual inspection and/or inquiry with the site contact as to the possible presence of suspect or known Designated Substances and confirmation of content by review of available background information or analytical testing (e.g., for asbestos and lead);
- A visual examination of all accessible areas of the accessibility project work locations for the presence of building materials known or suspected to contain Designated Substances;
- Collection and submission of bulk and paint samples of selected building materials for laboratory analysis of asbestos and lead respectively;
- Obtain representative site photographs of the accessibility project work locations conditions; and
- Preparation of a report summarizing the findings of items above and providing recommendations as necessary regarding the ongoing management of Designated Substances identified at the accessibility project work locations.

2.0 BACKGROUND INFORMATION

2.1 Building Description

Component	Subject Building Features	
Building Use:	Public elementary school.	
Number of Buildings	One (1)	
Number of Levels:	Three storey slab-on-grade with basement level below grade.	
Approximate Building Area:	Square Metres (m ²): 6,312	Square Feet (ft ²): 67,941
Year of Construction:	1978	Known Additions / Renovations: Unknown
Flooring Finishes (Accessibility Project Work Locations):	Concrete (poured), vinyl sheet flooring, and vinyl floor tiles.	
Wall Finishes (Accessibility Project Work Locations):	Concrete block and wood panel above the door.	
Ceiling Finishes (Accessibility Project Work Locations):	Acoustic lay-in ceiling tiles and open to concrete deck.	



Component	Subject Building Features
Building Structure:	<u>Floor</u> : Concrete
	<u>Wall Frame</u> : Concrete block and structural steel (e.g., columns).
	<u>Ceiling Frame</u> : Concrete (e.g., beam, deck) and structural steel (e.g., beam, deck, joist).
Building Exterior Facade:	Aluminum soffits/fascia, brick, glass curtain wall, and glazing, metal panel.
Roofing Type:	Not accessed (out of the work scope).
Heating, Ventilation and Air Conditioning (HVAC):	Not accessed (out of the work scope).

The subject building was occupied by Keele Street Public School at the time of the site visit.

2.2 Accessible Areas

All accessibility project work locations within the subject building were accessible at the time of the Designated Substances Survey.

2.3 Previous Environmental Records Review

As part of the DSS, RiskCheck reviewed the following reports:

- “ASBESTOS BUILDING MATERIALS REASSESSMENT SURVEY, Keele Street Public School, 99 Mountview Ave, Toronto, Ontario” report, prepared for TDSB by ECOH Management Inc., dated June, 2023.

Designated Substances previously observed in the subject building include:

- Asbestos containing 2’x4’ acoustic lay in ceiling tile - small holes and pinholes in circular pattern;
- Asbestos containing grout between patterned concrete;
- Asbestos containing 12”x12” vinyl floor tile - orange with dark orange, light orange and white flecks;
- Asbestos containing 12”x12” vinyl floor tile - dark green with white flecks;
- Asbestos containing fire stop parging - grey;
- Presumed asbestos containing brown baseboard mastic;
- Presumed asbestos containing drywall joint compound;
- Presumed asbestos containing brown window caulking;
- Presumed asbestos containing chalkboard;
- Presumed asbestos containing window sealers;
- Presumed asbestos containing roof materials;
- Presumed asbestos containing floor mastic;
- Presumed asbestos containing 12”x12” vinyl floor tile - light and dark blue marbled pattern;
- Presumed asbestos containing 12”x12” vinyl floor tile - blue with dark Blue, white and red flecks;



- Presumed asbestos containing 12"x 12" vinyl floor tile - dark blue with light blue Flecks;
- Presumed asbestos containing 12"x12" vinyl floor tile - greyish blue with white flecks;
- Presumed asbestos containing 12"x12" vinyl floor tile - green with dark green and light green flecks;
- Presumed asbestos containing 12"x12" vinyl floor tile - light green with green and white flecks;
- Presumed asbestos containing 12"x12" vinyl floor tile - pale red with light and dark pale red flecks;
- Presumed asbestos containing brick/block/concrete mortar;
- Presumed asbestos containing tar adhesive material;
- Presumed asbestos containing bell and spigot joints;
- Presumed asbestos containing built up membrane roof;
- Presumed asbestos containing black baseboard mastic; and
- Presumed asbestos containing white wall caulking.

3.0 FINDINGS

The following section summarizes the findings of the DSS and provides a general description of the building materials identified, along with their locations. For details on approximate quantities and locations of building materials, please refer to the Summary of Suspect and Confirmed Asbestos Containing Materials in Appendix A.

3.1 Asbestos

3.1.1 Spray Applied Fireproofing

Spray applied fireproofing was not observed within the visually accessible areas of the accessibility project work locations.

3.1.2 Textured Finishes

Textured finishes were not observed within the visually accessible areas of the accessibility project work locations.

3.1.3 Plaster Finishes

Plaster finishes were not observed within the visually accessible areas of the accessibility project work locations.

3.1.4 Drywall Joint Compound

Drywall joint compound was not observed within the visually accessible areas of the accessibility project work locations.

3.1.5 Acoustic Lay-in Ceiling Tiles

One (1) visually distinct types of acoustic lay-in ceiling tiles were observed in the accessibility project work locations and was sampled previously as follows:

Sample No.	Locations	Material Description (Size, Pattern, Date Code)	Asbestos Result
-	Loc# 48777 Entrance Vestibule	2'x4' small holes and pinholes in circular pattern	1.8% Amosite Visually Similar to Pervious Sample No.3605-10-1 (ECOH 2023)

3.1.6 Mechanical Equipment and Pipe Insulation

Suspect asbestos-containing mechanical insulation (e.g., boiler units, chiller units, hot water tanks, generator exhaust etc.) were not observed within the visually accessible areas of the accessibility project work locations.

All piping and mechanical equipment within the visually accessible areas of the accessibility project work locations was observed to be uninsulated.

3.1.7 Duct Insulation and Mastic

All ductwork within the visually accessible areas of the accessibility project work locations was observed to be uninsulated.

3.1.8 Asbestos Cement (Transite) Products

Asbestos-containing cement products (such as cement piping and/or panels) were not observed within the visually accessible areas of the accessibility project work locations.

3.1.9 Vinyl Floor Tiles

Vinyl floor tiles that were observed in the visually accessible areas of the accessibility project work locations and were suspected to contain asbestos, were sampled as follows:

Sample No.	Locations	Material Description (Size, Colour, Pattern)	Asbestos Result
-	Loc#73832 Stage	12"×12" Orange with Dark/Light Orange and White Flecks Vinyl Floor Tiles	2% Chrysotile Visually Similar to Pervious Sample No.1 (ECOH 2023)



Sample No.	Locations	Material Description (Size, Colour, Pattern)	Asbestos Result
MA-01a-A	Loc#73832 Stage / Stair Landing	Brown Mastic associated with 12"×12" Orange with Dark/Light Orange and White Flecks Vinyl Floor Tiles	None Detected
MA-01a-B		Light Grey Cementitious Material associated with 12"×12" Orange with Dark/Light Orange and White Flecks Vinyl Floor Tiles	None Detected
MA-01b-c	Loc#73832 Stage / Stair Landing	Brown Mastic associated with 12"×12" Orange with Dark/Light Orange and White Flecks Vinyl Floor Tiles	None Detected
-	Loc# 48777 Entrance Vestibule	12 x 12 Beige with Light and Dark Dense Irregular Reddish Brown Flecks Vinyl Floor Tile and associated black mastic.	None Detected Visually Similar to Previous Sample No. 3605-072012 2666-01-03 (ECOH 2023)

3.1.10 Vinyl Sheet Flooring

Vinyl sheet flooring that was observed in the visually accessible areas of the accessibility project work locations and visually confirm non asbestos as follows:

Sample No.	Locations	Material Description (Colour, Pattern)	Asbestos Result
-	Loc#73832 Stage / Stair	Green (Without Paper Backing)	Visually Confirmed Non-Asbestos

3.1.11 Vermiculite

Loose fill vermiculite insulation was not observed within the visually accessible areas of the accessibility project work locations.

3.1.12 Caulking, Putty, and Tars

Caulking was observed in the visually accessible areas of the accessibility project work locations and visually confirm non asbestos as follows:

Sample No.	Locations	Material Description (Colour)	Asbestos Result
-	Loc# 48777 Entrance Vestibule	Brown Door Caulking	Newer doors and caulking, with no secondary layer observed beneath. Visually confirmed non asbestos
		White Door Caulking	

3.1.13 Miscellaneous Building Materials

The following miscellaneous building materials that were observed in the visually accessible areas of the accessibility project work locations and were suspected to contain asbestos, are summarized as follows:

Sample No.	Locations	Material Description (Colour)	Asbestos Result
MA-02a-c	Loc#73832 Stage /Stair Location	Brown Baseboard Mastic	None Detected
MA-03a-c	Loc#73832 Stage /Stair	Brown Mastic under Green Vinyl Sheet Flooring	None Detected
MA-04a-b-A	Loc# 48777 Entrance Vestibule	Yellow Baseboard Mastic	None Detected
MA-04a-b-B		Grey Cementitious Material	None Detected
MA-04c	Loc# 48777 Entrance Vestibule	Yellow Baseboard Mastic	None Detected
CBM-01a	Loc#73832 Stage /Stair Location	Interior Concrete Block Mortar	None Detected
CBM-01b	Loc#73834 Storage Room	Interior Concrete Block Mortar	None Detected
CBM-01c	Loc#48777 Entrance Vestibule	Interior Concrete Block Mortar	None Detected
CBS-01a	Loc#73832 Stage /Stair Location	White Concrete Block Sealant	0.5% Chrysotile
CBS-01b	Loc# 48777 Entrance Vestibule	White Concrete Block Sealant	Not Analyzed
CBS-01c		White Concrete Block Sealant	Not Analyzed

All visually similar building materials in other areas of the accessibility project work locations should be presumed to contain asbestos.

Based on the reported age of the subject building and visual observations noted during the DSS, no other building materials suspected to contain asbestos were identified in the visually accessible areas of the accessibility project work locations.

3.2 Lead

The following table summarizes the locations, surfaces and analytical results of the various paint samples at the accessibility project work locations.

Sample No.	Description of Room	Description of Paint / Substrate	Condition (Good/Fair/Poor)	Lead Content (% Lead by Dry Weight)
LS-01	Loc#73832 Stage	Red Paint on Concrete Wall	Good	1.13%
LS-02	Loc#73832 Stage	Yellow Paint on Concrete Wall	Good	0.732%
LS-03	Loc#73832 Stage	Blue/ Orange Paint on Metal Door	Good	3.12%
LS-04	Loc# 48777 Entrance Vestibule	White Paint on Concrete Wall	Good	0.161%

As indicated in the table provided above and the attached Laboratory Certificate of Analysis, lead concentrations exceeding 0.009% (or 90 ppm or 90 mg/kg) by dry weight were detected in all four (4) samples analyzed.

Paints with a detectable concentration of lead below the Federal Surface Coating Materials Regulation, SOR/2016-193 limit (defined as having a lead content of 0.009% (or 90 ppm or 90 mg/kg) by dry weight or greater) should still be considered lead-containing.

3.2.1 Potential Lead Containing Products

Lead may be present in several materials which were not assessed and/or sampled. The following materials, where found, should be presumed to contain lead.

- Lead-acid batteries are presumed to be present in emergency light fixtures;
- Electrical components, including wiring connectors, grounding conductors, and solder.

3.3 Mercury

Mercury in the form of vapour may be present within the fluorescent light tubes throughout the accessibility project work locations. At the time of the site visit, fluorescent light tubes were noted to be intact.

Liquid mercury containing thermostats were not observed in the accessibility project work locations

3.3.1 Potential Mercury Containing Products

Mercury may be present in several materials which were not assessed and/or sampled. The following materials, where found, should be presumed to contain mercury.



- Fluorescent light tubes, compact fluorescent light bulbs and lamps,
- Batteries, and
- Some modern technologies including LCD screens, and laptop computers.

3.4 Silica

Crystalline silica is a presumed component of the following materials:

- Poured or pre-cast concrete,
- Masonry and mortar,
- Drywall, and
- Ceiling tiles.

3.5 Water Damage and / or Visible Suspect Mould Growth

Apparent water damage and visible suspect mould growth was not identified in visually accessible areas of the accessibility project work locations.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the results of the DSS, the following conclusions and recommendations are provided:

- 1) Additional ACM may be present outside the accessible areas and materials of the accessibility project work locations. If concealed materials are observed during renovation/demolition activities, it is recommended to sample the materials and submit for analysis of asbestos content.
- 2) Any disturbance or removal of ACM must be completed by trained and qualified personnel following appropriate asbestos abatement work procedures as defined in O. Reg. 278/05 (as amended).
- 3) It is recommended that known ACM remaining after the accessibility project work, continue to be managed through the onsite Asbestos Management Program (AMP) for the subject building. The AMP should be inclusive of asbestos and regulatory background, asbestos records, procedures to notify building occupants and contractors, work procedures, and training requirements for workers.
- 4) It is recommended that asbestos containing 12"x12" orange with dark/light orange and white flecks vinyl floor tiles in the Stage (Loc#73832) and 2'x4' small holes and pinholes in circular pattern in Entrance Vestibule (Loc# 48777) be removed following Type 1 asbestos work procedures as per O. Reg. 278/05 (as amended) where such materials are to be disturbed or impacted by the accessibility project work.



- 5) It is recommended that asbestos containing white concrete block sealant be removed following Type 1 asbestos work procedures as per O. Reg. 278/05 (as amended) where the concrete block walls are to be disturbed or impacted by the planned accessibility project work.
- 6) As part of the on-going management of ACM within the subject building and to maintain compliance with O. Reg. 278/05 (as amended); the ACM must be inspected to determine if the conditions of the ACM have changed and if they may require repair or removal and the asbestos record must be updated at least once in a 12-month period.
- 7) Appropriate worker protection (e.g., respiratory protection), as outlined in the Ontario Ministry of Labour *Guideline – Lead on Construction Projects*, April 2011, should be employed when conducting demolition or renovation work that will create lead dust.
- 8) It is recommended that disposal of out-of-service fluorescent light tubes or any other mercury containing materials or equipment be completed in accordance with *General – Waste Management* Reg. 347 (as amended).
- 9) Appropriate worker protection (e.g., respiratory protection), as outlined in the Ontario MOL *Guideline – Silica on Construction Projects*, April, 2011, should be utilized when conducting renovation/demolition activities that may disturb or create silica dust.

5.0 TERMS AND LIMITATIONS

This report was prepared for the exclusive use of Toronto District School Board (TDSB, Client). The report may not be relied upon by any other person or entity without the express written consent of RiskCheck Inc. (RiskCheck) and TDSB. Any use that a party makes of this report, or any reliance on decisions made based on it, is the sole responsibility of such parties. RiskCheck accepts no responsibility for damages, if any, suffered by any party as a result of decisions made or actions based on this report.

The information and conclusions contained in this report are based upon work undertaken by trained professional and technical staff in accordance with generally accepted engineering and scientific practices current at the time the work was performed.

RiskCheck makes no other representation whatsoever, including those concerning the legal significance of its findings, or as to the other legal matters addressed incidentally in this report, including but not limited to the application of any law to the facts set forth herein. With respect to regulatory compliance issues, regulatory statutes are subject to interpretation. These interpretations may change over time, thus TDSB should review such issues with appropriate legal counsel. The asbestos containing materials locations and conclusions provided are based on information obtained from visual inspection and limited sampling carried out, at the specific test locations, and information obtained from the building personnel. The results can only be extrapolated to an undefined area around the test locations. It is possible that additional, concealed hazardous building materials may become evident during demolition/renovation activities.

Any quantities or areas (including but not limited to damaged areas, mould affected areas, asbestos or lead containing materials) provided in this report are order-of-magnitude values or estimates and should



not be considered as exact values. Should there be a requirement for abatement (e.g., asbestos, lead, or mould), the estimated quantities or areas noted are not to be used for tender documents or providing quotations or for any other business decisions without prior consent from RiskCheck. A more detailed site investigation may be required to verify the quantity and/or areas of materials and site conditions that may affect the overall project cost. Furthermore, it is important to note that the conditions of the potential hazardous building materials may have changed since the time of the RiskCheck site visit or investigation. RiskCheck will not be held responsible for any deviations in the estimated quantities or areas documented.

The conclusions presented represent the best judgement of the assessor based on the limited intrusive sampling carried out. Due to the nature of the material investigated and the limited data available, the assessor cannot warrant against undiscovered asbestos containing materials that may still exist behind solid walls or ceilings, concealed by other enclosures/barriers, or under stored/heavy items, which would not have been visible during the inspection activities.

A copy of our Limitations, Terms and Conditions of Retainer is appended to this report as Appendix G and applies to all work performed.

We trust this report meets your current requirements. Should you have any questions or require clarification or additional information, please do not hesitate to contact the undersigned.

Respectfully submitted,

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APPENDIX A

SUMMARY OF SUSPECT AND CONFIRMED ASBESTOS CONTAINING MATERIALS

Table 1 - Summary of Suspect and Confirmed ACM Sample Results

SAP # 3605-Keele Street Public School-Accessibility Project Work Locations, 99 Mountview Ave, Toronto, Ontario



Table Notes

Accessibility

- A** - Accessible to all occupants of the subject building to approx. 2.5 m (arms reach) above floor level. Includes specific activities that may disturb material that is not normally within reach.
- B** - Areas of the subject building restricted to operations and maintenance staff and accessible to approx. 2.5 m (arms reach) above floor level.
- C₁** - Visible from floor level and accessible only with a ladder or other elevating devices.
- C₂** - Concealed from floor level and accessible only with a ladder or other elevating devices and by moving a non-fixed building component (i.e., ceiling tile or access hatch)
- D** - Not accessible without demolition or removal of fixed building components or building systems.
- A_s - D_s with Air Movement** - Areas with ACM inside a supply or return air plenum or with airflow directed at the ACM.

Action Levels

- 1 - Action dealing with the immediate cleanup of ACM debris likely to be disturbed.
- 2 - Action dealing with Type 2 isolation of an area and performing asbestos removal for regulatory compliance.
- 3 - Action dealing with Type 2 asbestos procedures for ceiling entry where friable ACM debris is present on the top side of a ceiling system.
- 4 - Action dealing with the removal of asbestos that goes beyond compliance but simplifies the asbestos management.
- 5 - Action dealing with the repair of asbestos.
- 6 - Action dealing with ACM surveillance requirements of the regulation.

Additional Information

ACM = Asbestos Containing Materials
N/E = Not Estimated
EA = Each
"Not Analyzed" indicates sample not analyzed due to positive result from homogenous sampling group.

Confirmed or Presumed ACM

General Description			Material Description			Hazard Rating & Risk Assessment					Sample Collection & Analysis				Comments	
Floor No.	Location / Room Name	Sample Date	Building System	Component	Material Description (Size, Colour, Pattern, etc.)	Condition (G / F / P / D)	Accessibility	Visible	Friability Type	Approximate Quantity	Action Level	Sample No.	Analytical Results			Figure Reference
													Percentage	Type		
2	Loc# 48777 Entrance Vestibule	-	Ceiling	Lay-In Tiles	2"x4" Small Holes and Pinholes in Circular Pattern Acoustic Lay-in Tiles	Good	C ₁	Y	Non-Friable	60 ft ²	6	Visually Similar to Sample No.3605-10-1 (ECOH 2023)	1.8%	Amosite	2	Material was previously determined to contain asbestos. Remove following Type 1 asbestos precautions as required for the Accessibility Project.
Basement	Loc#73832 Stage	-	Floor	All	12"x12" Orange with Dark/Light Orange and White Flecks Vinyl Floor Tiles	Good	A	Y	Non-Friable	8 ft ²	6	Visually Similar to Sample No.1 (ECOH 2023)	2%	Chrysotile	1	Material was previously determined to contain asbestos. Remove following Type 1 asbestos precautions as required for the Accessibility Project.
Basement	Loc#73832 Stage / Stair Landing	26-Mar-26	Floor	All	Brown Mastic associated with 12"x12" Orange with Dark/Light Orange and White Flecks Vinyl Floor Tiles	Unknown	D	N	Non-Friable	8 ft ²	-	MA-01a-A	None Detected		1	Material was determined to be non-asbestos containing.
					Light Grey Cementitious Material associated with 12"x12" Orange with Dark/Light Orange and White Flecks Vinyl Floor Tiles	Unknown	D	N	Non-Friable	8 ft ²	-	MA-01a-B	None Detected		1	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage / Stair Landing	26-Mar-26	Floor	All	Brown Mastic associated with 12"x12" Orange with Dark/Light Orange and White Flecks Vinyl Floor Tiles	Unknown	D	N	Non-Friable	-	-	MA-01b	None Detected		1	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage / Stair Landing	26-Mar-26	Floor	All	Brown Mastic associated with 12"x12" Orange with Dark/Light Orange and White Flecks Vinyl Floor Tiles	Unknown	D	N	Non-Friable	-	-	MA-01c	None Detected		1	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage /Stair Location	26-Mar-26	Walls	Interior	Brown Mastic under Green Vinyl Sheet Flooring	Unknown	D	N	Non-Friable	10 ft ²	-	MA-02a	None Detected		1	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage /Stair Location	26-Mar-26	Walls	Interior	Brown Mastic under Green Vinyl Sheet Flooring	Unknown	D	N	Non-Friable	-	-	MA-02b	None Detected		1	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage /Stair Location	26-Mar-26	Walls	Interior	Brown Mastic under Green Vinyl Sheet Flooring	Unknown	D	N	Non-Friable	-	-	MA-02c	None Detected		1	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage /Stair	26-Mar-26	Floor	All	Brown PVC Floor Mastic	Unknown	D	N	Non-Friable	16 ft ²	-	MA-03a	None Detected		1	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage /Stair	26-Mar-26	Floor	All	Brown PVC Floor Mastic	Unknown	D	N	Non-Friable	-	-	MA-03b	None Detected		1	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage /Stair	26-Mar-26	Floor	All	Brown PVC Floor Mastic	Unknown	D	N	Non-Friable	-	-	MA-03c	None Detected		1	Material was determined to be non-asbestos containing.
2	Loc# 48777 Entrance Vestibule	26-Mar-26	Walls	Interior	Yellow Baseboard Mastic	Unknown	D	N	Non-Friable	6 ft ²	-	MA-04a-A	None Detected		2	Material was determined to be non-asbestos containing.
					Grey Cementitious Material	Unknown	D	N	Non-Friable	6 ft ²	-	MA-04a-B	None Detected			Material was determined to be non-asbestos containing.
2	Loc# 48777 Entrance Vestibule	26-Mar-26	Walls	Interior	Yellow Baseboard Mastic	Unknown	D	N	Non-Friable	-	-	MA-04b-A	None Detected		2	Material was determined to be non-asbestos containing.
					Grey Cementitious Material	Unknown	D	N	Non-Friable	-	-	MA-04b-B	None Detected			Material was determined to be non-asbestos containing.
2	Loc# 48777 Entrance Vestibule	26-Mar-26	Walls	Interior	Yellow Baseboard Mastic	Unknown	D	N	Non-Friable	-	-	MA-04c	None Detected		2	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage /Stair Location	26-Mar-26	Walls	Interior	Interior Concrete Block Mortar	Good	A	Y	Non-Friable	N/E	-	CBM-01a	None Detected		1	Material was determined to be non-asbestos containing.
Basement	Loc#73834 Storage Room	26-Mar-26	Walls	Interior	Interior Concrete Block Mortar	Good	A	Y	Non-Friable	N/E	-	CBM-01b	None Detected		1	Material was determined to be non-asbestos containing.
2	Loc#48777 Entrance Vestibule	26-Mar-26	Walls	Interior	Interior Concrete Block Mortar	Good	A	Y	Non-Friable	N/E	-	CBM-01c	None Detected		2	Material was determined to be non-asbestos containing.
Basement	Loc#73832 Stage /Stair Location	26-Mar-26	Walls	Interior	White Concrete Block Sealant	Good	A	Y	Non-Friable	N/E	6	CBS-01a	0.5%	Chrysotile	1	Material was determined to be asbestos containing. All original white concrete block sealant throughout the subject building is considered to be asbestos-containing. Remove following Type 1 asbestos precautions as required for the Accessibility Project.
2	Loc# 48777 Entrance Vestibule	26-Mar-26	Walls	Interior	White Concrete Block Sealant	Good	A	Y	Non-Friable	-	6	CBS-01b	Not Analyzed		2	Based on homogenous groupings with Sample No. CBS-01a, the material is considered asbestos-containing. Manage in Place.
2	Loc# 48777 Entrance Vestibule	26-Mar-26	Walls	Interior	White Concrete Block Sealant	Good	A	Y	Non-Friable	-	6	CBS-01c	Not Analyzed		2	Based on homogenous groupings with Sample No. CBS-01a, the material is considered asbestos-containing. Manage in Place.

APPENDIX B

REPRESENTATIVE SITE PHOTOGRAPHS



Photo 1: View of the asbestos-containing 12"x12" orange with dark orange, light orange and white flecks vinyl floor tiles (see arrows), with underlying non-asbestos-containing brown floor mastic observed within the basement stage area (Loc# 73832)



Photo 2: View of a portion of the non-asbestos-containing brown baseboard mastic (see arrows) observed within the basement stage area (Loc# 73832)



Photo 3: View of the non-asbestos-containing brown mastic (see arrow) observed under green vinyl sheet flooring on the stair within the basement stage area (Loc# 73832).



Photo 4: View of the asbestos-containing 2'x4' small holes and pinholes in circular pattern (see arrow) observed within the 2nd floor entrance vestibule (Loc# 48777)



Photo 5: View of a portion of the non-asbestos-containing yellow baseboard mastic (see arrow) observed within the 2nd floor entrance vestibule (Loc# 48777)



Photo 6: View of a wood panel, without joint compound, observed above the door within the 2nd floor entrance vestibule (Loc# 48777).



Photo 7: General view of the area above the ceiling tiles, where no suspect building materials were observed within the 2nd floor entrance vestibule (Loc# 48777).

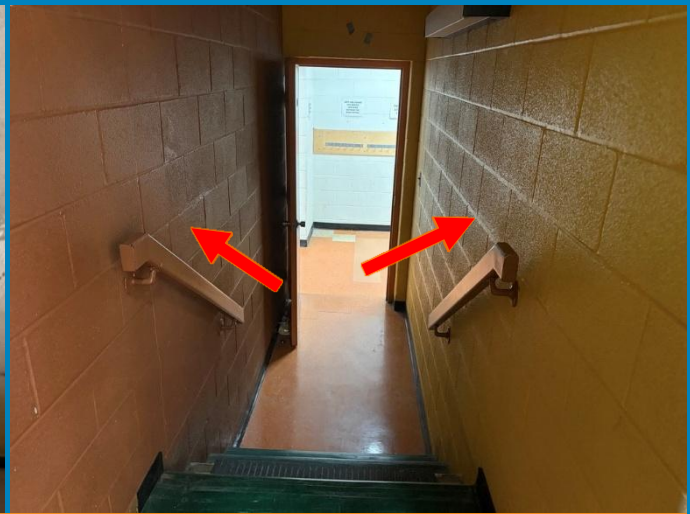


Photo 8: View of the red paint on the concrete wall (see left arrow) and yellow paint on concrete wall (see right arrow) within the basement stage area (Loc# 73832) that was determined to contain a lead concentration exceeding the 0.009% limit as outlined in the federal surface coating regulation.

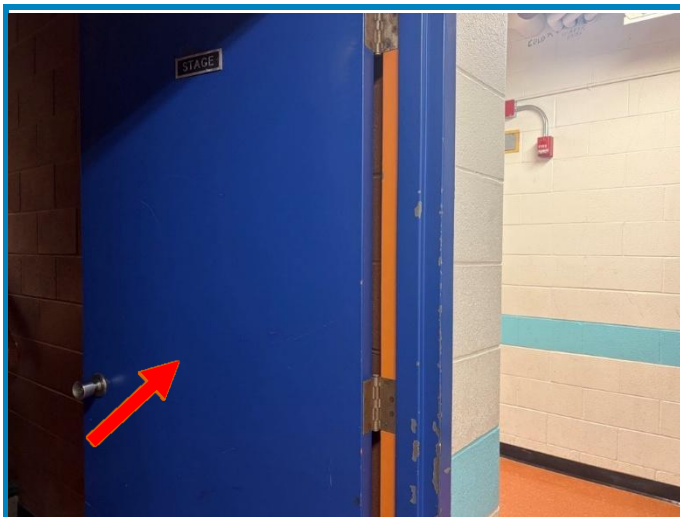


Photo 9: View of the blue paint on metal door within the basement stage area (Loc# 73832) that was determined to contain a lead concentration exceeding the 0.009% limit as outlined in the federal surface coating regulation. Paint of similar colour was also observed on doors in the basement storage room (Loc# 73834) and the 2nd floor entrance vestibule (Loc# 48777).



Photo 10: View of a concrete block (see arrow) with asbestos-containing white block sealant, along with white paint on the concrete wall that was determined to contain a lead concentration exceeding the 0.009% limit as outlined in the federal surface coating regulation, observed within the 2nd floor entrance vestibule (Loc# 48777).



Photo 11: View of the existing exhaust ductwork (see arrow), which is planned to be relocated, appearing uninsulated with no caulking or tar observed in the basement storage room (Loc# 73834).



Photo 12: View of newly applied white caulking on the double door (see arrow), with no secondary layer observed beneath, observed within the 2nd floor entrance vestibule (Loc# 48777).

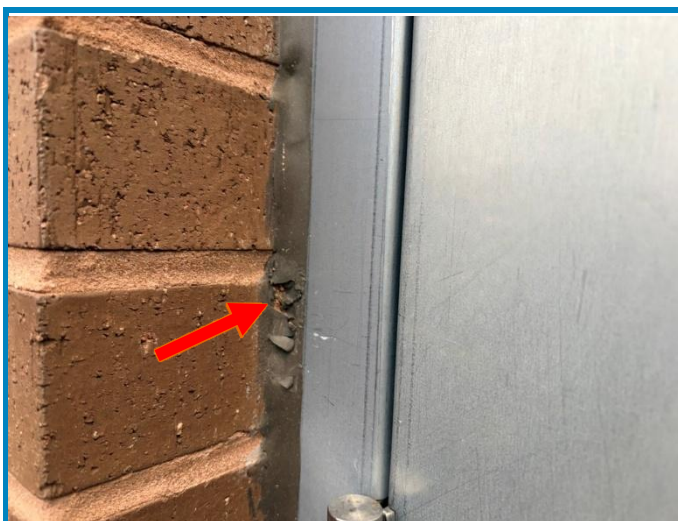


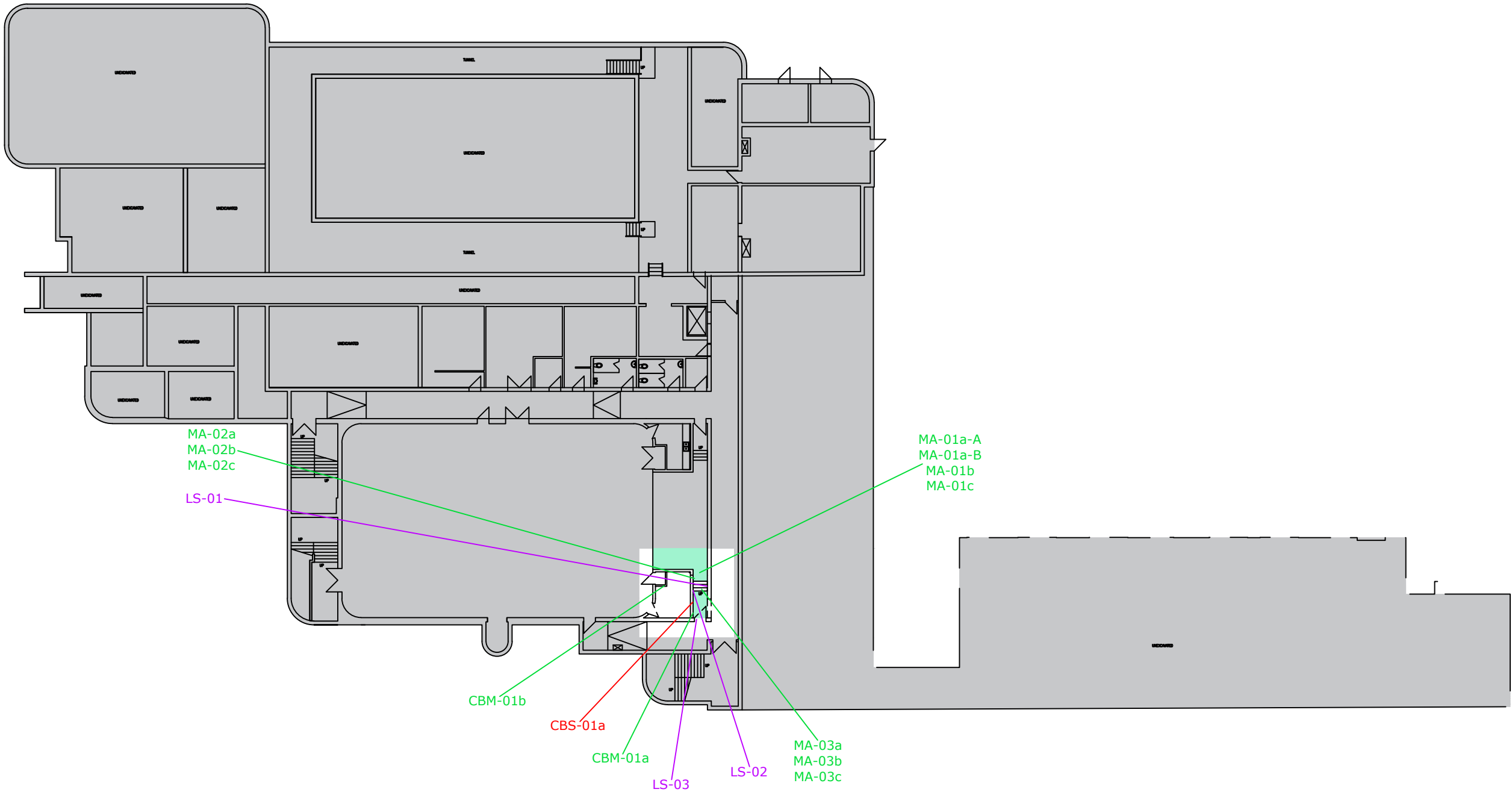
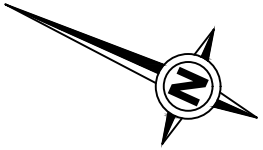
Photo 13: View of newly applied brown caulking on the double door (see arrow), with no secondary layer observed beneath, observed within the 2nd floor entrance vestibule (Loc# 48777).



Photo 14: View of the mercury containing light tubes observed in the basement storage room (Loc# 73834) and the 2nd floor entrance vestibule (Loc# 48777).

APPENDIX C

SITE FIGURES



- LEGEND
- XX-01a NON-ASBESTOS CONTAINING MATERIAL SAMPLE LOCATION
 - XX-01a ASBESTOS CONTAINING MATERIAL SAMPLE LOCATION
 - LS-XX LEAD CONTAINING MATERIAL SAMPLE LOCATION
 - ASBESTOS CONTAINING VINYL FLOOR TILES
 - AREA NOT IN SCOPE OF WORK

THE FOLLOWING ASBESTOS CONTAINING MATERIALS MAY BE PRESENT IN THE ASSESSED AREAS BUT HAVE NOT BEEN HATCHED ON THE DRAWING:

- WHITE CONCRETE BLOCK PRIMER

NOT ALL KNOWN OR SUSPECTED HAZARDOUS BUILDING MATERIALS HAVE BEEN DEPICTED ON THE DRAWING. PLEASE REFER TO THE REPORT AND PREVIOUS REPORTS FOR A COMPLETE LIST OF KNOWN AND SUSPECTED HAZARDOUS BUILDING MATERIALS.

PROJECT NAME:

**DESIGNATED
SUBSTANCES SURVEY
-BASEMENT**

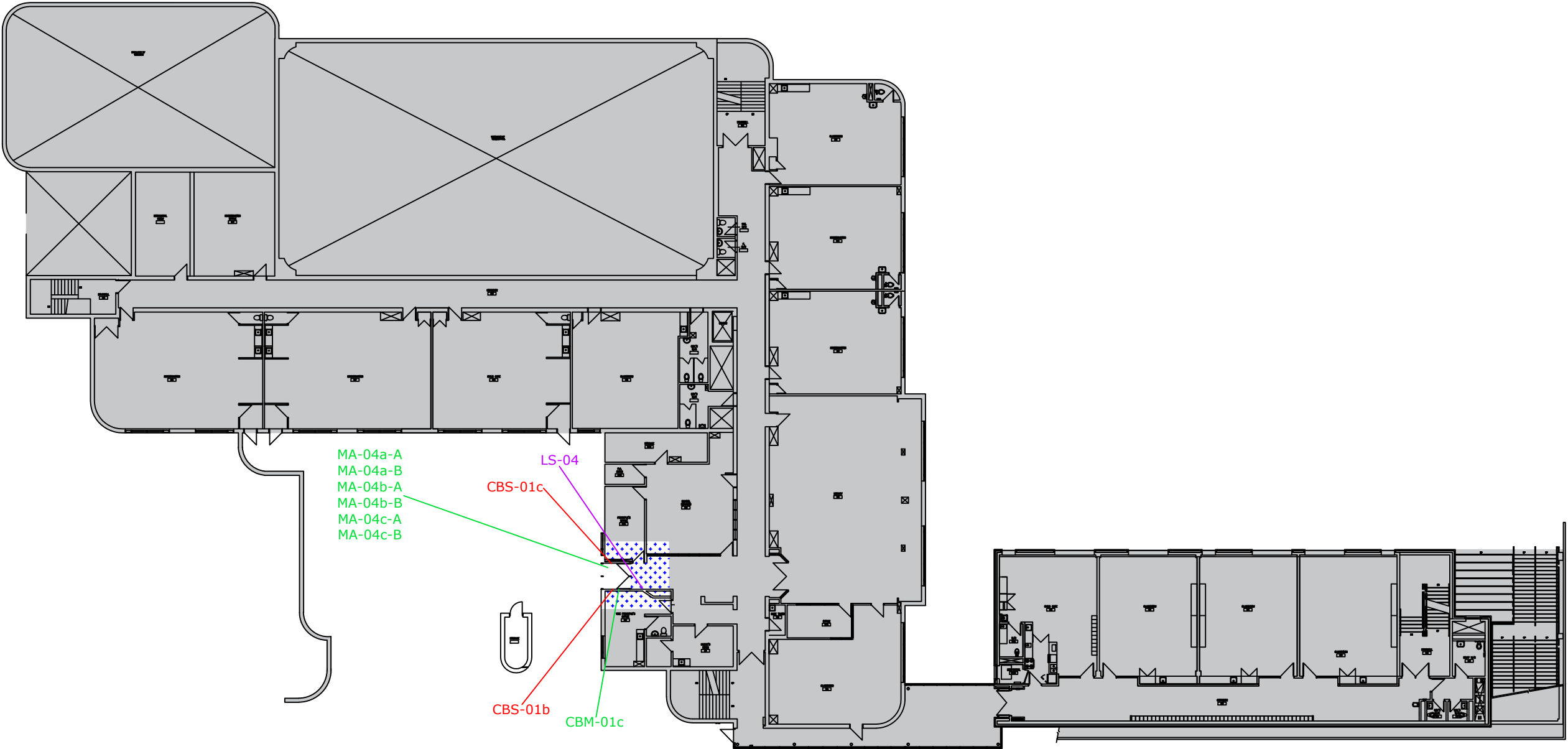
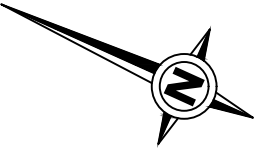
PROJECT ADDRESS:



KEELE STREET
PUBLIC SCHOOL,
99 MOUNTVIEW AVENUE,
TORONTO, ONTARIO

CLIENT NAME AND ADDRESS:

TORONTO DISTRICT
SCHOOL BOARD,
15 OAKBURN CRESCENT,
TORONTO, ONTARIO

PROJECT NUMBER: 32459	DATE: 04.01.2026
DRAWN BY: J.KELBERT	FIGURE: 1
REVIEWED BY: A.MAZAHERI	
SCALE: NTS	



- LEGEND
- XX-01a NON-ASBESTOS CONTAINING MATERIAL SAMPLE LOCATION
 - XX-01a ASBESTOS CONTAINING MATERIAL SAMPLE LOCATION
 - LS-XX LEAD CONTAINING MATERIAL SAMPLE LOCATION
 -  ASBESTOS CONTAINING ACOUSTIC CEILING TILES
 -  AREA NOT IN SCOPE OF WORK

THE FOLLOWING ASBESTOS CONTAINING MATERIALS MAY BE PRESENT IN THE ASSESSED AREAS BUT HAVE NOT BEEN HATCHED ON THE DRAWING:

- WHITE CONCRETE BLOCK PRIMER

NOT ALL KNOWN OR SUSPECTED HAZARDOUS BUILDING MATERIALS HAVE BEEN DEPICTED ON THE DRAWING. PLEASE REFER TO THE REPORT AND PREVIOUS REPORTS FOR A COMPLETE LIST OF KNOWN AND SUSPECTED HAZARDOUS BUILDING MATERIALS.

PROJECT NAME:

**DESIGNATED
SUBSTANCES SURVEY
-SECOND FLOOR**

PROJECT ADDRESS:

KEELE STREET
PUBLIC SCHOOL,
99 MOUNTVIEW AVENUE,
TORONTO, ONTARIO

CLIENT NAME AND ADDRESS:

TORONTO DISTRICT
SCHOOL BOARD,
15 OAKBURN CRESCENT,
TORONTO, ONTARIO

PROJECT NUMBER: 32459	DATE: 04.01.2026
DRAWN BY: J.KELBERT	FIGURE: 2
REVIEWED BY: A.MAZAHERI	
SCALE: NTS	

APPENDIX D

LABORATORY CERTIFICATES OF ANALYSIS

Laboratory Analysis Report

To:

Moya Zhang
RiskCheck Inc.
55 St. Clair Avenue West, Suite 205
Toronto, Ontario
M4V 2Y7

EMC LAB REPORT NUMBER: A132675r*

Job/Project Name: 3605_Keele St PS_DSS

Analysis Method: Polarized Light Microscopy – EPA 600

Date Received: Mar 27/26

Date Analyzed: Apr 6/26

Analyst: Katelyn Stolte

Reviewed By: Malgorzata Sybydlo

Job No: 32459

Number of Samples: 18

Date Reported: Apr 6/26

Client's Sample ID	Lab Sample No.	Description/Location	Sample Appearance	SAMPLE COMPONENTS (%)			
				Asbestos Fibres		Non-asbestos Fibres	Non-fibrous Material
MA 01a	A132675-1 ⁵	Loc#73832 Stage / Stair Landing/ Mastic associated with ACM Vinyl Floor Tiles	2 Phases: a) Brown, mastic b) Light grey, cementitious material	ND			100
MA 01b	A132675-2	Loc#73832 Stage / Stair Landing/ Mastic associated with ACM Vinyl Floor Tiles	Brown, mastic	ND			100
MA 01c	A132675-3	Loc#73832 Stage / Stair Landing/ Mastic associated with ACM Vinyl Floor Tiles	Brown, mastic	ND			100
MA 02a	A132675-4	Loc#73832 Stage /Stair / Mastic associated with baseboard.	Brown, mastic	ND			100
MA 02b	A132675-5	Loc#73832 Stage /Stair / Mastic associated with baseboard.	Brown, mastic	ND			100
MA 02c	A132675-6	Loc#73832 Stage /Stair / Mastic associated with baseboard.	Brown, mastic	ND			100
MA 03a	A132675-7	Loc#73832 Stage / Mastic associated with rubber floor on stair	Brown, mastic	ND			100
MA 03b	A132675-8	Loc#73832 Stage / Mastic associated with rubber floor on stair	Brown, mastic	ND			100
MA 03c	A132675-9	Loc#73832 Stage / Mastic associated with rubber floor on stair	Brown, mastic	ND			100
MA 04a	A132675-10	Loc# 48777 Entrance Vestibule / Mastic associated with baseboard.	2 Phases: a) Yellow, mastic	ND			100

EMC LAB REPORT NUMBER: A132675

Client's Job/Project Name/No.: 32459

Analyst: Katelyn Stolte

Client's Sample ID	Lab Sample No.	Description/Location	Sample Appearance	SAMPLE COMPONENTS (%)			
				Asbestos Fibres		Non-asbestos Fibres	Non-fibrous Material
			b) Grey, cementitious material	ND			100
MA 04b	A132675-11	Loc# 48777 Entrance Vestibule / Mastic associated with baseboard.	2 Phases: a) Yellow, mastic b) Grey, cementitious material	ND ND			100 100
MA 04c	A132675-12 ⁶	Loc# 48777 Entrance Vestibule / Mastic associated with baseboard.	Yellow, mastic	ND			100
CBM 01a	A132675-13 ⁶	Loc#73832 Stage /Stair / Concrete Block Mortar	Grey, cementitious material	ND			100
CBM 01b	A132675-14	Loc#73834 Storage Room / Concrete Block Mortar	Grey, cementitious material	ND			100
CBM 01c	A132675-15 ⁶	Loc#48777 Entrance Vestibule Concrete Block Mortar	Grey, cementitious material	ND			100
CBS 01a	A132675-16	Loc#73832 Stage /Stair / Concrete Block Sealant	White, primer	Chrysotile	0.5		99.5
CBS 01b	A132675-17	Loc# 48777 Entrance Vestibule / Concrete Block Sealant	NA	NA			
CBS 01c	A132675-18	Loc# 48777 Entrance Vestibule / Concrete Block Sealant	NA	NA			

Note:

1. Bulk samples are analyzed using Polarized Light Microscopy (PLM) and dispersion staining techniques. The analytical procedures are in accordance with App. E to Sub. E of 40 CFR Part 763 and EPA/600/R-93/116
 2. The results are only related to the samples analyzed. **ND** = None Detected (no asbestos fibres were observed), **NA** = Not Analyzed (analysis stopped due to a previous positive result).
 3. This report may not be reproduced, except in full without the written approval of EMC Scientific Inc. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.
 4. The Ontario Regulatory Threshold for asbestos is 0.5%. The limit of quantification (LOQ) is 0.5%.
 5. Phase b) is small in size.
 6. Another phase is present but is too small to analyze.
- * Report has been revised as requested on April 6, 2026.

C.O.C.: -

REPORT No: 26-007906 - Rev. 0

Report To:

EMC Scientific Inc.
5800 Ambler Dr. #100
Mississauga, ON L4W 4J4

CADUCEON Environmental Laboratories

2378 Holly Lane
Ottawa, ON K1V 7P1

Attention: Alister Haddad

DATE RECEIVED: 2026-Mar-30
DATE REPORTED: 2026-Apr-01
SAMPLE MATRIX: Paint Chips

CUSTOMER PROJECT: 3605 Keele St. PS DSS
P.O. NUMBER: 32459

Analyses	Qty	Site Analyzed	Authorized	Date Analyzed	Lab Method	Reference Method
ICP/OES (Solid)	4	OTTAWA	NSAUNDERS	2026-Mar-31	D-ICP-02	EPA 6010

R.L. = Reporting Limit

NC = Not Calculated

Test methods may be modified from specified reference method unless indicated by an *

			Parameter
			Lead
			Units
			R.L.
			0.0005
Client I.D.	Sample I.D.	Date Collected	-
LS01 Red on conc wall / loc 73832 stage	26-007906-1	2026-Mar-26	1.13
LS02 Yellow on conc wall / loc 73832 stage	26-007906-2	2026-Mar-26	0.732
LS03 Blue/Orange on metal door / loc 73832	26-007906-3	2026-Mar-26	3.12
LS04 White on conc wall / loc 48777 entrance vest	26-007906-4	2026-Mar-26	0.161



Michelle Dubien
Data Specialist

APPENDIX E

APPLICABLE LEGISLATION, GUIDELINES

ASBESTOS

Ontario Regulation (O. Reg.). 278/05 – *Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations* (as amended by O. Reg. 450/19), stipulates additional requirements regarding materials that are known or suspected to contain asbestos. Under O. Reg. 278/05, Asbestos Containing Materials (ACM) must be identified, documented, and maintained in good condition at a property. ACM must be re-inspected annually to determine the condition of the materials. Prior to any construction or renovation work, a document summarizing the presence of all ACM must be made available to contractors and subcontractors. The regulation applies to all constructors, employers and workers engaged in construction, repair, and maintenance.

According to O. Reg. 278/05, any material that contains 0.5% or more asbestos by dry weight is an ACM.

O. Reg. 278/05 – *Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations* (as amended) governs the disturbance of ACM during construction related projects (e.g., renovation or demolition activities) and is enforceable through the Ontario Ministry of Labour (MOL). O. Reg. 278/05 categorizes all ACM abatements under Type 1, Type 2, Type 3, or glove-bag operations depending on the location, quantity, type, and friability of the ACM that may be disturbed. Each abatement operation is governed under stringent requirements and procedures to appropriately work with and handle known ACM. The MOL must be notified in writing of any project involving Type 3 asbestos abatement.

LEAD

The concentration of lead in surface coating materials (e.g., paint) is controlled by the *Federal Surface Coating Materials Regulation*, SOR/2016-193 made under the Canada Consumer Product Safety Act. This regulation classifies Lead-Containing Paint (LCP) as having a lead content of 0.009% (90 ppm) or greater. Furthermore, the MOL has published guidance documentation regarding the handling of lead on construction projects entitled *Guideline – Lead on Construction Projects* and dated April 2011.

MERCURY

The disposal of common mercury wastes (e.g., thermostats or fluorescent light tubes) is controlled by *General – Waste Management*, R.R.O. 1990, Reg. 347 (as amended by O. Reg. 324/22) made under the *Environmental Protection Act*, R.S.O. 1990.

SILICA

The Ontario MOL has published guidance documentation regarding the handling of silica on construction projects entitled *Guideline – Silica on Construction Projects* and dated April 2011. Although silica is not regulated, the guidance provided in the above noted MOL document is enforceable via the OHSA.

MOULD

Although mould is not explicitly regulated in Ontario; Section 25 of the OHSA places duties on employers to take reasonable precautions to ensure that the health and safety of workers is adequately protected. The Canadian Construction Association's (CCA) *Mould Guidelines for the Canadian Construction Industry* (dated 2018) and the Environmental Abatement Council of Canada's (EACC) *Mould Abatement Guidelines Edition 3*, (2015) are generally utilized during the waste management, remediation measures, and transfer of mould impacted building materials.

WASTE DISPOSAL

General – Waste Management, R.R.O. 1990, Reg. 347 (as amended) made under the *Environmental Protection Act*, R.S.O. 1990, is the applicable regulation encompassing hazardous waste management in Ontario. This regulation also includes various requirements such as hazardous waste registration, manifests, storage, transport, and record keeping.

APPENDIX F

PROJECT METHODOLOGY

GENERAL

RiskCheck conducts a room-by-room evaluation (e.g., building common areas, tenant areas, mechanical rooms, building exterior, etc.) to identify potential hazardous building materials as defined by the scope of work. All work is conducted in accordance with RiskCheck internal Standard Operating Procedures.

During the fieldwork, the RiskCheck representative takes detailed notes via a standardized checklist form (tailored specifically for this project) along with photographs as required, to document the presence and condition of potential hazardous building materials identified at the accessibility project work locations.

RiskCheck reviews previous environmental reports (including previous assessments, drawings, abatement reports, etc.) pertaining to the accessibility project work locations, provided to RiskCheck by the Client. Existing sampling data is relied upon where it complies with the requirements of Ontario Regulation (O. Reg.) 278/05 – *Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations* (as amended by O. Reg. 450/19).

LIMITATIONS OF PROJECT SCOPE OF WORK

The scope of work for this project is limited to the terms and limitations outlined within the proposal for this project.

ASBESTOS

Asbestos is a general name for several varieties of highly fibrous naturally occurring minerals. Commercially significant types include Chrysotile, Amosite, and Crocidolite. Asbestos is a naturally occurring mineral that was widely manufactured into products for home and industrial applications due to its physical and chemical properties (e.g., thermal, chemical, and electrical resistance, flexibility, and strength). Asbestos presents a health risk when it is inhaled and has been associated to various respiratory diseases.

It should be noted that the general use of friable (breakable by hand) ACM (including pipe insulation, boiler/tank insulation and spray applied fireproofing) in construction applications generally ceased in the mid to late 1970s. However, some building materials with asbestos content are recognized to exist in buildings constructed as late as 1986. In addition, it should be noted that asbestos is still utilized in the development of some non-friable materials including asbestos containing cement products (e.g., Transite rainwater leaders and Transite panels). Therefore, RiskCheck utilized valuable information including the accessibility project work locations construction date and known renovation areas/periods to determine the sampling strategy for the site.

Representative sample locations of potential ACM were identified based on determining the reported age of the accessibility project work locations and specific renovation time periods and locations within the accessibility project work locations and associated components, if available. Suspect ACM bulk samples were obtained in compliance with the requirements of O. Reg. 278/05, which states a minimum number of samples are to be obtained and analyzed (1, 3, 5, or 7 depending on quantity, application, and friability)

from each area of homogeneous material for the material to be considered non-asbestos. This protocol is further outlined in the table below.

A homogeneous sampling area is defined by the United States Environmental Protection Agency (USEPA) as containing material that is uniform in texture and appearance, was installed at one time and is unlikely to consist of more than one type or formulation of material. The surveyor used information obtained on site by visual examination, available information on the phases of the construction and information on renovations to the accessibility project work locations obtained from the Client to determine the extent of each homogeneous area and the number of samples required.

**ASBESTOS BULK MATERIAL SAMPLING REQUIREMENTS
(ADOPTED FROM O. REG. 278/05 (AS AMENDED))**

Item	Type of material	Size of area of homogeneous material	Minimum number of bulk samples to be collected
1.	Surfacing material, including without limitation material that is applied to surfaces by spraying, by troweling or otherwise, such as acoustical plaster on ceilings and fireproofing materials on structural members	Less than 90 m ²	3
		90 or more m ² , but less than 450 m ²	5
		450 or more m ²	7
2.	Thermal insulation, except as described in item 3 (O. Reg. 278/05)	Any size	3
3.	Thermal insulation patch	Less than 2 linear m or 0.5 m ²	1
4.	Other material	Any size	3

Asbestos-cement products such as exterior siding/panels/soffits and piping for rainwater leaders generally referred to as Transite are identifiable through visual observation by an experienced and trained individual. Transite materials are challenging to sample because of their tendency to easily break into pieces or cause unnecessary damage to a building material. In addition, sampling of rainwater leader may result in significant damage to the accessibility project work locations. Therefore, Transite materials identified in the visually accessible areas of the accessibility project work locations are quantified and “presumed to contain asbestos” only.

Areas above accessible suspended ceiling systems were observed by removing ceiling tiles. Drywall or plaster ceiling or wall spaces were accessed via existing access panels only. Further information was obtained through review of design drawings, system schematic drawings and consultations about the building history with maintenance and service staff, where available. Quantities of suspect ACM have been estimated by site observation.

The suspect bulk ACM samples were obtained using appropriate wetting techniques (where applicable) and sampling tools, placed in sealable plastic bags, labelled, and couriered to an analytical laboratory under Chain-of-Custody protocol for laboratory analysis of type and percentage of asbestos.

POTENTIAL FOR ASBESTOS-CONTAINING MATERIALS IN INACCESSIBLE AREAS

Due to the limited intrusive nature of the assessment, concealed ACM is potentially present under multiple layers of floor, wall, or ceiling finishes; under heavy or fixed objects (e.g., safes, HVAC units, cabinets, shelves, etc.); inside void spaces (e.g., pipe chases, fire barriers, etc.); or in areas of low visual accessibility (e.g., limited wall or ceiling hatches in solid finishes).

Sampling of materials suspected to contain asbestos was limited to those materials where sampling would not produce a risk to building occupants, where it would not be destructive to the function of the material, and where it would not be aesthetically damaging.

Ceiling spaces/areas above accessible suspended ceiling systems (e.g., reachable using a 6-foot step ladder) were inspected by removing ceiling tiles (where possible). The wall and ceiling cavities associated with drywall, plaster and other fixed systems were accessed via existing access panels (where possible). It should be noted that only those areas and building materials accessible from a 6-foot step ladder were inspected and sampled during the site visit.

Furthermore, the materials listed below are generally excluded during an assessment due to the potential for irreparable damage to the building components from sampling and due to accessibility issues. The presence of asbestos is presumed in the materials noted below.

- Components or wiring within motors or lights
- Exterior cladding, soffit and fascia boards on building
- Mechanical packing, ropes and gaskets
- Vermiculite above solid ceilings, inside masonry or other wall assemblies
- Concrete levelling compound (for floors)
- Fire-door cores
- Refractory brick in boilers or incinerators
- Asbestos cement (Transite) pipe and panels
- Dust in ductwork
- High voltage wiring
- Underground services or piping
- Roofing materials

Where present in the accessibility project work locations, the above-listed items should be presumed to contain asbestos until proven otherwise by bulk sampling and laboratory analysis.

ASBESTOS CONTAINING MATERIAL EVALUATION CRITERIA

The condition of confirmed and suspect ACM as well as the potential of disturbance of the ACM was evaluated throughout the DSS. These evaluations were based on the interpretations of published studies, existing asbestos regulations, and RiskCheck's experience involving buildings that contain friable ACM.

An ACM is considered damaged if it is sprayed material that is delaminating, mechanical insulation with damaged/missing insulation or jacketing, exposed under pad on vinyl sheet flooring, a non-friable material that has been pulverized which causes it to become friable, etc. The precedence for remedial action is based not solely on the evaluation of condition but is also based on several other factors which include:

- Accessibility or potential for direct contact and disturbance which can cause release of asbestos to the air;
- Practicality of repair (for example will damage to the ACM continue even if it is repaired); and
- Efficiency of the work (for example if a damaged ACM is to be removed in an area, it may be most practical to remove all ACM in the area even if it is in good condition).

CLASSIFICATION OF FRIABLE AND NON-FRIABLE ASBESTOS MATERIAL

ACM are divided into two comprehensive categories, friable and non-friable. The primary difference between these two categories relates to how easily the material can be broken down to release airborne fibres. As part of this DSS, confirmed and presumed ACM identified in the accessibility project work locations were evaluated based on its friability. Buildings constructed post 1990s were not suspected to contain friable ACM. The criteria used to assess the friability of a material are summarized in the table below.

Friability Type	Description of Friability
Friable	Are materials that when dry, can be crumbled, pulverized, or reduced to a powder by hand or moderate pressure. ACM that are friable have a much greater potential than non-friable ACM to release airborne asbestos fibres when disturbed. The most common friable ACM used in the past are surfacing materials (usually sprayed fireproofing, texture, decorative or acoustic plaster) and thermal insulations on mechanical systems.
Non-Friable	Are materials that when dry, cannot easily be crumbled, pulverized, or reduced to a powder by hand or moderate pressure. The most common non-friable materials include vinyl floor tiles, gasket materials, Transite rainwater leader or panel, caulking tars and adhesive mastics.

CONDITION OF MATERIAL (CONFIRMED OR PRESUMED ACM)

As part of this DSS, confirmed and presumed ACM identified in the accessibility project work locations were also evaluated based on its condition. The criteria used to assess the condition of a material are summarized in the table below.

Condition Rating	Description of Material Condition
Good	<u>Mechanical Insulation:</u> Insulation on fittings, tanks, valves, boilers, ducts, and other mechanical equipment, which is completely enclosed (e.g., no ACM insulation is exposed).
	<u>Spray or Trowel-Applied Material:</u> Sprayed fireproofing or texture coat showing no signs of delaminating or fall-out.
	<u>Non-Friable Material:</u> Non-friable materials not exhibiting significant damage or extensive wear.

Condition Rating	Description of Material Condition
Fair	Mechanical Insulation: Pipe insulation showing some signs of physical damage or shrinkage cracks along pipe runs, or undamaged insulation that is not covered.
	Non-Friable Material: Materials that show signs of physical deterioration (e.g., worn down) or breakage (e.g., cracks) but remain non-friable.
Poor (Damaged)	Mechanical Insulation: General damage to mechanical insulation or water damage exposing asbestos directly. The absence of jacketing (e.g., canvas wrap, foil tape) around mechanical insulation.
	Spray or Trowel-Applied Material: In areas of sprayed fireproofing or texture coat: delaminating and the presence of fallen material on horizontal surfaces.
	Non-Friable Material: Non-friable ACM severely damaged to the extent that asbestos fibres may be released.

ACCESSIBILITY OF MATERIAL

ACM are evaluated based on the ease of which they can be reached and physically disturbed. The accessibility of ACM is rated according to the criteria presented below in the following table which defines the various classifications of accessibility (e.g., Low, Moderate, High) that were utilized during the DSS:

Accessibility Rating	Description of Material Accessibility
Access (A)	Accessible to all occupants of the subject building to approximately 2.5 metres (arms-reach) above floor level. Includes specific areas where occupant activities may disturb material that is not normally within reach (e.g., sports in gymnasiums and lifting in warehouses).
Access (B)	Areas of the subject building restricted to operations and maintenance staff and accessible to approximately 2.5 metres (arms-reach) above floor level.
Access (C ₁) Visible	Visible from floor level and accessible only with a ladder or other elevating device.
Access (C ₂) Concealed	Concealed from floor level and accessible only with a ladder or other elevating device and by moving a non-fixed building component (e.g., ceiling tile or access hatch).
Access (D)	Not accessible without demolition or removal of fixed building components or building system.
Access (A _A – D _A)	Areas with air movement inside of an air plenum or with air flow directed at ACM.

ACTION RESPONSE LEVELS

Confirmed or presumed ACM identified in the accessibility project work locations are assigned a specific response action level which is based on the condition and accessibility rating. These actions levels are based on a spectrum of risk from poor condition materials that are readily accessible posing the utmost risk to good condition materials in inaccessible areas posing the least risk. Response actions levels range from immediate clean-up of friable ACM and debris to ongoing routine inspections of non-friable material in good condition.

Action levels are provided for compliance and management of the known (confirmed or presumed) or suspect ACM within a building. The following table defines the various actions levels to appropriately work with confirmed or presumed ACM.

Action Level Ratings	Description of Action Levels
Action Level (1)	Action dealing with the immediate cleanup of ACM debris likely to be disturbed.
Action Level (2)	Action dealing with Type 2 isolation of an area and performing asbestos removal for regulatory compliance.
Action Level (3)	Action dealing with Type 2 asbestos procedures for ceiling entry where friable ACM debris is present on the top side of a ceiling system.
Action Level (4)	Action dealing with the removal of asbestos that goes beyond compliance but simplifies the asbestos management.
Action Level (5)	Action dealing with the repair of asbestos.
Action Level (6)	Action dealing with ACM surveillance requirements of the regulation.

ACTION RESPONSE LEVELS MATRIX

Based on a thorough review and consideration of the ACM evaluation ratings presented above (e.g., accessibility, condition, and action response levels), RiskCheck has provided the following Action Response Level Matrix to be utilized as a guide for operational procedures when working with ACM.

The following table outlines suitable actions for confirmed or presumed ACM identified in the accessibility project work locations.

Accessibility Rating	Condition of Material			ACM Debris
	Good	Fair	Poor (Damaged)	
Access (A)	Action Level (6)	Action Level (5)	Action Level (1)	Action Level (1)
Access (B)	Action Level (6)	Action Level (5)	Action Level (2)	Action Level (1)
Access (C ₁) Visible	Action Level (6)	Action Level (5)	Action Level (2)	Action Level (1)
Access (C ₂) Concealed	Action Level (6)	Action Level (5)	Action Level (3)	Action Level (3)
Access (D)	Action Level (6)	Action Level (4)	Action Level (4)	Action Level (2)
Access (All) with Air Movement	Action Level (6)	Action Level (5)	Action Level (2)	Action Level (1)

Low Risk
 Moderate Risk
 High Risk

LEAD

Lead is a soft metallic element that is stable, ductile, and resistant to corrosion. It has historical widespread use in building materials because it is easy to extract/smelt and is highly malleable. Lead was commonly added to paint as a pigment, and to increase durability, resist corrosion and increase pliability. Lead can pose a health risk to humans if ingested or inhaled.

Samples of distinctive paint finishes, and surface coatings present in more than a limited application, where removal of the paint is possible are collected. The samples are collected by scraping the painted finish to include base and covering applications.

Representative samples of suspect Lead Containing Paint (LCP) are obtained and submitted to an AIHA or NVLAP accredited laboratory for analysis for analysis of lead paint content by Flame Atomic Absorption Spectroscopy EPA SW-846 3rd Ed. Method No. 3050B/Method No. 7420 or Inductively Coupled Plasma Atomic Emission Spectrometry EPA SW-846 3rd Ed. Method No. 6010C.

For this report, all paints containing lead at a concentration of 0.009% (90 ppm) or greater are considered lead containing paints. The condition of paint and surface coatings are evaluated for condition such as flaking, chipping, or delaminating.

Other lead building products (e.g., wiring connections, wire bundles, plumbing solder, roof flashing, batteries, noise baffles, cast iron piping gaskets (e.g., bell & spigots), and as radiation shielding in the walls of medical/dental tenants) are identified by visual observation only.

MERCURY

Building materials known to contain mercury (e.g., thermostats, pressure gauges, fluorescent light tubes, dental amalgam separators, batteries, etc.) is identified by visual inspection only. Dismantling of equipment suspected of containing mercury is not performed. RiskCheck does not perform sampling of these materials for laboratory analysis of mercury content.

SILICA

Building materials known to contain crystalline silica (e.g., concrete, cement, tile, brick, masonry, mortar, etc.) is identified by visual inspection only. RiskCheck does not perform sampling of these materials for laboratory analysis of crystalline silica content.

ACRYLONITRILE

Acrylonitrile is utilized in the production of rubber and polymers. It is also used to make other chemicals such as plastics, synthetic rubber, and acrylic fibres for clothing, blankets, carpeting and rugged plastics for computer and TV housings. It is also used in the manufacture of automotive parts and gaskets.

Acrylonitrile is released into the environment by the chemical and plastic products industries. Occupational exposure to acrylonitrile occurs during production and its use in the manufacture of other

products. Since 1972, acrylonitrile has not been produced in Canada; however, a small portion is still imported.

ARSENIC

Arsenic compounds are utilized in pigments, glass making, animal poisons, insecticides, paints, wallpaper, pyrotechnics and ceramics. Arsenic is also added to germanium in the production of semiconductor devices such as integrated circuits and transistors. Arsenic is naturally found in the environment and is widely distributed throughout the earth's crust. The combustion of fossil fuels, mining and the disposal of domestic and industrial waste is a source of arsenic poisoning in the environment.

BENZENE

Benzene is a flammable, clear, colourless, sweet-smelling liquid used in the production of plastics, paints, rubber, resins, detergents, lubricants, drugs, pesticides, and synthetic fabrics. It can be found in crude oil, cigarette smoke, and many petroleum hydrocarbons (e.g., gasoline).

COKE OVEN EMISSIONS

Coke oven emissions are complex mixtures of coal and coke particles, various vapours, gases, and tars that include various substances including, benzene, naphthylamine, cadmium, arsenic, beryllium, and chromium.

The primary use of coke (pure carbon) is in the extraction of metals from their ores, especially for the manufacture of iron and steel. Coke is also used to synthesize calcium carbide and to manufacture graphite and electrodes. Chemicals recovered from coke oven emissions are used to produce plastics, solvents, dyes, drugs, waterproofing, paints, pipe coating, roads, roofing, insulation, and as pesticides and sealants.

ETHYLENE OXIDE

Ethylene Oxide is utilized in the production of various chemicals including textiles, detergents, polyurethane foam, antifreeze, solvents, medicinal products, adhesives, and other related products. Ethylene Oxide is also used as a fumigant in certain agricultural products and as a sterilizing agent for food (spices), cosmetics, medical equipment's, as well as for the sterilization of surgical tool and plastic devices in hospitals that cannot be sterilized by steam.

ISOCYANATES

Isocyanates are a cluster of low molecular weight aromatic and aliphatic compounds containing the isocyanate group (-NCO). They are utilized in the production of polyurethane products. It is also used to produce flexible and rigid foams, fibres, paints and varnishes, and elastomers. Di isocyanates are used in the automobile industry, auto body repair and building insulation materials.

Trades that may involve production or exposure to isocyanates may include painting, foam-blowing, and the production of various products including chemicals, polyurethane foam, insulation materials, surface coatings, car seats, furniture, foam mattresses, under-carpet padding, packaging materials, shoes, laminated fabrics, polyurethane rubber, adhesives, and other polyurethane products.

VINYL CHLORIDE

Vinyl chloride is utilized in the production of polyvinyl chloride (PVC), a plastic resin for many consumer or industrial products, wrapping film, flooring, windows, compact discs, credit cards, latex paints, and vinyl siding for homes. PVC is also used to make pipes, wire and cable coatings, medical supplies, industrial and household equipment, furniture, and automobile upholstery.

VISIBLE MOULD

The presence of mould is determined by visual inspection of exposed building surfaces. If any mould growth is concealed within building cavities it is not addressed in this assessment. RiskCheck does not perform sampling of these materials for laboratory analysis of suspect mould growth and will make a recommendation for a mould assessment if extensive suspect mould growth is observed.

APPENDIX G

LIMITATIONS, TERMS AND CONDITIONS OF RETAINER

RISKCHECK INC.
LIMITATIONS, TERMS AND CONDITIONS OF RETAINER

1. **Our Standard of Care** - RiskCheck Inc. (RiskCheck) will conduct/has conducted the work as specified in the scope of work, contained in the RiskCheck proposal and/or the engagement letter, and perform/performed the environmental investigations requested by the Client according to the standards of a reasonable environmental consultant ("Retainer"). Any work performed by RiskCheck is conducted in accordance with generally accepted engineering or scientific or environmental practices current in the location and at the time the work is performed. No other warranty, expressed or implied is made.
2. **Our Sources of Information** - RiskCheck will/has sought to obtain relevant information, statements, documents and analytical test results concerning the subject property from our Client, third party sources, government or regulatory publications, databases and officials, and other persons to the extent covered by our Retainer. The accuracy of the findings, opinions and conclusions expressed in the RiskCheck report and/or any deliverables ("Deliverables") are subject to any errors or omissions in, or refusals to provide, information. RiskCheck shall not be responsible for any deficiency, misstatement, or inaccuracy contained in the Deliverables as a result of relying on the above information or lack thereof.
3. **Site Inspections** - RiskCheck will complete/has completed the inspection(s) of the subject property in the manner covered by our Retainer. The purpose of our inspection is to identify obvious visible evidence of potential and/or actual sources of environmental contamination and patent irregularities in waste management practices at the subject property. Our findings during the site inspection(s) are subject to any restrictions placed upon our free access to all aspects of the subject property, and neighbouring properties, including but not limited to snow coverage and material storage. A reasonable site inspection may not identify latent or hidden contamination, evidence of potential environmental concerns or irregularities.
4. **Sample and Testing Procedures** - The sample and testing procedures described in the Deliverables, are performed at specific point locations, by experienced personnel using equipment and techniques appropriate for our Retainer. Based upon available data, RiskCheck provides expressed opinion as to the conditions, which may exist between the points investigated, and is based on the location and time of sample collection, and the type of media and parameters analyzed. As actual conditions may vary significantly between sample or test points, and with time, our Client assumes the inherent risk that some conditions may not be detected. RiskCheck shall not be responsible for any cross-contamination resulting from subsurface investigations.
5. **Legal Issues** - The Deliverables are intended to direct our Client's attention to potential and/or actual sources of environmental contamination, including but not limited to, irregular waste management practices at the subject property. Nothing in the Deliverables are intended to express any legal opinion upon environmental liabilities relating to the subject property or whether site operations legally conform with relevant legislative requirements. RiskCheck makes no other representations or warranties whatsoever, including those concerning the legal significance of our findings, or as to other legal matters noted in the Deliverables, including but not limited to, ownership of any property, or the application of any law, to the facts set forth herein.
6. **Confidentiality of Client Information** – RiskCheck agrees to hold all information obtained in the course of our Retainer and the contents of the Deliverables in strict confidence, except where disclosure is directed by our Client's expressed written consent with instructions, or by compulsion of law.

7. **Working Information/Documents** – The Deliverables shall be the property of RiskCheck's Client. All other data, sample and test results, working sheets, draft reports or other papers, documents, information or records prepared or collected by us in the course of our Retainer, shall remain the property of RiskCheck Inc. and/or successors. Our Client agrees that we shall be entitled to retain a copy of the Deliverables for RiskCheck's own files.
8. **Use of the Deliverables** – The information and opinions expressed in the Deliverables are prepared for the sole benefit of our Client. No other party may use or rely upon the Deliverables, or any portion thereof, without the express written consent of RiskCheck Inc. and/or successors. We accept no responsibility for the accuracy of the Deliverables to other parties. We give no warranty, representation, or assurance to other parties, that the findings, statements, opinions or conclusions expressed in the Deliverables are accurate or valid. RiskCheck, at its discretion, will consent to any reasonable request by our Client to approve the use of the Deliverables by other parties as "Approved Users" within one year from the date of the Deliverables.
9. **Copyright** – RiskCheck owns copyright of the Deliverables. We authorize our Client and "Approved Users" to make copies of the Deliverables only in such quantities as are reasonably necessary for its use by those parties. Our Client and Approved Users may not give, lend, sell, or otherwise make available our Deliverables, or any portion or copy thereof, to any party, without our express written consent. No person may alter or modify the Deliverables.
10. **Personal Liability** – The Client and/or "Approved User" expressly agrees that RiskCheck employees shall have no personal liability to the Client and/or "Approved User" with respect to a claim, whether in contract, tort and/or any other cause of action in law. Furthermore, the Client and/or "Approved User" agrees that it will bring no proceedings, nor take any action in any court of law, against RiskCheck employees in their personal capacity.
11. **Professional Liability** – RiskCheck will not be responsible for any consequential or indirect losses incurred by the Client and/or "Approved Users", including but not limited to, loss of income, business opportunities, business interruptions, personal injury or death.
12. **Subconsultant and Contractor Liability** – RiskCheck on certain investigations/assessments (including but not limited to subsurface investigations, laboratory services, remediation, risk assessments, abatements) will require hiring the services of individuals and companies with special expertise and/or services, which are not provided by RiskCheck. RiskCheck may retain these services on behalf of the Client, as part of the overall project, as a convenience to the Client. RiskCheck shall not be responsible for errors, omissions or negligence by those parties in carrying out their work. These will be the responsibility of the subconsultant and contractors retained for completion of the project. The Client indemnifies RiskCheck from all such claims associated with the work carried out by subconsultant and contractors.