



File / dossier : 6.01.07

Date: 2020-10-22

Edocs: 6406112

**Written submission from the
Ontario Association of Demolition
Contractors**

**Mémoire de l'Ontario Association
of Demolition Contractors**

In the Matter of the

À l'égard de

**Canadian Nuclear Laboratories,
Douglas Point Waste Facility**

**Les Laboratoires Nucléaires Canadiens,
installation de gestion des déchets de
Douglas Point**

Application to amend the waste facility
decommissioning licence for the Douglas
Point Waste Facility

Demande de modification du permis de
déclassement de l'installation de gestion des
déchets de Douglas Point

Commission Public Hearing

Audience publique de la Commission

November 25-26, 2020

25 et 26 novembre 2020

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October 22, 2020

Canadian Nuclear Safety Commission (CNSC)
280 Slater Street
P.O. Box 1046
Ottawa, ON K1P 5S9

Dear Sirs/Madams,

We are writing to you today on behalf of the Ontario Association of Demolition Contractors (OADC), in support of the recommendation to the Canadian Nuclear Safety Commission (CNSC) to approve the Canadian Nuclear Laboratories Limited (CLN)'s submission. This submission pertains to the amendment of the Douglas Point Waste Facility (DPWF) Decommissioning Licence to proceed with Phase 3 Decommissioning involving dismantling and demolition of all remaining facilities of the DPWF.

The Ontario Association of Demolition Contractors (OADC) is a powerful voice in the demolition and abatement industry. Since 1976, we have represented member companies of all sizes who have signed the Demolition Collective Agreement with the Labourers' International Union of North America (LiUNA). OADC member companies are tier-one providers of demolition and abatement services in the construction sector, consistently chosen to work on projects that demand highly trained, safety aware industry professionals. The OADC represents more than 80 Contractors province wide, for which their employees work over 2.6 Million man-hours per year.

OADC Members have extensive knowledge and have handled dozens of demolition and abatement projects throughout the years at the Bruce, Pickering, & Darlington Nuclear Generation Stations. In addition to the Generating Stations, our Members have also worked exclusively at Chalk River Laboratories and at the Port Hope Conversion Facility.

"OADC members adhere to the highest industry standards and are preferred and valued on all demolition and abatement projects."

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"OADC supports the interests of our members. We advocate for clear, fair and functional legislation which develops, maintains and sustains a positive and proactive relationship with the Labourers' International Union of North America and the Ontario Provincial District Council."



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OADC Member's hold at their core, a high value for health & safety. In 2019 the OADC's Labour/Management Demolition Working Group received the Gil Sampson Award from the Infrastructure Health & Safety Association (IHSA). *Inspired by Mr. Samson's contribution to accident prevention, a donor established a fund to honour Gil Samson and to recognize similar contributions towards accident prevention made by a Labour-Management Health and Safety Committee.*

The OADC also works closely with the Ministry of Labour, Training and Skills Development (MLTSD). OADC Member's Labour force is fully certified and have received training in the Hazardous Material Worker (253H) Program. This program is offered at two different Training Delivery Agencies (TDA's) approved by the MLTSD; LiUNA Local 506 in Toronto, ON and LiUNA Local 1059 in London, ON. This program is crucial when working in Nuclear facilities, as it clearly provides training on how to identify, remove and dispose safely of hazardous material and hazardous material waste.

In closing, we urge you approve this recommendation in order to help minimize and consolidate Canada's nuclear waste. Along with this action, you will continue to protect our environment all while providing long term jobs to our Member's work force.

We truly thank you for your time and consideration of this request.

If you should have any questions or concerns, please feel free to contact the undersigned.

Warmest regards,

Margaret Taylor, Executive Director

mtaylor@oadc.ca

cc: Carmelo Pastore, OADC President, Delsan-AIM Environmental Services Inc.

cc: Brian Priestly, OADC Vice-President, Priestly Demolition Inc.

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