Technical Memorandum

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To:	Simcoe Muskoka Catholic District School Board
From:	Fernando Contento, P.Geo., QPesa
Date:	May 25, 2026
Re:	Salt Impacted Excess Soil Management Notre Dame Catholic School
Project No.	2503918

This Memorandum presents the reporting requirements, procedures and measures that must be undertaken when managing salt impacted excess soil ensuring compliance with the applicable O.Reg.406/19 requirements. This Memo provides guidance for excess soil management associated with the removal of salt impacted soils that is intended to reduce or eliminate the potential for future risk to the environment during soil import and/or export.

Salt Impacted Soil Disposal

It is noted that the laboratory chemical analysis of twelve (12) out of forty-five (45) samples indicated elevated EC and/or SAR concentrations above the MECP Table 2 RPI Site Condition Standards for reuse on-Site. Furthermore, the same twelve (12) samples at six (6) borehole locations (BH2, BH5, BH6, BH11, BH13, and BH15) exceeded the MECP Table 2.1 RPI and 3.1 RPI Excess Soil Quality Standards (ESQS) and three (3) samples at three (3) borehole locations (BH2, BH6, and BH16) exceeded the MECP Table 2.1 ICC and 3.1 ICC ESQS for export consideration. As such, the excess soil generated at these locations are designated as waste and should be exported to a Class 1 Soil Management, Local Waste Transfer, or Landfill Facility. The Contractor is to assume the extent of EC/SAR (salt related) impacts extends to the nearest borehole without EC/SAR exceedances per the mapping appended to this memorandum.

Salt Impacted Soil Reuse Off-Site

Should excess soils be exported to a Receiving Site capable of accepting EC/SAR (salt impacted) excess soils for reuse, written authorization from the Receiving Site Owner/Authorized representative must be provided prior to export of the salt impacted excess soil, accepting the fact that the soil is salt impacted and acknowledging that final placement is being carried out in accordance with O.Reg. 406/19 and in accordance with Section D, subsection 1 (2) of the Excess Soil Rules as per the below:

"(2) Salt-Impacted Excess Soil

1. *For the purposes of paragraph 6 of subsection 5 (1), subsection 5 (8), paragraph 5 of subsection 5.5(1), sub-paragraph 2.i. of subsection 5.7 (1), and sub-paragraph 2.i. of subsection 5.7(2) of the regulation and deemed compliance with excess soil quality standards as set out in paragraph 1 of subsection 1 (10.1) of Section A in Part II, salt-impacted excess soil, including salt-impacted excess soil that is part of recycled engineered aggregate, shall be placed in accordance with the following:*
    a. *Salt-impacted excess soil may be placed in any area of the reuse site where it is anticipated*

a substance will be applied for the safety of vehicular or pedestrian traffic under conditions of snow or ice.

b. *Salt-impacted excess soil may be placed at any reuse site used for an industrial or commercial property use.*

c. *In respect of a reuse site used for a community, parkland, institutional, or residential use,*

   i. *salt-impacted excess soil may be placed at a depth of at least 1.5 metres below the soil surface, or*

   ii. *if subparagraph i does not apply, it must be finally placed in accordance with a landscape plan described in subsection 5(8) of the regulation that meets the requirements set out in paragraph 3.*

d. *In respect of a reuse site used for an agricultural or other property use,*

   i. *salt-impacted excess soil may be finally placed at a depth of at least 1.5 metres below the soil surface, or*

   ii. *if subparagraph i does not apply, in areas that will not be vegetated and only to achieve a grade necessary to construct a planned building, including a barn or greenhouse, or install a driveway or parking area.*

2. *Despite paragraph 1, in all cases, salt-impacted excess soil shall not be finally placed at any of the following areas of a reuse site:*

   a. *within 30 metres of a waterbody;*

   b. *within 100 metres of a potable water well or, with respect to an approved lot that may require a potable water well, within 100 metres of the planned water well location or if the location of the well is unknown, the centre of the lot ; or,*

   c. *an area that will be used for growing crops or pasturing livestock unless the salt-impacted excess soil is placed 1.5 metres or greater below the soil surface.*

3. *A landscape plan for the purposes of subsection 5(8) of the regulation and subclause 1.c)(ii) shall:*

   A. *Identify the areas within the reuse site in which salt-impacted excess soil can be finally placed, which shall include only the following:*

      a. *An area that will be unvegetated and that is not an area of the reuse site described in paragraph 2.*

      b. *An area that is not an area described in paragraph 2 and that will be vegetated with vegetation that,*

         i. *may tolerate elevated levels of chemicals associated with salt impacted excess soil, or*

         ii. *requires less than 1.5 metres of soil that meets applicable excess soil quality standards to grow successfully.*

   B. *Identify, for each area mentioned in subparagraph A.b):*

      a. *The types of vegetation that may be planted in that area,*

      b. *The acceptable levels of salt-related contaminants that may be tolerated by the vegetation mentioned in subparagraph A.b)i, if applicable, and*

c. The depth of soil that must meet the applicable excess soil quality standards in order for the vegetation mentioned in subparagraph A.b) ii to grow successfully, if applicable.

C. Be signed by a person with qualifications as set out in subsection 5(10) of the regulation."

Standard Limitations and Disclaimer

This report was prepared exclusively for the use of Simcoe Muskoka Catholic District School Board. The findings and conclusions, if any provided by GEI in this report, are based solely on the information reported to GEI as of the date of this report. Future investigations or additional information not provided to GEI at the time of this report may result in modification of this report. GEI's scope of work did not include verifying the completeness or accuracy of information provided by others. Accordingly, GEI shall not be liable for any damages, costs, or other consequences resulting from reliance on such information if it is later determined to be inaccurate or incomplete. GEI's professional services for this project have been performed in a manner consistent with that degree of skill and care ordinarily exercised by members of the same profession currently practicing in the same locality, performing similar services under similar conditions. GEI makes no other representations and no warranties, express or implied.

Sincerely,

GEI Consultants Canada Ltd.

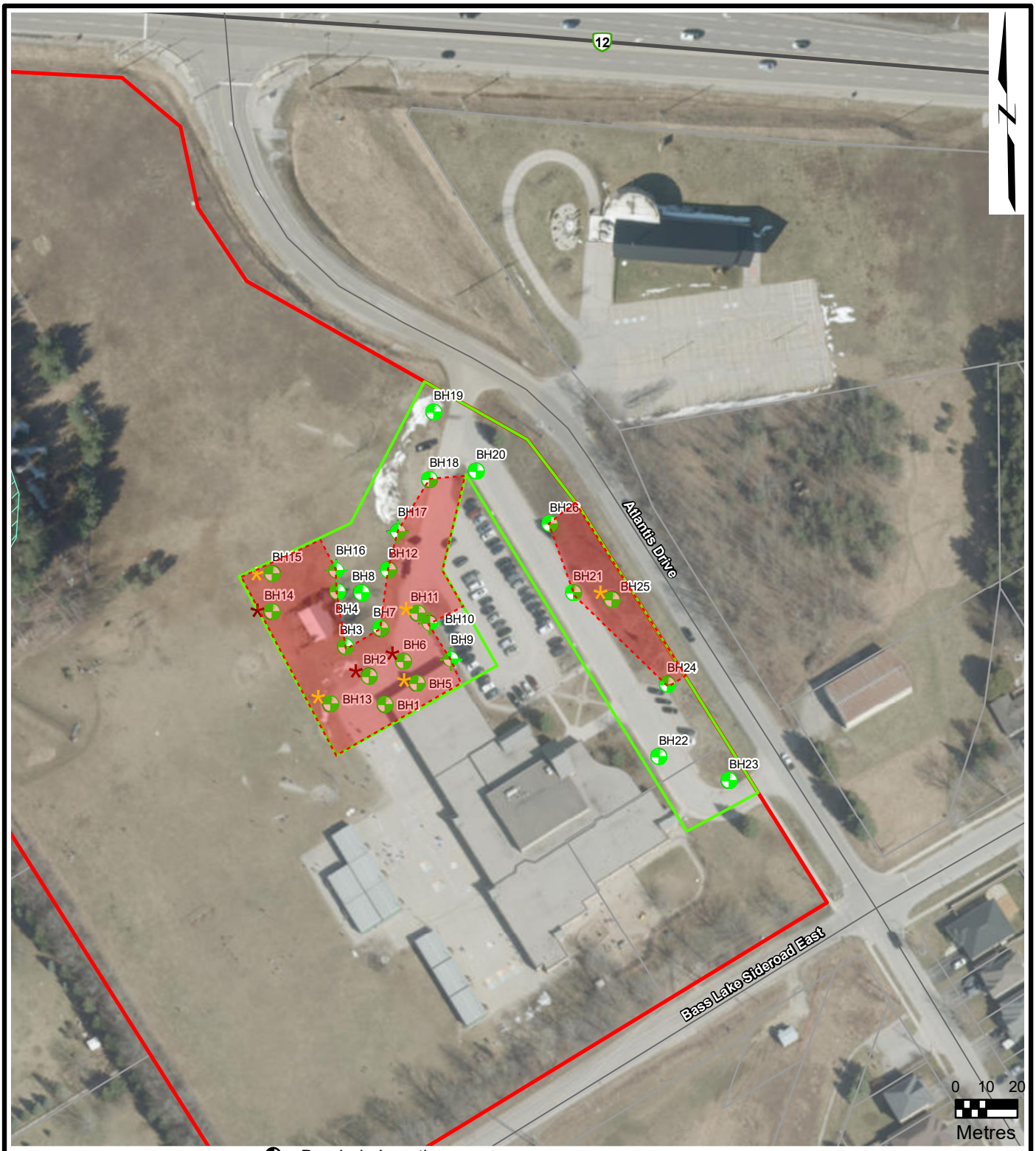


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Appendices

Appendix A Extent of Salt Impacted Soils

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Project Area Boundary
SCR Boundary
Highway
Road
Wetland - Not evaluated per OWES

Borehole Location
Borehole/Monitoring Well Location
Meets Table 2.1 AO ESQS
Meets Table 2.1 RPI ESQS
Meets Table 2.1 ICC ESQS
Meets Table 3.1 RPI ESQS

Meets Table 3.1 ICC ESQS
Exceeds Table 3.1 ICC ESQS
EC/SAR
Extent of EC/SAR Salt Impacts

Reference(s):
1. Coordinate System: NAD 1983 CSRS UTM Zone 17N.
2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © King's Printer for Ontario, 2025.
3. Orthoimagery © County of Simcoe, 2025. Imagery taken in 2024.

Soil Characterization Report
Proposed Addition to the Notre Dame Catholic School
140 Atlantis Dr., Orillia, ON

Simcoe Muskoka Catholic District School Board

GEI Consultants Canada

EXCESS SOIL SUMMARY FOR EXPORT

Project 2503918 | September 2025 | Fig. 5