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September 10, 2010

Mr. Jeremy Vink
Planner
Township of Woolwich
24 Church Street West
PO Box 158
Elmira, Ontario
N3B 2Z6

Dear Mr. Vink:

**PROPOSED JIGS HOLLOW PIT
KUNTZ TOPSOIL, SAND & GRAVEL LTD.**

Further to the peer review comments forwarded to our office and which were prepared by Valcoustics (John Emeljanow) dated August 24, 2010, we have had an opportunity to review the comments and provide the following response using the point numbers referred to in Valcoustic's letter for reference.

- 1) No comment.
- 2) We maintain that the MOE Area classification is as defined in NPC-205 and NPC-232.

The MOE classification definition references population and area characteristics; it does not reference ambient noise levels as the basis to set the classification. The Area Classification sets a minimum criteria for a particular class, but allows the criteria to increase if the ambient level is actually higher. In the Highway 401 example cited by Valcoustics, the area next to Highway 401 may still be defined as a Class 3 area (which sets the minimum criteria), however, as the ambient noise level would be dominated by the highway, and presumably be well above the minimum limits set by a Class 3 area, the ambient noise level could become the governing criteria.

Accordingly, as the subject receivers are within the community of Conestogo, and meet the MOE classification definition for a Class 2 area, we maintain that the Class 2 designation is appropriate.

- 3) The subject building located within the proposed Pit is planned to be used as the pit office. As such this building is a non noise sensitive use and noise mitigation is not required.
- 4) On-site truck movements were accounted for in the analysis. We have also updated the analysis to account for the new haul route and included Jigs Hollow Road (refer to attached Figure 1). Idling trucks and refuelling equipment have a noise profile less than that of hauling trucks and we would deem them also to be included in the analysis. However, we will add the following recommendation note to the Site Plans.

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New Noise Recommendation Note:

11. Truck idling within the pit shall be minimized whenever possible.

- 5) We are not aware of general MOE guidelines for off-site vehicles as it relates to noise. However, the MOE has prepared a draft document entitled "Noise Guidelines for Landfill Sites" dated October 1998 which state:

"Section 6 – Off-site vehicles

An access route for off-site vehicles shall be selected which will result in a minimum noise impact. The selection process shall be based on a detailed qualitative assessment of noise impact on individual receptors and the number of affected receptors along the alternative routes. The municipality and the affected residents must be clearly informed of any potential noise impact."

In preparation of the Aggregate Pit Plan the following review of the alternative routes was considered:

- Peel Street: Haul trucks (even empty) can not travel on Peel Street over the existing iron bridge that crosses the Grand River due to restrictive weight limitations on the structure.
- Jigs Hollow Road: North bound on Jigs Hollow is a gravel road traveling away from the main market for the sand and gravel, and as such this is not practical.
- Jigs Hollow Road: South/West bound is the shortest distance to get haul trucks to a regional road (Northfield Drive), and is the direction of travel to the main market area. Thus, this is the preferred route.

Please note that the Site Plans have been revised to extend the haul road through the site and avoid any use of Peel Street as an external haul road. The following recommendation will be added to the Site Plans to require the internal haul route to be maintained in good condition to reduce noise:

New Noise Recommendation Note:

12. Internal haul roads shall be maintained in good condition to minimize truck noise.

CadnaA was used to model the noise from the haul route. The noise level assuming five (5) trucks per hour is 45dBA at 33 metres. The closest receiver to the haul route is 95 metres with a predicted noise level of 38.9 dBA. As such, haul truck noise is well within MOE limits.

- 6) No comment.
- 7) Please refer to Notes 8 and 13 of the Site Plans.
8. THAT PRIOR TO THE COMMENCEMENT OF OPERATIONS AND TWICE ANNUALLY THE PIT OPERATOR SHALL MONITOR THE NOISE LEVELS AT ALL THE RECEIVER LOCATIONS TO ENSURE NOISE LEVELS ARE KEPT WITHIN THE ESTABLISHED CRITERIA. ALL MONITORING MUST BE CONDUCTED BY A QUALIFIED

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ACOUSTICAL ENGINEER AND SHALL FOLLOW THE GUIDELINES AND SPECIFICATIONS OUTLINED IN NPC 233 "INFORMATION TO BE SUBMITTED FOR APPROVAL OF STATIONARY SOURCES OF SOUND". AN ANNUAL REPORT MUST BE ISSUED TO THE MINISTRY OF THE ENVIRONMENT (MOE) AND MINISTRY OF NATURAL RESOURCES (MNR) **AND THE TOWNSHIP OF WOOLWICH.**

13. IF NEW OR ALTERNATE EQUIPMENT IS TO BE USED AT THE SITE, SOUND EMISSION LEVELS OF ALL EQUIPMENT TO BE USED AT THE SITE WILL BE MEASURED TO CONFIRM THEY DO NOT EXCEED THOSE USED IN THE ACOUSTICAL STUDY OR IN NPC-115 IF THE EQUIPMENT IS BEING USED FOR CONSTRUCTION ONLY. IF THE SOUND EMISSION LEVELS USED IN THE NOISE ASSESSMENT ARE EXCEEDED, EITHER DIFFERENT EQUIPMENT MEETING THE EMISSION LEVELS FROM THE NOISE ASSESSMENT WILL BE USED OR ADDITIONAL NOISE MITIGATION MEASURES SHOULD BE PROVIDED. A COPY OF THE INTERIM NOISE MONITORING REPORTS WILL BE SUBMITTED TO MOE, MNR AND THE TOWNSHIP OF WOOLWICH WITHIN 30 DAYS OF COMPLETING THE MONITORING. IF ADDITIONAL EQUIPMENT BEYOND THAT OUTLINED IN THE ACOUSTICAL STUDY IS TO BE USED ON THE SITE, THE ACOUSTICAL STUDY MUST BE UPDATED AND RE-SUBMITTED TO MOE, MNR AND THE TOWNSHIP FOR REVIEW AND COMMENT PRIOR TO THE EQUIPMENT OPERATING ON THE SITE.

8) Attached hereto is a CD with all the CadnaA files.

We trust that this information is satisfactory and addresses your comments.

Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Yours truly

IBI GROUP



Trevor O'Brien, B.Eng
Engineer in Training



John Perks, P.Eng, MBA
Associate, Principal – Engineering

TO/JP/baw

Encl. Figure 1
CD – CadnaA Files

cc: Ray Kuntz, Kuntz Topsoil, Sand & Gravel Ltd.
John Emeljanow, Valcoustics

