

February 2, 2022

File: 33256

Clean Harbors Canada Inc. 4090 Tefler Road, R.R. #1 Corunna, Ontario N0N 1G0

Attention: Mr. Michael Parker Vice President, Canadian Environmental Compliance

GEOTECHNICAL PEER REVIEW GHD RESPONSE LETTER OF JANUARY 28, 2022 CELL 20-1 SLOPE STABILITY ISSUES CLEAN HARBORS LAMBTON LANDFILL FACILITY CORUNNA, ONTARIO

Dear Mr. Parker:

Thurber Engineering Ltd. (Thurber) has prepared the following comments to GHD's letter of January 28, 2022, "Responses to Geotechnical Peer Review and Updated Assessment – Cell 20-1 Slope Issues, Clean Harbors Lambton Landfill Site" (i.e. Thurber Peer Review letter of December 23, 2021).

In general, GHD in its response letter, has filled in most of the missing information noted in the Thurber Peer Review Letter. For expediency, the following presents only outstanding issues that in our opinion require additional consideration when interpreting the geotechnical models for implementation during landfilling.

This letter references the following GHD reports:

- Geotechnical Evaluation and Remedial Plan (GHD Report) Cell 20-1, Slope Issues – Clean Harbors Lambton Facility Landfill Corunna, Ontario, dated November 12, 2021
- Addendum to the Geotechnical Evaluation and Remedial Plan (GHD Addendum) Cell 20-1, Slope Issues – Clean Harbors Lambton Facility Landfill Corunna, Ontario, dated December 17, 2021
- Geotechnical Investigation (GHD Geotechnical Design Report) Cell 20, Subcell 1 Clean Harbors Lambton Facility Landfill Corunna, Ontario, dated January 19, 2021



1. SLOPE STABILITY MODELLING

GHD utilized Geo-Studio 2021, SLOPE/W module, to complete the slope stability modelling, both for the design of the slope and subsequent post slope movement analyses. In its response letter, GHD has updated its modelling to include site conditions encountered during recent investigations, including deep hydrostatic impacts.

In reviewing the most recent modelling results, the following questions arise:

- Instead of modelling the hydrostatic pressure through the permeable zone in the bedrock, GHD has applied it by subdividing the Black Shale Till layer and applying it to the lower subdivision. It is unclear why this was done or how it affects the modelling results, particularly since the Black Shale Till is not a water bearing soil. GHD should provide further description of this aspect of the model.
- GHD should provide figures showing the hydrostatic pressures and pore pressures assumed throughout each modelled area.
- Please provide a figure showing the full array of nodes used for modelling each section and the minimum FS calculated for each.
- In Figure 7, GHD indicates that CKD has a unit weight of 21 kN/m³. Based on our past experience with CKD, this is a very high unit weight. We recommend that this value be confirmed through testing.

2. MINIMUM FACTOR OF SAFETY

In its initial Geotechnical Design Report, GHD identified a minimum Factor of Safety (FS) for slope design should be 1.3. This minimum FS was continued to be utilized by GHD in its two post slope movement reports, GHD Report and GHD Addendum.

In its recent response letter, GHD identifies slope FS that are below 1.3 and as low as 1.16. Given the Site history of slope movements, these low FS represent a significant risk that should be mitigated through design and/or monitoring.

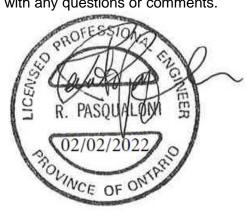
We recommend that Clean Harbors develop remedial plans to improve the FS during filling the open landfill cell as soon as possible, given site conditions and weather. The proposed slope monitoring program should also be sufficiently robust to detect slope instability for safety and allow for remedial responses, as possible. Particular attention should be given to the potential impacts of the spring thaw, and the implementation of additional monitoring at that time.



We would be happy to discuss these comments further.

Please feel free to contact us with any questions or comments.

Yours truly, Thurber Engineering Ltd.



Renato Pasqualoni, P.Eng. Principal



STATEMENT OF LIMITATIONS AND CONDITIONS

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This Report has been prepared in accordance with generally accepted engineering or environmental consulting practices in the applicable jurisdiction. No other warranty, expressed or implied, is intended or made.

2. COMPLETE REPORT

All documents, records, data and files, whether electronic or otherwise, generated as part of this assignment are a part of the Report, which is of a summary nature and is not intended to stand alone without reference to the instructions given to Thurber by the Client, communications between Thurber and the Client, and any other reports, proposals or documents prepared by Thurber for the Client relative to the specific site described herein, all of which together constitute the Report.

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The Report has been prepared for the specific site, development, design objectives and purposes that were described to Thurber by the Client. The applicability and reliability of any of the findings, recommendations, suggestions, or opinions expressed in the Report, subject to the limitations provided herein, are only valid to the extent that the Report expressly addresses proposed development, design objectives and purposes, and then only to the extent that there has been no material alteration to or variation from any of the said descriptions provided to Thurber, unless Thurber is specifically requested by the Client to review and revise the Report in light of such alteration or variation.

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- a) Nature and Exactness of Soil and Contaminant Description: Classification and identification of soils, rocks, geological units, contaminant materials and quantities have been based on investigations performed in accordance with the standards set out in Paragraph 1. Classification and identification of these factors are judgmental in nature. Comprehensive sampling and testing programs implemented with the appropriate equipment by experienced personnel may fail to locate some conditions. All investigations utilizing the standards of Paragraph 1 will involve an inherent risk that some conditions will not be detected and all documents or records summarizing such investigations will be based on assumptions of what exists between the actual points sampled. Actual conditions may vary significantly between the points investigated and the Client and all other persons making use of such documents or records with our express written consent should be aware of this risk and the Report is delivered subject to the express condition that such risk is accepted by the Client and such other persons. Some conditions are subject to change over time and those making use of the Report should be aware of this possibility and understand that the Report only presents the conditions at the sampled points at the time of sampling. If special concerns exist, or the Client has special considerations or requirements, the Client should disclose them so that additional or special investigations may be undertaken which would not otherwise be within the scope of investigations made for the purposes of the Report.
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- c) Design Services: The Report may form part of design and construction documents for information purposes even though it may have been issued prior to final design being completed. Thurber should be retained to review final design, project plans and related documents prior to construction to confirm that they are consistent with the intent of the Report. Any differences that may exist between the Report's recommendations and the final design detailed in the contract documents should be reported to Thurber immediately so that Thurber can address potential conflicts.
- d) Construction Services: During construction Thurber should be retained to provide field reviews. Field reviews consist of performing sufficient and timely observations of encountered conditions in order to confirm and document that the site conditions do not materially differ from those interpreted conditions considered in the preparation of the report. Adequate field reviews are necessary for Thurber to provide letters of assurance, in accordance with the requirements of many regulatory authorities.

6. RELEASE OF POLLUTANTS OR HAZARDOUS SUBSTANCES

Geotechnical engineering and environmental consulting projects often have the potential to encounter pollutants or hazardous substances and the potential to cause the escape, release or dispersal of those substances. Thurber shall have no liability to the Client under any circumstances, for the escape, release or dispersal of pollutants or hazardous substances, unless such pollutants or hazardous substances have been specifically and accurately identified to Thurber by the Client prior to the commencement of Thurber's professional services.

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