

July 6, 2020

Mr. David Welwood  
Principal Planner  
Planning, Development & Legislative Services  
Region of Waterloo

Project No.: 241.20013.00000

Dear Mr. Welwood,

**RE: FINAL PEER REVIEW OF BEST MANAGEMENT PRACTICES PLAN FOR CONTROL OF FUGITIVE DUST EMISSIONS  
PROPOSED HALLMAN PIT – WILMOT TOWNSHIP**

SLR Consulting (Canada) Ltd. (SLR) was retained by the Region of Waterloo to conduct a peer review of the Best Management Practices Plan (BMPP) for the proposed Hallman Pit operations.

**DOCUMENTS REVIEWED**

SLR previously provided comments in a letter “Peer Review of the Dust Best Management Practices Plan (BMPP)”, dated February 27, 2020 (“February BMPP”). A review of the following documents that were prepared in response by GHD was conducted:

- Response to Comments to letter dated February 27, 2020 Peer Review of Dust Best Management Practices Plan, 2019 Proposed Hallman Pitt – 1894 Witmer Road, Wilmot Township, prepared by GHD dated April 9<sup>th</sup>, 2020 (“Response Letter”).
- Best Management Practices Plan for Control of Fugitive Dust Emissions, Revision 1, prepared by GHD dated April 9<sup>th</sup>, 2020 (“Revised BMPP”).

The following application and supporting documents were also considered in the review:

- Planning Summary Report, Proposed Hallman Pit, 1894 Witmer Road, Wilmot Twp., prepared by IBI group, dated October 11, 2019 (Planning Report);
- Township of Wilmot Official Plan, April 19, 2019;
- Aggregate Resources Act, R.S.O. 1990, Chapter A.8, Ministry of Natural Resources and Forestry;
- Technical Bulletin – Management Approaches for Industrial Fugitive Dust Sources, MECP, February 2017;
- Government of Canada Pits and Quarries Reporting Guide, 2017.

**COMMENTS**

SLR provided peer review comments on the February 27, 2020 BMPP Report. Changes and updates were made to the design and plans based on the comments provided by SLR. The following summarizes the key issues raised by SLR and a summary of the response to the issues addressed by GHD:

1. The February BMPP did not outline controls that would be placed on the central processing plant equipment.

**GHD Response:**

The central processing plant including the main crusher and screening equipment will be equipped with spray bars. The BMPP was updated to include these details. If required additional controls will be included in the BMPP and onsite. The presence of visible dust will be pre-assessed based on expected weather forecasts and assessed on a daily basis and the watering rate may be adjusted, as required.

SLR has determined this to be sufficient and have no further comments.

2. The February BMPP did not outline controls that would be employed at the portal crusher in the recycling area, as well as address times the central processing plant may operate at the same time as the portable crusher.

**GHD Response:**

The central processing plant including the main crusher and screening equipment will be equipped with spray bars. The BMPP was updated to include these details. During the times per year that the central plant and recycling crusher will operate at the same time, the presence of visible dust will continue to be assessed on a daily basis and additional water suppressants may be applied, as needed.

SLR has determined this to be sufficient and have no further comments.

3. The February BMPP did not outline controls that would be employed for the conveyor transfer of materials onsite.

**GHD Response:**

Outlined in the Revised BMPP, plant technical staff will assess the daily operations and the weather conditions and will be able to adjust control measures, as necessary.

SLR has determined this to be sufficient and have no further comments.

4. The February BMPP did not outline over which temperatures or wind speeds would require water application to the stockpiles.

**GHD Response:**

The Revised BMPP now outlines that if the temperature is greater than 20 degrees Celsius (°C) and wind speeds are in excess of 5 metres per second (m/s), additional visual inspection of dust conditions will occur. Weather forecasts will be reviewed daily and water suppressant may be applied, as needed, based on the dust conditions observed.

SLR has determined this to be sufficient and have no further comments.

5. It was SLR's opinion that the February BMPP did not provide sufficient details on the watering program of the unpaved roadways. A once per day inspection may not be sufficient.

**GHD Response:**

The Revised BMPP now outlines that if the temperature is greater than 20 degrees Celsius (°C) and wind speeds are in excess of 5 m/s, process inspections will occur twice per day.

SLR has no further comments.

The Revised BMPP report for the proposed Hallman Pit has provided the further information requested as outlined above. It is SLR's opinion that the Revised BMPP illustrates that operations will be mitigated to an acceptable level as per the Township of Wilmot Official Plan Policy 7.2.4.1a. GHD has indicated that the Dust BMPP will be a "living" document that will be assessed based on the "as-constructed" site and from time-to-time, as necessary.

Yours sincerely,

**SLR Consulting (Canada) Ltd.**



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