

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 5055-BCGL97

Issue Date: June 19, 2019

409315 Ontario Limited
923590 Road 92
Zorra, Ontario
N0J 1J0

Site Location: 316489 Line 31 Embro; and
923590 Road 92, Embro
Township of Zorra, County of Oxford, Ontario

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act , R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

Modifications and addition of sewage treatment and subsurface disposal systems, having a Rated Capacity of 50,000 litres per day, serving seventy-two (72) units of year-round mobile home sites at retirement village, located at 316489 Line 31, in the Town of Zorra, consisting of the following:

Retirement Village Sewage System - Serving 72 Mobile Home Sites

- Three (3) existing septic tanks, each with capacity of 22,500 litres, 15,890 litres and 15,890 litres, respectively, providing a total septic tank capacity of 54,280 litres, all eventually discharging into an existing WSB Clean Pro sewage treatment unit;
- one (1) existing WSB Clean Pro sewage treatment unit with a design capacity of 50,000 litres per day, comprising the following:
 - one (1) two-compartment sludge storage tank/primary clarifier tank, having a minimum working capacity of 27,200 litres;
 - two (2) bioreactor reactors #1 and #2, operating in series, with minimum total working capacity of 36,320 litres, equipped with 11.5 cubic metres of Biofilm carrier media, fine bubble diffuser aeration systems, air compressors, and effluent recirculation pumps;
 - one (1) final settling tank with two slope-walled hoppers, having a minimum working capacity of 27,200 litres, complete with two (2) sludge pumps, one (1) skimmer assembly with a sludge pump, returning sludge/scum to the sludge storage tank, and discharging effluent to an existing 4,500 litre pump/dosing chamber;
- one (1) new 27,000 pump/dosing chamber, equipped with duplex time controlled

pumps, discharging via a 50 millimetre diameter forcemain into a new Shallow Buried Distribution Trench Subsurface Disposal Bed with a discharge rate 2 litres per second at a Total Dynamic Head (TDH) of 23.6 metres;

- one (1) new Shallow Buried Trench Subsurface Disposal Bed consisting of two (2) six-outlet flow splitters and infiltration chambers with a total length of 1008 metres arranged in two (2) zones, each zone consisting of six (6) cells, each with six (6) runs of 14 metre long Infiltrator Equalizer 24 Chambers spaced at a minimum centre-line distance of 2.0 metres, each run of infiltration chamber installed at a maximum depth of 0.6 metre below finished grade and each equipped with a 25 millimetre diameter pressurized perforated pipe, including a contaminant attenuation zone within 100 metres of this Shallow Buried Trench Subsurface Disposal Bed, located at an adjacent property: Happy Hills Resort, 923590 Road 92 Embro, Township of Zorra, ON;
- all other controls, electrical equipment, instrumentation, piping, valves and appurtenances essential for the proper operation of the aforementioned sewage Works;

all in accordance with the supporting documents set out in Schedule "A" attached to this Approval.

For the purpose of this environmental compliance approval, the following definitions apply:

1. "CBOD5" means five day carbonaceous (nitrification inhibited) biochemical oxygen demand measured in an unfiltered sample;
2. "Director" means a person appointed by the Minister pursuant to Section 5 of the EPA for the purposes of Part II.1 of the EPA;
3. "Grab Sample" means an individual sample of at least 1000 millilitres collected in an appropriate container at a randomly selected time over a period of time not exceeding 15 minutes;
4. "District Manager" means the District Manager of the London District Office;
5. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
6. "Equivalent Equipment" means a substituted equipment or like-for-like equipment that meets the required quality and performance standards of a named equipment;
7. "Licensed Installer" means a person who holds a licence under Article 2.12.3.1 of the Ontario Building Code;

8. "Ministry" means the ministry of the government of Ontario responsible for the EPA and OWRA and includes all officials, employees or other persons acting on its behalf;
9. "OBC" means the Ontario Building Code;
10. "Owner" means 409315 Ontario Limited and its successors and assignees;
11. "OWRA" means the *Ontario Water Resources Act*, R.S.O. 1990, c. O.40, as amended;
12. "Rated Capacity" means design daily sanitary sewage flow for which the Works are approved to handle;
13. "Professional Engineer" means a person entitled to practice as a Professional Engineer in the Province of Ontario under a licence issued under the Professional Engineers Act;
14. "Single Sample Concentration" means the concentration of a parameter in the effluent discharged on any day, as measured by a probe, analyzer or in a composite or grab sample, as required;
15. "Works" means the sewage works described in the Owner's application and this Approval.

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1. GENERAL PROVISIONS

1. The Owner shall ensure that any person authorized to carry out work on or operate any aspect of the Works is notified of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
2. Except as otherwise provided by these conditions, the Owner shall design, build, install, operate and maintain the Works in accordance with the description given in this Approval, and the application for approval of the Works.
3. Where there is a conflict between a provision of any document in the schedule referred to in this Approval and the conditions of this Approval, the Conditions in this Approval shall take precedence, and where there is a conflict between the documents in the schedule, the document bearing the most recent date shall prevail.

4. Where there is a conflict between the documents listed in the Schedule submitted documents, and the application, the application shall take precedence unless it is clear that the purpose of the document was to amend the application.
5. The Conditions of this Approval are severable. If any Condition of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid or unenforceable, the application of such condition to other circumstances and the remainder of this Approval shall not be affected thereby.

2. EXPIRY OF APPROVAL

1. This Approval will cease to apply to those parts of the Works which have not been constructed within five (5) years of the date of this Approval.

3. CHANGE OF OWNER

1. The Owner shall notify the District Manager and the Director, in writing, of any of the following changes within thirty (30) days of the change occurring:

- a. change of Owner;
- b. change of address of the Owner;
- c. change of partners where the Owner is or at any time becomes a partnership, and a copy of the most recent declaration filed under the *Business Names Act*, R.S.O. 1990, c.B17 shall be included in the notification to the District Manager;
- d. change of name of the corporation where the Owner is or at any time becomes a corporation, and a copy of the most current information filed under the *Corporations Information Act*, R.S.O. 1990, c. C39 shall be included in the notification to the District Manager;

2. In the event of any change in ownership of the Works, other than a change to a successor municipality, the Owner shall notify in writing the succeeding owner of the existence of this Approval, and a copy of such notice shall be forwarded to the District Manager and the Director.

4. CONSTRUCTION

1. The Owner shall ensure that the construction of the Works is supervised by a licensed installer or a Professional Engineer, as defined in the *Professional Engineers Act*.
2. The Owner shall ensure that the WSB Clean Pro Sewage Treatment Units are

installed in accordance with the Manufacturer's Installation Manual.

3. Upon construction of the Works, the Owner shall prepare a statement, certified by a licensed installer or a Professional Engineer, that the Works are constructed in accordance with this Approval, and upon request, shall make the written statement available for inspection by Ministry staff.
4. Upon construction of the Works, the Owner shall prepare a set of as-built drawings showing the works "as constructed", which shall be kept up to date through revisions undertaken from time to time and a copy shall be retained at the site for the operational life of the Works.
5. The Owner shall decommission existing on-site sewage system to the satisfaction of the District Manager and upon completion report in writing to the District Manager.

5. EFFLUENT OBJECTIVES

1. The Owner shall use best efforts to design, construct and operate the Works with the objective that the concentrations of the materials named as effluent parameters in the Effluent Objectives Table (Table 1) listed in **Schedule B** are not exceeded in the effluent being discharged to the Shallow Buried Trench Subsurface Disposal Bed.
2. The Owner shall ensure that flow of treated effluent discharged into the subsurface sewage system does not exceed the balanced Rated Capacity of 50,000 litres per day.

6. EFFLUENT LIMITS

1. The Owner shall design, construct, operate and maintain the Works such that the concentrations of the materials named as effluent parameters in the Effluent Limits Table (Table 2) in **Schedule B** are not exceeded in the effluent from the WSB Clean Pro sewage treatment unit prior to discharging into Shallow Buried Trench Subsurface Disposal Bed.
2. For the purposes of determining compliance with and enforcing subsection (1), the Single Sample Concentration of CBOD5 and TSS named in Column 1 shall not exceed the corresponding maximum concentration set out in Column 2 of Effluent Limits Table (Table 2) listed in **Schedule B**.

7. OPERATIONS AND MAINTENANCE

1. The Owner shall prepare an operations manual within six (6) months of the introduction of sewage to the Works, that includes, but not necessarily limited to, the following information:

- a. operating procedures for routine operation of all the Works;
 - b. inspection programs, including frequency of inspection, for all the Works and the methods or tests employed to detect when maintenance is necessary;
 - c. repair and maintenance programs, including the frequency of repair and maintenance for all the Works; copies of maintenance contracts for any routine inspections & pump-outs should be included for all the tanks and treatment units;
 - d. procedures for the inspection and calibration of monitoring equipment;
 - e. a spill prevention control and countermeasures plan, consisting of contingency plans and procedures for dealing with equipment breakdowns, potential spills and any other abnormal situations, including notification of the District Manager; and
 - f. procedures for receiving, responding and recording public complaints, including recording any follow-up actions taken.
2. The Owner shall maintain the operations manual current and retain a copy at the location of the Works for the operational life of the Works. Upon request, the Owner shall make the manual available to Ministry staff.
 3. The Owner shall prepare and make available for inspection by Ministry staff, a maintenance agreement with the manufacturer for the treatment process/technology and a complete set of "as constructed" drawings within one (1) year of Substantial Completion of the Works. The maintenance agreement and drawings must be retained at the site and kept current.
 4. The Owner shall ensure that all septic tanks are pumped out every 3-5 years or when the tank is 1/3 full of solids and the effluent filters are cleaned out at minimum once a year or more often if required.
 5. The Owner shall ensure that grass-cutting is maintained regularly over all the subsurface disposal beds, and the drainage operations in all beds are visually observed on a monthly basis. In the event a break-out is observed from a subsurface disposal bed, the Owner shall ensure that the sewage discharge to the bed is discontinued and the incident immediately reported verbally to the District Manager, followed by a written report within one (1) week. The Owner shall ensure that during the time remedial actions are taking place the sewage generated at the site shall not be allowed to discharge to a surface water body or to the environment, and safely collected and disposed off through a licensed waste hauler to an approved waste disposal site.

6. The Owner shall ensure that adequate steps are taken to ensure that the area of the Works are protected from all forms of vehicle traffic.
7. The Owner shall employ for the overall operation of the Works a person who possesses the level of training and experience sufficient to allow safe and environmentally sound operation of the Works.

8. MONITORING AND RECORDING

The Owner shall, upon commencement of operation of the Works, carry out the following monitoring program:

1. All samples and measurements taken for the purposes of this Approval are to be taken at a time and in a location characteristic of the quality and quantity of the effluent stream over the time period being monitored.
2. Samples shall be collected at the sampling point(s), at the sampling frequencies and using the sample type specified for each parameter listed in the Effluent Monitoring Table (Table 3) included in **Schedule B**.
3. Samples shall be collected at the sampling point(s), at the sampling frequencies and using the sample type specified for each parameter listed in the Surface Water Monitoring Table (Table 4) included in **Schedule B**.
4. The Owner shall employ any measurement devices to accurately measure quantity of effluent being discharged to each individual subsurface disposal system, including but not limited to water/wastewater flow meters, event counters, running time clocks, or electronically controlled dosing, and shall record the daily volume of effluent being discharged to the subsurface disposal system.
5. The methods and protocols for sampling, analysis and recording shall conform, in order of precedence, to the methods and protocols specified in the following documents and all analysis shall be conducted by a laboratory accredited to the ISO/IEC:17025 standard or as directed by the District Manager:
 - a. the Ministry's Procedure F-10-1, "Procedures for Sampling and Analysis Requirements for Municipal and Private Sewage Treatment Works (Liquid Waste Streams Only), as amended from time to time by more recently published editions;
 - b. the Ministry's publication "Protocol for the Sampling and Analysis of Industrial/Municipal Wastewater Version 2.0" (January 2016), PIBS 2724e02, as amended from time to time by more recently published editions; and
 - c. the publication "Standard Methods for the Examination of Water and Wastewater" (21st edition), as amended from time to time by

more recently published editions.

6. The measurement parameters, frequencies and locations specified in subsections 2 and 3 in respect to any parameter are minimum requirements which may, after **one (1) year** of monitoring in accordance with this Condition, be modified by the Director in writing from time to time when approved by District Manager upon reviewing annual monitoring and performance report.
7. The Owner shall retain for a minimum of five (5) years from the date of their creation, all records and information related to or resulting from the monitoring activities required by this Approval.

9. Certificate of Requirement

1. Pursuant to Section 103 of the OWRA, no person having an interest in the Property, shall deal with the Property in any way without first giving a copy of this Approval to each person acquiring an interest in the Property as a result of the dealing.
2. The Owner shall:
 - a. within sixty (60) days of the date of the issuance of this Approval, submit to the Director for their review, two copies of a completed Certificate of Requirement and a registerable description of the Property; and
 - b. within ten (10) calendar days of receiving the Certificate of Requirement authorized by the Director, register the Certificate of Requirement in the appropriate Land Registry Office on title to the Property and submit to the Director the duplicate registered copy immediately following registration.
3. For the purposes of this condition, Property shall mean the property located at Happy Hills Resort, 923590 Road 92 Embro, Township of Zorra, ON.
4. Any modification of the land cover and topography is not allowed within the contaminant attenuation zone of Shallow Buried Trench Subsurface Disposal Bed.

10. FINANCIAL ASSURANCE

1. Within 90 days of issuance of this Approval the Owner shall submit to the Director, Financial Assurance, as defined in Section 131 of the Act, for the amount of Fifty-four thousand dollars (\$54,000). This Financial Assurance shall be in a form acceptable to the Director and shall provide sufficient funds to pay for the

compliance with and performance of any action specified in this Approval including the clean-up, monitoring and post closure care of the Works.

2. Commencing on July 31, 2024 and at intervals of five (5) years thereafter, the Owner shall submit to the Director, a re-evaluation of the amount of Financial Assurance to implement the actions required under Subsection (1). The re-evaluation shall include an assessment based on any new information relating to the environmental conditions of the Works and shall include the costs of additional monitoring and/or implementation of contingency plans required by the Director upon review of the closure plan and annual reports. The Financial Assurance must be submitted to the Director within ten (10) days of written acceptance of the re-evaluation by the Director:
3. Commencing on July 31, 2020, the Owner shall prepare and maintain at the Works an updated re-evaluation of the amount of Financial Assurance required to implement the actions required under Subsection (1) for each of the intervening years in which a re-evaluation is not required to be submitted to the Director under Subsection (2). The re-evaluation shall be made available to the Ministry, upon request.
4. The amount of Financial Assurance is subject to review at any time by the Director and may be amended at his/her discretion. If any Financial Assurance is scheduled to expire or notice is received, indicating Financial Assurance will not be renewed, and satisfactory methods have not been made to replace the Financial assurance at least sixty (60) days before the Financial Assurance terminates, the Financial Assurance shall forthwith be replaced by cash.

11. REPORTING

1. One week prior to the start up of the operation of the Works, the Owner shall notify the District Manager (in writing) of the pending start up date.
2. In addition to the obligations under Part X of the *Environmental Protection Act*, the Owner shall, within 10 working days of the occurrence of any reportable spill as defined in Ontario Regulation 675/98, loss of any product, by-product, intermediate product, oil, solvent, waste material or any other polluting substance into the environment, submit a full written report of the occurrence to the District Manager describing the cause and discovery of the spill or loss, clean-up and recovery measures taken, preventative measures to be taken and schedule of implementation.
3. The Owner shall, upon request, make all manuals, plans, records, data, procedures and supporting documentation available to Ministry staff.
4. The Owner shall prepare and submit a performance report, on an annual basis, within ninety (90) days following the end of each operational season to the District

Manager. The first such report shall cover the first annual period following the commencement of operation of the Works and subsequent reports shall be submitted to cover successive annual periods following thereafter. The reports shall contain, but shall not be limited to, the following information:

- a. a summary and description of efforts made and results achieved in meeting the Effluent Objectives of (Condition 5);
- b. a summary and interpretation of all monitoring data and a comparison to the Effluent Limits (Condition 6) including an overview of the success and adequacy of the Works, and a Contingency Plan in the event of not in compliance with the Effluent Limits.
- c. a summary and interpretation of surface water monitoring data. For the first report year, the report shall include a professional opinion on whether the ministry's guidelines ("Deriving Receiving Water Based, Point-Source Effluent Requirements for Ontario Waters") with respect to assimilative capacity are being satisfied. The report shall identify whether modifications to the system or additional treatment are necessary. The report may include a recommendation for modification to the either the frequency and/or the locations of monitoring from surface water.
- d. a review and assessment of performance of sewage works, including all treatment units and disposal beds;
- e. a description of any operating problems encountered and corrective actions taken at all sewage Works located at the property;
- f. a record of all maintenance carried out on any major structure, equipment, apparatus, mechanism or thing forming part of all Works located at the property including but not limited to: records of maintenance inspections for WSB Clean Pro treatment unit, records of septic tank pump-outs, records of septic tank effluent filters cleaning, records of septic tank pump-outs, records of sludge pump-outs accumulated from the treatment system, records of visual inspections of all disposal systems;
- g. a summary of any effluent quality assurance or control measures undertaken in the reporting period;
- h. a summary and interpretation of all daily flow data and results achieved in not exceeding the maximum daily sewage flow discharged into each one of the subsurface disposal system;

- i. a summary of any complaints received during the reporting period and any steps taken to address the complaints;
- j. a summary of all spill or abnormal discharge events; and
- k. any other information the District Manager requires from time to time.

Schedule A

1. Application for Environmental Compliance Approval dated September 30, 2016 and May 16, 2018 and submitted by William John Baker, President of 409315 Ontario Limited, for the proposed modification and upgrade to sewage treatment and subsurface disposal systems, including design brief, hydrogeological assessment, final plans and specifications.

Schedule B

Table 1 - Effluent Objectives Table

Effluent Parameter	Monthly Average Concentration Objectives (milligrams per litre unless otherwise indicated)
CBOD5	10.0
Total Suspended Solids	10.0

Table 2 - Effluent Limits Table

Effluent Parameter	Monthly Average Concentration Limits (milligrams per litre unless otherwise indicated)
<i>Column 1</i>	<i>Column 1</i>
CBOD5	20.0
Total Suspended Solids	20.0

Table 3 - Effluent Monitoring Table

Sample locations	Treated effluent from the WSB Clean Pro sewage treatment unit, prior to discharging into Shallow Buried Trench system
Frequency	Once per month
Sample Type	Grab
Parameters	CBOD5, Total Suspended Solids, Total Phosphorus, and Nitrate Nitrogen

Table 4 - Surface Water Monitoring Table

Sample location	Five Sample Stations as identified in Figure 1 dated November 2018 prepared by R. J. Burnside Associates
Frequency	Once per month from May to October
Sample Type	Grab
Parameters	Soluble Reactive Phosphorus, and Nitrate Nitrogen

The reasons for the imposition of these terms and conditions are as follows:

1. Condition 1 is imposed to ensure that the Works are built and operated in the manner in which they were described for review and upon which approval was granted. This condition is also included to emphasize the precedence of Conditions in the Approval and the practice that the Approval is based on the most current document, if several conflicting documents are submitted for review. The condition also advises the Owners their responsibility to notify any person they authorized to carry out work pursuant to this Approval the existence of this Approval.
2. Condition 2 is included to ensure that, when the Works are constructed, the Works will meet the standards that apply at the time of construction to ensure the ongoing protection of the environment.
3. Condition 3 is included to ensure that the Ministry records are kept accurate and current with respect to the approved works and to ensure that subsequent owners of the Works are made aware of the Approval and continue to operate the Works in compliance with it.
4. Condition 4 is included to ensure that the works are constructed, and may be operated and maintained such that the environment is protected and deterioration, loss, injury or damage to any person or property is prevented.
5. Condition 5 is imposed to establish non-enforceable effluent quality objectives which the Owner is obligated to use best efforts to strive towards on an ongoing basis. These objectives are to be used as a mechanism to trigger corrective action proactively and voluntarily before environmental impairment occurs.
6. Condition 6 is imposed to ensure that the effluent discharged from the Works to the groundwater meets the Ministry's effluent quality requirements thus minimizing environmental impact on the receiver.
7. Condition 7 is included to require that the Works be properly operated, maintained, and equipped such that the environment is protected. As well, the inclusion of an operations manual, maintenance agreement with the manufacturer for the treatment process/technology and a complete set of "as constructed" drawings governing all significant areas of operation, maintenance and repair is prepared, implemented and kept up-to-date by the owner and made available to the Ministry. Such information is an integral part of the operation of the Works. Its compilation and use should assist the Owner in staff training, in proper plant operation and in identifying and planning for contingencies during possible abnormal conditions. The manual will also act as a benchmark for Ministry staff when reviewing the Owner's operation of the work.

8. Condition 8 is included to enable the Owner to evaluate and demonstrate the performance of the Works, on a continual basis, so that the Works are properly operated and maintained at a level which is consistent with the design objectives specified in the Approval and that the Works does not cause any impairment to the receiving watercourse.

9. Condition 9 is included in order to require the Owner to give notice of this Approval to potential future owners of the property before the property is dealt with.

10. Condition 10 is included to ensure that the Owner provides financial assurance on a timely basis, in an amount adequate to cover the capital and operating costs of the environmental measures for which it is provided and is in a form readily used by Ministry personnel.

11. Condition 11 is included to provide a performance record for future references, to ensure that the Ministry is made aware of problems as they arise, and to provide a compliance record for all the terms and conditions outlined in this Approval, so that the Ministry can work with the Owner in resolving any problems in a timely manner.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 3-1518-98-006 issued on November 12, 1998.

In accordance with Section 139 of the Environmental Protection Act, you may by written Notice served upon me, the Environmental Review Tribunal and in accordance with Section 47 of the Environmental Bill of Rights, 1993, the Minister of the Environment, Conservation and Parks, within 15 days after receipt of this Notice, require a hearing by the Tribunal. The Minister of the Environment, Conservation and Parks will place notice of your appeal on the Environmental Registry. Section 142 of the Environmental Protection Act provides that the Notice requiring the hearing shall state:

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

Pursuant to subsection 139(3) of the Environmental Protection Act, a hearing may not be required with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

The Notice should also include:

1. The name of the appellant;

2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

The Secretary* Environmental Review Tribunal 655 Bay Street, Suite 1500 Toronto, Ontario M5G 1E5	AND	The Minister of the Environment, Conservation and Parks 777 Bay Street, 5th.Floor Toronto, Ontario M7A 2J3	AND	The Director appointed for the purposes of Part II.1 of the Environmental Protection Act Ministry of the Environment, Conservation and Parks 135 St. Clair Avenue West, 1st Floor Toronto, Ontario M4V 1P5
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*** Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 326-5370 or www.ert.gov.on.ca**

This instrument is subject to Section 38 of the Environmental Bill of Rights, 1993, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at www.ebr.gov.on.ca, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the Environmental Protection Act.

DATED AT TORONTO this 19th day of June, 2019

Youssouf Kalogo, P.Eng.
Director
appointed for the purposes of Part
II.1 of the *Environmental
Protection Act*

NH/
c: District Manager, MECP London - District
Katherine Rentsch, R.J. Burnside Associates