



30 Forensic Engineering

Vancouver	(604) 674-1100
Calgary	(403) 208-4545
Toronto	(416) 368-1700
Ottawa	(613) 903-6900

30fe.com

City of Mississauga
Planning and Building Department
Development and Design Division
300 City Centre Drive, 6th Floor
Mississauga, ON
L5B 3C1

September 22, 2025

To the Attention of: Jaspreet Sidhu, Planner – Development Central/North
Steve Cha, Environmental Technologist

Re: Commitment Letter: Decommissioned Incinerator Assessment

Location: 1470 Williamsport Drive, Mississauga, ON
Insured: 1470 Williamsport Holdings Inc.
Our File: 251684REM
Your File: OZ/OPA 25-7 W3

1.0 BACKGROUND

We were contacted by Sajecki Planning Inc. to investigate findings from the Phase Two Environmental Site Assessment (ESA), prepared by DS Consultants Ltd., which identified an incinerator that had reportedly been decommissioned and that was located in the basement of 1470 Williamsport Drive in Mississauga, Ontario (the “subject property”). The original request was received by the City of Mississauga in relation to Environmental Engineering Reviewer comments related to **File No. OZ/OPA 25-7 W3**.

It is our understanding that the subject property is currently owned and operated by 1470 Williamsport Holdings Inc., and that the previous building owners were reportedly involved in the decommissioning of the incinerator on an unknown specific date, estimated to be several years ago. We understand that the previous owners are no longer involved, and that 1470 Williamsport Holdings Inc. was not provided with any decommissioning reports, documentation, or information.



This report is based on our site examination, the reported information, and our engineering analysis.¹ This report is a summary² overview of the circumstances surrounding this location and should not be considered a complete technical document. Should you require a more detailed report, one can be prepared.

2.0 REPORTED INFORMATION

Mr. Darren Stoke, the superintendent at the subject property, provided us with access to the basement boiler room and the incinerator during our site examination on August 25, 2025, and provided the following information:

- He had been the superintendent at the subject property for approximately two years.
- His understanding was that the incinerator had been decommissioned well before he started in his current position as superintendent.
- He did not know when it was decommissioned.
- The incinerator and its components had never been used during the time he had worked at the subject property.
- He did not have any documentation confirming any aspect of the decommissioning of the incinerator.

3.0 SITE EXAMINATION

Mr. Grant Elligsen of 30 Forensic Engineering attended the subject property on August 25, 2025, to examine the incinerator, confirm whether it had been fully decommissioned, and provide recommendations, as needed.

During the assessment, we observed the following:

- The exhaust ventilation ductwork had been disconnected.
- The natural gas fuel system had been disconnected.
- The electrical system had only been partially disconnected. Specifically, the rear blower fan had been disconnected, while the front blower fan was still operational. We toggled the control switch, which caused the front blower to turn on momentarily until we toggled the switch off.
- All chambers to access the interior of the incinerator (i.e., waste feed, combustion chamber, ash pit, etc.), as well as the fly ash exhaust shaft and the fly ash pit, were unlocked and operable.

¹ Our conclusions are based on independent and unbiased consideration of the information available as of the date of this report. We reserve the right to revise our conclusions if additional information becomes available or if it is shown that the information upon which we have relied to date was inaccurate.

² This report has been kept brief as requested. Should litigation be contemplated, we recommend a full report be commissioned.



- All existing components of the incinerator, as well as the fly ash exhaust shaft and the fly ash pit, were filled with ash.

Note: The ash must be considered hazardous and potentially leachable unless environmental testing proves otherwise. As such, proper precautions must be taken to protect workers and the environment.

4.0 DISCUSSION AND CONCLUSIONS

Based on our site observations, we can confirm that steps had been taken to make the incinerator partially inoperable and no longer capable of combustion. However, the incinerator had not been fully and adequately decommissioned.

It is our understanding that 1470 Williamsport Holdings Inc. is committed to ensuring full decommissioning and is planning the complete removal of the incinerator by implementing the following recommendations, which would need to be overseen and confirmed by 30 Forensic Engineering or other qualified parties:

- Conduct hazardous materials (i.e., asbestos, lead, etc.) sampling and analysis, in accordance with Ontario Regulation 490: *Designated Substances* ("O. Reg. 490") and Ontario Regulation 278: *Designated Substances – Asbestos on Construction Projects and in Buildings and Repair Operations* ("O. Reg. 278"), to confirm the occupational health and safety measure that must be implemented to ensure worker and occupant safety.
- Conduct toxicity characteristic leaching procedure (TCLP) sampling and analysis, in accordance with Regulation 347: *General – Waste Management* ("Reg. 347"), to confirm the waste disposal requirements.
- Fully disconnect the electrical connections, distribution wiring, and supply breakers at the panels and motor control centres.
- Remove the natural gas piping fully, back to the main building supply, such that the pipes are no longer in the vicinity of the incinerator.
- Abate the assumed hazardous ash waste in accordance with a Scope of Work report, to be developed by 30 Forensic Engineering or other qualified parties, based on the results of the environmental sampling, which will include worker protections and establishing a contained work area under negative pressure to protect adjacent areas and occupants of the building.
- Conduct milestone inspections of the abatement to confirm the work is being conducted in accordance with the Scope of Work report. The milestone inspections shall include the following:
 - A pre-abatement inspection of the work area enclosure;
 - Inspection during the ongoing work to confirm the work is aligned with the scope;
 - Clearance visual inspection upon completion of the abatement to confirm that all ash, dust, and debris have been adequately removed; and



- Airborne clearance sampling, as needed depending on the results of the environmental testing.
- Upon completion of the abatement, there are two options to confirm the incinerator is fully decommissioned, as follows.
 - Ensure all access doors to the interior of the incinerator are permanently locked or welded shut.

Note: This option results in increased difficulty with the complete removal of the incinerator from the subject property at a later date.
 - Dismantle the incinerator under abatement protocol, contain and remove the debris from the subject building, and dispose of it according to the requirements of the environmental testing.

Upon successful completion of the abatement and decommissioning of the incinerator, a Clearance and Completion report confirming the same should be issued, by 30 Forensic Engineering or another qualified party.

This completes our assessment to date. If you have any questions, please do not hesitate to contact us.

Sincerely,

Grant Elligsen, CFSC, CRSP, CHSC, P.Eng.
September 22, 2025