Appendix A
Community Health and Safety Approach (HASA) Guideline

This document is prepared as a guideline for typical requirements to be considered by the owner of a site where building contaminants are known to have existed, and to protect public health and safety. It does not replace an owner's intended plans nor their responsibility to provide appropriate health and safety protections.

Engagement & Roles

The following sections provide information on the roles of various parties engaged in and potentially affected by the project.

1. Joint Oversight Table (JOT)

The purpose of the JOT is to provide a method of engagement and communication between the stakeholders, rightsholders, and affected community and is comprised of the participants required to adequately support the project. The composition, frequency of meetings and topics are determined by the needs of the project, and agencies with consideration of including representation from the following sample groups (or other groups as may be required):

- City of Peterborough: Building Services (permit/inspection), Public Works (linear infrastructure impacts), Communications, Legal, and Planning/Heritage.
- Ministry of Environment Conservation and Parks (MECP): Oversight of compliance with regulations through a review of submissions and providing technical comments to ensure protection of public health and the environment.
- Lakelands Public Health (advisory): advise on community health risk communication and exposure thresholds.
- Proponent (Owner) and Prime Contractor (Constructor under OHSA).
- Independent Environmental Monitor (IEM), retained by City and funded by owner (arms-length): audits field controls, verifies monitoring data, issues communications.
- Other oversight agencies as may be required.

Standing sub-groups reporting to the JOT:

These groups may be established if necessary, depending on the stage and complexity of the project.

- Technical Review Team: Participants are to be identified as needed and where the depth and complexity of the technical aspects of the project are to be reviewed and reported to the JOT. The duration and membership of this team may change through the project as issues are identified and addressed to meet the needs of the JOT.

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Community Engagement Group (CEG)

The community engagement group is intended to meet the community needs through shared information that addresses specific concerns of the residents, businesses, and broader community.

Inclusion of Land Rights Holders and first nation community participation.

2. Regulatory and Technical Submission Considerations

The Owner is required to make various regulatory and technical submissions as part of the approval and communication process. This may not be a comprehensive list of submissions, and it is up to the owner to ensure all regulatory submissions are completed. The following are typical requirements prior to the start of demolition:

Permits/Notices & Agency Interfaces

- Building Code Act, Demolition Permit: The prescribed form for application for a permit to Construct or Demolish is set by the province and includes a section that confirms the applicant's acknowledgment that the submission is complete and in compliance with applicable law. Note that the municipality has limited authority under the Building Code Act to pass by-laws, and these are specifically prescribed in the Act and limited to Building Code requirements only. It is the owner's responsibility to confirm that the demolition activities will not contravene any applicable law.

- Ontario Heritage Act: Where structures are designated under Part IV of the Act, they are to be protected and may not be removed or altered without written permission from City Council. The submissions and approvals form part of the process. Where structures have not been designated under Part IV of the Act but have been listed on the City's heritage register as being of cultural heritage value or interest, such structures may not be removed or demolished without the owner giving City Council at least 60 days notice in writing of their intent to demolish or remove the structure.

- Occupational Health and Safety Act / O. Reg. 213/91 (Construction Projects): These requirements are the responsibility of the company responsible for demolition activities.

- Ministry of Environment, Conservation and Parks—Environmental Compliance Approvals (ECAs) & permissions:

  The Ministry of Environment, Conservation and Parks (MECP) involvement may include these or other items specific to the site conditions and as determined by them in consultation with the owner. Considerations include:

  - Sewage works / dewatering discharges under Ontario Water Resources Act s.53, ECA required for discharges to storm/stormwater systems.

  - Air & noise ECAs if on-site equipment (e.g., crushing/screening, large generators) triggers Environmental Protection Act s.9; NPC-300 governs noise assessment.

  - Spills: ensure procedures for immediate reporting to MECP Spills Action Centre for any discharge to the natural environment.

- Excess Soil (if foundations/slabs/soils are disturbed): comply with O. Reg. 406/19 and the Soil Rules (notice filing to the RPRA Excess Soil Registry where applicable; QP-led planning/characterization; reuse/receiving site rules; landfill restrictions as of Jan 1, 2025).

- Hazardous Waste movements: use Resource Productivity and Recovery Authority (RPRA) Hazardous Waste Program Registry for manifests; meet Transportation of Dangerous Goods Registry (TDGR) for transportation requirements where the target substances are identified hazardous waste.

- PCBs & refrigerants/halocarbons/mercury: ensure compliance with federal PCB Regulations and Ontario O. Reg. 463/10 for ozone-depleting/halocarbon refrigerants; manage mercury-containing lamps consistent with federal product regs and guidance.

Technical documents required

The following are a list of reports and studies that may be applicable to the project and if identified as such, are to be prepared and submitted to the appropriate regulator and City:

- **Designated Substances Survey (DSS)** covering asbestos, lead, silica, etc. (industry standard, supports OHSA s.30 duties & City permit).

- **Asbestos Management & Abatement Plan** compliant with O. Reg. 278/05 (classifying Type 1/2/3 ops, training, air sampling, clearances).

- **Lead & Silica Exposure Control Plans** aligned with MLITSD guidelines (work classification; respiratory protection; hygiene; medical surveillance as applicable).

- **Demolition Environmental Management Plan (DEMP)** (IEM reviewed) that consolidates:

  - **Dust & Air Emissions Control** using MECP's fugitive dust technical bulletin and federal best practices.

  - **Noise & Vibration Management** (NPC-300; work hours aligned with City noise by-law).

  - **Surface water & dewatering** (OWRA s.53; erosion/sediment controls).

  - **Waste & Materials Management Plan** (segregation; manifests; receiver ECAs).

- **Traffic & Logistics Plan** (haul routes, decontamination station, track-out control).
- **Emergency Response Plan** (spill, fire, uncontrolled dust release) with 24/7 contacts and Spills Action Centre protocol.
- **Health Impact Assessment (HIA)** To be prepared by owner and requires peer review and plain-language summary.

3. Technical controls during demolition (field execution)

The following are typical controls to be deployed during demolitions. The owner is to ensure all necessary controls are implemented that are required by regulation and required to meet specific site conditions and to be overseen and confirmed by the appropriate agency.

Worker protection

- Follow O. Reg. 213/91 and hazard-specific controls:
  - Asbestos: survey-driven abatement (O. Reg. 278/05), Type-classified procedures, negative pressure enclosures where applicable, air sampling and clearance prior to demolition access.
  - Lead: classify work (Type 1/2/3), respiratory protection, hygiene/change facilities.
  - Silica: wet methods, HEPA extraction, task-based controls and exposure monitoring.
  - Maintain Notice of Project and Form 1000 on site; verify worker certifications.

Community air quality protections

- **Perimeter air monitoring network** (IEM-operated) with real-time particulate (PM10/PM2.5), and task-based integrated sampling for asbestos fibers/lead/silica during high-risk activities (e.g., façade removal, mechanical demolition, on-site processing).
- **Action levels & stop-work**: pre-defined thresholds trigger immediate dust suppression intensification or stop-work and root-cause/corrective action; publish excursions within 24 hours.

- **Dust suppression**: water misting, negative pressure inside enclosures, cover/secure debris, wheel wash & street sweeping, no dry sweeping; align with Environment Canada's construction/demolition air best practices and MECP's fugitive dust bulletin.

Noise & vibration

- Conform to NPC-300 and City noise by-law work hours (post schedule and exceptions). Where vibration risks exist, deploy seismographs and notify neighbours ahead of high-energy activities.

Water & sediment

- Protect catch basins; install silt controls; treat/process turbid water as needed; comply with ECA for discharges to storm where required.

Materials, waste & hazardous components

- **Segregate**: scrap metal (recycle), clean concrete/brick, contaminated materials, universal wastes.
- **Hazard removals prior to demo**: PCBs (equipment/transformers), mercury lamps, refrigerants/halocarbons, lead-paint components—handle under applicable federal PCB regs, Ontario O. Reg. 463/10, and federal mercury product rules; document chain-of-custody and receiver licenses.
- **Manifests & tracking**: use the RPRA Hazardous Waste Registry; keep weigh tickets and certificates of acceptance and post summaries.

4. Transparency, trust, and two-way communications

Community priority is required to ensure that trust and transparency are created through the project. The following are aspects to be considered in supporting effective two-way communication. Ideally this is supported by the owner through their own media channels and information pages.

Public commitments (published)

- **Plain-language summaries** of all technical submissions (DSS, abatement plans, DEMP, HIA, ECAs).
- **Live dashboards**: perimeter PM data, asbestos/lead/silica summaries, waste shipments (counts & destinations), complaints log with response times.
- **Public Meetings** (JOT + IEM), and other engagement and communication meetings established to meet specific project and community objectives.

- **Single 24/7 hotline + email**; commit to response within one business day for non-urgent items; immediate call-back for alarms/exceedances.

5. Independent Environmental Monitor (IEM)

The IEM is intended to be an independent firm hired by the City to oversee on-site and perimeter activities that have potential to impact the environment outside of the property limits. This firm is to be funded by the property owner at no cost to the City and in support of ensuring transparency, awareness and public safety. This role includes:

- Authority to issue stop-work recommendations to the Constructor and notify City/MECP when action levels are exceeded, or procedures aren't followed.
- Weekly public memos in plain language; field audits 2–3 times/week minimum.
- Maintain a public "Commitment Register" (who/what/when/status) and Issues Tracking Matrix with aging items.
- Preserve complete demolition records (including video/photo logs) for historical/health documentation.

6. Demolition Phasing & deliverables checklist

Pre-mobilization (Gate 1 – "Permit Ready")

- JOT formed; terms of reference approved; IEM contracted.
- All permits/notices/ECAs filed; DSS & hazard abatement plans approved; DEMP approved; HIA posted.
- Public microsite live; hotline operational; baseline air/noise monitoring week completed (publish baseline).

Early works & abatement (Gate 2 – "Start")

- Hazard removals verified (asbestos clearances, PCB/refrigerant/mercury removal complete with manifests).
- Perimeter monitors commissioned; action levels tested via drills; ERP drill completed.
- Rodent and Vector control plan in place for off-site response.

Structural demolition (Gate 3 – "Go/No-Go" per building)

- Pre-demo IEM walk-down checklist signed; adjacent resident notifications issued (72 hours).

- Daily IEM field audits; weekly public dashboards and memos; stop-work rules in effect.

Post-demolition (Gate 4 – "Closeout & Stabilize")

- Site stabilized (dust/erosion controls); all waste certificates and monitoring closeout posted; lessons learned report; JOT transitions to remediation planning.
- If future land use change is contemplated, begin Record of Site Condition process (O. Reg. 153/04) and related soil management planning.