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July 21 09

MUNICIPALITY OF PORT HOPE

56 Queen Street
Port Hope, ON
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(905) 885-4544

Administration Report

Date: July 16, 2009

Report to: Protection to Persons & Property Committee

From: R. Carl Cannon, CAO

Re: Atomic Energy of Canada Limited's (AECL) application for a Waste Nuclear Substance License for the Port Hope Long-Term Low-Level Radioactive Waste Management Project (PHAI)

Recommendation:

That the Municipality of Port Hope authorize Hardy Stevenson and Associates Limited to submit to the Canadian Nuclear Safety Commission the July 15, 2009 report on behalf of the Municipality for the Atomic Energy of Canada Limited's (AECL) application for a Waste Nuclear Substance License for the Port Hope Long-Term Low-Level Radioactive Waste Management Project in Port Hope, Ontario and; further, the submission shall be forwarded to the CNSC in compliance with the CNSC's July 27, 2009 deadline and submission requirements and shall:

- Reference the appropriate file name;
- Advise that the Municipality of Port Hope requests to make an oral presentation at the August 26, 2009 CNSC hearing; and
- Include all applicable information and documents.

Background:

Please see the attached correspondence from Hardy Stevenson and Associates for the PP & P Committee's consideration. Mark Stevenson will speak to the subject document as a delegation at the July 21, 2009 meeting.

Conclusions:

The subject correspondence appropriately addresses Municipal concerns regarding the license and license process as determined by the CNSC. It is staff's conclusion that the report be forwarded by Hardy Stevenson and Associates on behalf of the Municipality in accordance with the CNSC's July 27, 2009 timeline and submission requirements and that the Municipality seek intervenor status (i.e. oral presentation) at the August 26, 2009 hearing to be held in Port Hope.

H A R D Y
STEVENSON
AND ASSOCIATES

July 15, 2009

Mr. Carl Cannon
Chief Administrative Officer
Municipality of Port Hope
P.O. Box 117
Port Hope, Ontario
L1A 3V9

Re: Atomic Energy of Canada Limited's (AECL) application for a Waste Nuclear Substance Licence for the Port Hope Long-Term Low-Level Radioactive Waste Management Project.

Dear Mr. Cannon,

This letter provides the Municipality of Port Hope with comments on AECL's Application for a Waste Nuclear Substance Licence for the Port Hope Long-Term Low-Level Radioactive Waste Management Project ("Project"). The Municipal and public comments on the licensing application must be received by the Canadian Nuclear Safety Commission ("CNSC") ("Commission") by the end of day July 27, 2009.

Recommendation:

That the Municipality of Port Hope authorize Hardy Stevenson and Associates Limited to submit to the Canadian Nuclear Safety Commission this report on behalf of the Municipality for the *Atomic Energy of Canada Limited's application for a Waste Nuclear Substance Licence for the Port Hope Long-Term Low-Level Radioactive Waste Management Project*. The submission is to be forwarded to the CNSC in compliance with the CNSC's July 27, 2009 deadline and submission requirements.

The correspondence should reference the file name: "*Atomic Energy of Canada Limited's Application for a Waste Nuclear Substance Licence for the Port Hope Long-Term Low-Level Radioactive Waste Management Project, CNSC Public Hearing, August 26, 2009, Port Hope, Ontario*". We understand that the Municipality of Port Hope wishes to make an oral presentation at the August 26, 2009 CNSC hearing into this matter. In that case, the correspondence should state that the Municipality wishes also to make an oral presentation and include the name, address and telephone number of the contact person.

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1.0 Purpose of Report

The purpose of this report is to provide the Municipality with an overview of the licensing process and the licence application for the Port Hope Project and to provide the comments and recommendations of the Municipal Peer Review Team (MPRT) on AECL's Application for a Waste Nuclear Substance Licence for the Port Hope Long-Term Low-Level Radioactive Waste Management Project. These comments, conclusions and recommendations are intended to represent the Municipality's intervention to the CNSC.

2.0 Overview of the Port Hope Project

The Port Hope project is one of two projects under the Port Hope Area Initiative. The Project consists of:

- Construction of the long-term low-level radioactive waste management facility (LTWMF) south of Highway 401 between Baulch and Brand roads;
- Remediation of the existing Welcome Waste Management Facility;
- Remediation of low level radioactive substances from various sites within the Municipality of Port Hope and transfer to the new LTWMF;
- Remediation of specified industrial wastes and transfer to the new LTWMF, and;
- Maintenance and monitoring of the facility for hundreds of years.

The Project consists of three phases after the issuance of the licence:

- Phase 1 is the completion of the approvals stage with the preparation by AECL of the detailed engineering design and technical documents for submission and approval by the CNSC prior to the start of construction, and the management of the Welcome Waste Management Facility. This stage is anticipated to take two to three years;
- Phase 2 is the Construction and Development of the LTWMF and remediation of contaminated sites which is to begin after the detailed design is approved by the CNSC. It is expected take up to seven years to complete; and,
- Phase 3 is the Long-term maintenance and monitoring of the LTWMF.

3.0 The Importance of the Project to the Municipality

The Port Hope Project is very important to the Municipality of Port Hope. Residents and past Councils as well as the current Council have worked hard over the past 30 or more years to have the historic LLRW in the community cleaned up. During this time, the Municipality of Port Hope has been involved in various attempts to find a solution to the waste issue. None have come this far.

A stigma has been attached to Port Hope due to the presence of the waste and this has been exacerbated by negative coverage in the national media. The repercussions can be immediate, severe and extensive: retail business decline, business interest in Port Hope fades and fewer people express interest in relocating to Port Hope. Additionally, tourism is affected each time a negative piece appears in the national media. It takes time and effort to re-build the positive image that the Municipality and the community have worked hard to create.

The Municipality of Port Hope views the issuance of a Waste Nuclear Substance Licence for the Project as a major milestone. It confirms that the Project can proceed safely and with minimal environmental effects. As well, the completion of the Construction and Development Phase of the

Project will bring important benefits. The stigma so long attached to the community will be removed and the environment will be restored and enhanced. The Municipality and the community of Port Hope want the Project to move ahead as soon as possible while ensuring the protection of the public, workers and the environment.

4.0 CNSC Licensing Process and Public Hearing

The Canadian Nuclear Safety Commission is the sole authority for regulating the use of all nuclear energy and materials in Canada under the *Nuclear Safety and Control Act*. The CNSC is a quasi-judicial body that is independent from the Government of Canada, but does not function in isolation from it. It regulates the use of nuclear energy and materials to protect the health, safety and security of persons and the environment.

The CNSC can grant a Waste Nuclear Substance Licence (WNSL) for the Port Hope Project. The WNSL will address all radiological aspects of the Project, including site preparation, construction, operation, decommissioning and abandonment of the Long Term Waste Management Facility, the excavation of the low level radioactive waste from the various sites located in Port Hope and transportation to the LTWMF.

The applicant for the licence, on behalf of Canada, is Atomic Energy of Canada Limited. The licensing submission consists of three high level documents (Licensing Manual, EA Follow-up Program Plan, and Water Treatment Strategy report) with the detail of design and construction to follow in the detailed design stage, referred to by the CNSC as Phase 1.

The CNSC will make its decisions on a Waste Nuclear Substance Licence for the Port Hope Project through a One Day public hearing process. The hearing will be held on August 26, 2009 at the Town Park Recreation Centre in Port Hope. It gives affected parties and members of the public an opportunity to be heard before the Commission. To allow potential intervenors to review the proposal and prepare for the hearing, the written submissions from AECL and the CNSC staff report were filed with Commission on June 26, 60 days prior to the hearing. Intervenors are invited to register their submission at least 30 days prior to the hearing.

At the One Day hearing, AECL (the proponent) and CNSC staff will make oral presentations based on their written submissions to the Commission and respond to questions from the Commission. Registered intervenors have an opportunity to make their views known to the Commission and to respond to any related questions from the Commission members. Following the public hearing, the Commission will deliberate and make its decision regarding a licence for the Project. The Commission's decision and its reasons for decision are normally published within 6 weeks after the conclusion of the hearing.

5.0 Proposed Licence

Licence Period and Activities

CNSC staff recommend a ten-year Waste Nuclear Substance Licence. The Licence will take into account the proposed project implementation timeline and is commensurate with the low risk of the project. The activities to be authorized by the proposed Waste Nuclear Substance Licence are to possess, manage and store nuclear substances that are associated with or arise from the operation of the Welcome Waste Management Facility or from the construction or/and operation of the LTWMF, including the remediation of contaminated sites and the transfer of waste material to the LTWMF.

Hold Points

AECL's Licensing Manual indicates that technical documentation in support of construction and operation of the LTWMF and off-site activities will be developed in stages. To address this, CNSC staff are recommending to the Commissioners that the WNSL include Hold Points at two strategic milestones in the process. At each Hold Point, work on the Port Hope Project would not proceed until the appropriate supporting documentation is submitted and accepted by CNSC. The first Hold Point is after the detailed design of the facility is complete and prior to construction of the LTWMF. The second hold point is prior to the long-term maintenance and monitoring phase. Upon acceptance by the CNSC of the technical documentation, AECL will be released from the Hold Point and allowed to proceed with the next phase of the Project.

Reporting

In order to provide opportunity for the Commission and the public to be advised and updated on the project development and licence performance, CNSC staff recommends that if the licence is issued for a ten-year period, that status reports to the Commission be submitted in three years (prior to authorization of on-site activities), and in seven years to report on the progress of off-site activities.

6.0 Comments on the Licence Application

We agree with the CNSC staff recommendation that a Waste Nuclear Substance Licence be issued for a 10-year period provided that the recommendation for hold points as a condition of the license is accepted. We also agree with the CNSC staff conclusion that "AECL is qualified to carry out the activities that the licence will authorize and will, if the licence is issued, make adequate provisions for the protection of the environment, the health and safety of persons ..." (CMD 09-H9)

The AECL licence application is supported by three high level documents with detail on all aspects of the Project to be provided during the detailed engineering design stage following licence approval. We had expected that the details of the project design and implementation would have been available prior to the licence hearing. To accommodate this, CNSC have recommended a regulatory hold point prior to construction. CNSC staff are to review the AECL submission and will not allow the Project to proceed to Phase 2, the Construction and Development Phase, until staff are satisfied with the engineering and technical submissions. The Municipal Peer Review Team comments on the licensing documents and the Atomic Energy of Canada Limited response is summarised below.

6.1 Level of Detail and Municipal Involvement in the Detailed Design

There is not enough detail in the application to fully appreciate how the Project will be implemented, how the mitigation measures will be applied and to confirm that the mitigation measures are likely to be successful. The Municipality of Port Hope needs input into the detailed design to ensure that its interests and those of its residents and businesses are adequately addressed. This is a complex project with a need for coordination of many Project, Vision 2010 and Municipal activities. However, the licensing submissions do not propose opportunities for consultation on the detailed design between the Municipality and AECL and/or CNSC. A lack of consultation constrains the ability of the Municipality to have further input into detailed project design and implementation and to have stronger assurances that Municipal concerns are addressed. Approval to advance from the hold points could include "Municipal satisfaction" as a criterion.

6.2 Clean-up Criteria

The CNSC CMD 09-H9 confirms that the “with and without development constraints” clean-up criteria accepted for the Environmental Assessment will be applied as part of the Licence. It indicates that “some form of institutional control or development constraints would be expected to apply to manage risk” for the industrial waste contaminated sites, areas within the LTWMF site and the Highland Drive Landfill site. We disagree that the Highland Drive Landfill should be cleaned up to the “with development constraints” clean-up criteria. The Municipality has expressed its view on numerous occasions that the Landfill, located in the urban area, is likely to be removed and redeveloped in the foreseeable future. The optimum use for the site could be for residential development. Therefore, the site should be cleaned up to the “without development constraints” clean-up criteria so that there are no restrictions or delays resulting from the presence of residual LLRW when the landfill is removed and development occurs.

The CNSC CMD 09-H9 does not confirm that the clean-up criteria will be updated if changes to the standards or guidelines for the Contaminants of Potential Concern (“COPC”) are made more stringent. This needs to be clearly stated in the licence to ensure that the clean-up is as robust as it should be; that all federal and provincial standards and guidelines are achieved and that the cleaned up sites would achieve “current and foreseeable unrestricted use” as required in the Legal Agreement (2001). Changes to the clean-up criteria need to be undertaken in consultation with the Municipality.

6.3 Licensing Manual

The Licensing Manual provides an overview of all aspects of the Port Hope Project. Detail on the construction of the LTWMF, remediation of the LLRW and industrial sites, transportation of the waste, construction and backfill materials will be further developed after the licence has been issued. The document describes actions and activities that are licensable under the waste nuclear substance licensing process. The following are our comments with respect to the Licensing Manual.

Final Cover Placement

In relation to the placement of the final cover, Port Hope should have the ability to agree upon the range of background levels of gamma radiation on the surface of the final cover to ensure that the range is consistent with the background levels in the general vicinity of the LTWMF.

Ground Water Treatment and Discharge

The Licensing Manual does not discuss ground water treatment requirements and technologies at the remediation sites. The CNSC staff CMD 09-H9 states that the water treatment requirements for the remediation sites are “expected to be addressed in the detailed design Report which is included as a hold point on the proposed license”. Ground water treatment and discharge are important aspects of the remediation of contaminated sites and require full and careful consideration. Therefore, the ground water treatment requirements and technologies as well as the discharge criteria must be addressed fully in the detailed design. These considerations should also remain part of the submission of technical documents prior to the proposed hold point.

We are pleased that the Licensing Manual acknowledges that treated groundwater from the Highland Drive Landfill can only be discharged to the municipal sewer system with the approval of the Municipality. This should also be the case for all discharge to the Municipal sanitary or storm sewer systems.

We note that the CNSC staff CMD 09-H9 identifies criteria for water quality for ground water and surface water discharge to the environment and to the municipal sanitary sewer system. These tables

require careful review to ensure that they contain the complete list of contaminants of concern and that the appropriate criterion is applied to each contaminant. For example:

- If the list of criteria is to apply to potential discharges from the non-LLRW industrial sites (e.g., coal gasification plant) then additional contaminants of concern (parameters) should be added. These typically include parameters such as Volatile Organic Compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs) and PCBs;
- Uranium and other metals should be included in Table 6.2.3 regarding discharge to the municipal sanitary sewer;
- All typical metals included in a standard sewer use by-law should be included; and,
- The values presented for arsenic are different on Table 6.2.3 (discharge to municipal sewer) and Appendix E (effluent discharge). These values need to be reconciled.

With respect to discharge to the municipal sanitary sewer, we note that some of the criteria are consistent with a good sewer use by-law such as the City of Toronto Sewer Use By-law while other criteria are not. We are of the opinion that best practices should be applied in determining the discharge criteria to either the environment or the sanitary sewer system.

Site Remediation and Backfill

Sites are to be remediated to achieve the “without development constraints” clean-up criteria so that in the future they are available for ‘current and foreseeable unrestricted use’. The Licensing Manual does not confirm that backfill used to restore the cleaned up sites will be tested to ensure that it is clean and achieves the appropriate Ontario Ministry of the Environment criteria. AECL has stated that this is to be considered “during the development of the additional program plans”. (J. R. Walker, 2009.)

Environmental Management

The Port Hope Area Initiative Environmental Management and Protection Plan could include the relationship to the Follow-Up Program and findings of the Environmental Assessment Study Report (“EASR”) and Screening Report. The Port Hope Area Initiative Fire Protection Plan should include reference to the Municipality’s Fire and Emergency Services operations. AECL has indicated that these matters will be considered in the development of additional program plans.

Construction Monitoring Program

The Construction Monitoring Program (CMP) is one of the Interim Waste Management Programs. Through it the federal government provides soils monitoring for excavation in the urban area of Port Hope. We believe that this Program should continue for a number of years after remediation is complete as a further verification that the Project has successfully identified and cleaned up the LLRW in Port Hope.

Waste Characterization

We note that there is some uncertainty in terms of the characterization of the LLRW at various sites in Port Hope (e.g., small scale sites, Sculthorpe Marsh and some of the CNR and CPR properties). The contamination re-survey program will provide a more complete delineation of the waste substance material and the volume.

6.4 EA Follow-up Program Plan

Many mitigation measures to reduce or eliminate effects to residents and businesses were listed in the Environmental Assessment Study Report (EASR). The EA Follow-up Program Plan provides a Plan for the development and implementation of the EA Follow-up Program for the Port Hope Project. The Plan describes the goals, framework and general schedule for the implementation of the Follow-

up Program activities. The Plan is general in nature. No significant detail is provided with respect to monitoring or contingency plans related to follow-up activities. In addition, the document generally addresses only the mitigation measures related to the net effects of the environmental assessment – effects after mitigation. It assumes that the mitigation measures have been successfully applied to the predicted effects. This may not always be the case. A tracking system is required to ensure that the mitigation measures identified in the EASR to arrive at the net effect are applied and are successful. The details are to be provided in the Follow-up Program when it is developed. The following outlines our specific comments.

Sculthorpe Marsh

In relation to the Sculthorpe Marsh, the Municipal position is stated as “the desire that the marsh be remediated to allow current and foreseeable unrestricted use as stipulated in the Legal Agreement”. We contend that the site should be fully characterized so that a waste excavation management plan to achieve the “without development constraints” clean-up criteria can be developed. We are confident that the marsh can be fully re-instated after cleanup.

Air Quality

Air quality during the clean-up is very important. The documents leave many of the details of the air quality management and monitoring program to the design stage. There needs to be a full evaluation of the approach to air quality management and monitoring including the selection of technologies and processes, the application of real time air quality monitoring at sensitive locations and the locations of monitors in the community. The evaluation should address the monitoring requirements at each remediation site, along the transportation route and at the LTWMF independently. The Municipality should be fully engaged in such an evaluation.

Some air quality mitigation measures are identified in the report. However, they should include “Avoiding work if high wind conditions are anticipated”, in addition to “Restricting or ceasing work under high wind conditions”. This could avoid situations where the winds become excessive before work is restricted or ceased, reducing the possibility of emissions from the site. In addition, final follow-up surface soils testing should be undertaken at a nearby location after completion of the construction phase at key locations to confirm that contamination has not occurred.

Noise

We remain concerned that work in the evenings at the LTWMF and major remediation sites could disrupt residents and neighbourhoods. Noise anticipated during the harbour remediation has the potential to affect businesses and residents. The noise criteria and mitigation measures should be evaluated in consultation with the Municipality during detailed design.

Ground Water Levels

Regarding groundwater flow, lowering the groundwater could impact wells in the area. Water wells accessing this groundwater should be monitored for effects on levels and quality.

Socio-economic Effects Management Program

We have commented previously that the duration of the remediation activities in the urban area of Port Hope is unique and could effect local business operations, particularly in the downtown area. Therefore a program is required to monitor and address financial losses of businesses. In addition, businesses should be informed of construction activities and timing in “Pre-Construction” so that, if required, they can plan for changes that may occur.

AECL responded that a Socio-economic Effects Management Plan will be developed during the detailed design stage to provide a more detailed description of the proposed monitoring programs. Additionally, AECL believes that the proposed Complaint Resolution Process could be used to address the issue of financial losses to businesses. The Municipality and business owners/operators should be involved in the development of that aspect of the socio-economic effects management program and/or the Complaints Resolution Process.

6.5 Water Treatment Strategy

The Water Treatment Strategy report addresses a new water treatment system to replace the water treatment system now in place at the Welcome Waste Management Facility. The strategy presents water treatment options for the treatment of groundwater, leachate and surface water run-off associated with the existing Welcome Waste Management Facility (WMF) and the proposed Long Term Waste Management Facility (LTWMF). The report identified two alternative approaches to the treatment of the water:

- Ferric Chloride precipitation as the main and lead process followed by Reverse Osmosis as a polishing process; and,
- Reverse Osmosis as the main and lead process with Ferric Chloride precipitation treatment for the reject stream.

The selection of the preferred alternative is to be made based on the results of bench top and pilot scale testing during the detailed design stage of the Project.

The MPRT review is based primarily on water and leachate quality aspects of the water treatment system as follows:

Influent Volumes and Concentrations

The effluent will be derived from a variety of sources including surface water runoff, ground water collection, and leachate collection. The volumes and concentration of contaminants in each of these effluent streams varies considerably, which is not clearly recognized in the report.

As a result of the variability in volumes and concentrations of contaminants, it may be prudent to treat each of the waste streams differently, at different stages of the landfill construction and operation. This may be the best way to achieve the lowest mass loading of contaminants. Currently the treatment method is proposing to combine all the waste streams, which will result in considerable dilution, particularly of the leachate stream. It may be more difficult to minimize mass loadings of contaminants when they are highly dilute. In addition, there should be greater consideration of the overall quantity of mass loadings to the environment during the detailed design stage.

The potential impact of contaminants which are derived from the clean-up of the industrial sites has not been discussed. The report currently suggests that certain contaminants (such as PAH compounds from the coal gasification plant) may contribute significantly to effluent quality. If this is the case then consideration could be given to pre-treatment of certain wastes in order to minimize their impact on effluent quality in the long term.

AECL responded that it is more efficient to address a blended or equalized influent stream rather than a series of individual waste streams. It is also considered more efficient to design the water treatment system according to the design and character of the LTWMF and not to have separate treatment processes for different flows. During the further development of the treatment system requirements, opportunities for diverting uncontaminated surface flows will be examined. In addition, since the Contaminants of Potential Concern are present in most waste streams and there

are a limited number of dominant streams, the weighted mass balance approach should yield a reasonable estimate of water quality and variability.

AECL also stated that the strategy proposed has been designed to collect all contaminated water flows to minimize loadings to the environment. The technology has been selected on the basis of Best Demonstrated Available Technology that is economically achievable with a target contaminant removal efficiency of 99 percent or greater.

7.0 Conclusion

The Municipal Peer Review Team agrees with the CNSC staff conclusion that AECL is qualified to manage the Welcome Waste Management Facility and to carry out the activities that will be authorized by the licence and that AECL has the capability to protect the environment and the health and safety of the public and workers during the Port Hope Project.

While the licensing process should proceed, the level of detail provided with this licence application is not yet sufficient for the Municipality to determine whether its interests are completely addressed. It is therefore important for the Municipality to be actively involved throughout Phase 1 in the review of all relevant detailed engineering design and technical documents.

We further conclude:

- That the Municipality should continue to work with Natural Resources Canada and the CNSC to ensure that it has access to, provides comment on and is consulted on the detailed engineering design and technical documentation;
- That the Municipality request the Commission to include the Municipality's comments on the detailed engineering design and technical documentation in its consideration of releasing the hold point at the end of Phase 1 and that AECL not proceed until the Municipality's concerns have been adequately addressed;
- That the licence for the Port Hope Project include a statement that the clean-up criteria will be adjusted to include changes in federal and/or provincial regulatory standards or guidelines for the contaminants of potential concern. And that any modification to the application of the clean-up criteria not proceed without Municipal concurrence;
- That the Municipality request the Commission to ensure that the Municipal Peer Review Team comments provided in this report are addressed; and,
- That the CNSC should be advised that this project is very important to the Municipality and the community of Port Hope and that it needs to move forward as quickly as possible while ensuring the protection of the public, workers and the environment, subject to reasonable Municipal involvement opportunities as noted previously in this report.

References:

- AECL, 2009. Licence Application for the Port Hope Long-Term Low-Level Radioactive Waste Management Project - Information Presented for the One Day CNSC Public Hearing (2009 August 26). Port Hope Project 4501-508760-LP-001 Revision 0. CMD 09-H9.1
- AECL, 2009. Licence Manual – Information in Support of Port Hope Long-Term Low Level Radioactive Waste Management Project Licence Application. PHAI Port Hope Project 4501-508760-MAN-001. Revision 1.
- AECL, 2009. Environmental Assessment Follow-up Program Plan Port Hope Project.

Hardy Stevenson and Associates Limited
AECL Application for the Waste Nuclear Substance Licence
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AECL, 2008. Assessment of Water Treatment Requirements and Options. PHAI Port Hope Project.
4501-121256-021-000.

CNSC, 2009. Information and Recommendations from the Canadian Nuclear Safety Commission
Staff. Application for a Waste Nuclear Substance Licence to operate a long-term low-level
waste management facility in Port Hope, Ontario. CMD 09-H9

J. R. Walker, 2009. AECL, letter to M. Stevenson, Re: AECL Response to Comments on the Port
Hope Project Licensing Manual (Revision 0). Dated July 10, 2009.

Thank-you,



Dave Hardy, RPP

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