

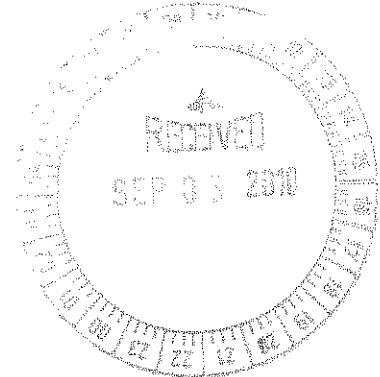


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September 3, 2010

Mr. Jeremy Vink
Planner
Township of Woolwich
24 Church Street West
PO Box 158
Elmira, Ontario
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Dear Mr. Vink:

**PEER REVIEW COSTS
HUNDER DEVELOPMENT - PROPOSED HUNSBERGER PIT**

Further to the peer review comments by AMEC (Tony van der Vooren) dated August 3, 2010, please note that SENES (James Young Ph.D.) has had subsequent discussions with Mr. van der Vooren and as such we provide the following to address his outstanding comments.

- A) AMEC Table 1, item 1 (un-numbered): It is AMEC's preference that the 'Best Management Practices' (BMP) not be specified on the Site Plans on the basis that MOE may request changes, thus involving an ARA Site Plan Amendment. As such, Notes 2-6 of the previous Dust Recommendations have been deleted.

However, as a result of recent MOE policy interpretations, C of A's will no longer be required for most pit processing equipment when it is positioned below grade, and SENES has relayed this verbally to AMEC. Therefore, in order to ensure that the BMP's are enforced (through MNR) yet could be amended (if required) without a Site Plan Amendment, (as recommended by AMEC); we are recommending that the Site Plans make reference to the specific SENES BMP document (attached hereto).

As such, the following note revision is being made:

1. **DUST MITIGATION ACTIVITIES ON SITE MUST MEET OR EXCEED THOSE SPECIFIED IN THE DUST MANAGEMENT PLAN DATED SEPTEMBER 2, 2010, PREPARED BY SENES CONSULTING LTD.**

- B) AMEC Table 1, item 2 (un-numbered): Regarding the requirement for a MOE Certificate.

As noted above, MOE will no longer be issuing Certificates of Approval for most pit processing equipment and as such, this note is to be deleted.

- C) AMEC Table 2 - Item 3: Placing a maximum processing limit which includes recycling.

To address this, General Operational Site Plan Note 1 has been revised as follows:

1. **IT IS A CONDITION OF THIS LICENCE THAT NO MORE THAN 500,000 TONNES OF MATERIAL SHALL BE REMOVED FROM THIS LICENSED PROPERTY ANNUALLY AND NO MORE THAN 2,700 TONNES/DAY OF MATERIAL (INCLUDING RECYCLED) SHALL BE PROCESSED.**

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D) AMEC Item 9/10: Providing off-site dust mitigation.

Since the proposed pit will egress onto a Regional Road, a Regional Entrance Permit will be required. The Region's minimum requirements for pit entrances, is for an acceleration lane consisting of a 50 metre parallel lane and a 70 metre taper (total 120 metres). With the basis of the 'off-site' dust issue being related to pit generated trucks potentially travelling (south) on the shoulder while achieving the posted speed, the required construction of the acceleration lane is expected to be adequate. However, to provide further mitigation, Hunder agrees to use a dust suppressant on the shoulder of Katherine Street from the end of the prescribed taper to Hunsberger Road. However, given that this is a Regional Road, such work cannot be undertaken without the Region's consent, and therefore, the following new Dust Recommendation Note is being added:

3. **THE LICENSEE SHALL APPLY A MOE APPROVED DUST SUPPRESSANT ALONG THE GRAVEL SHOULDER OF KATHERINE STREET FROM THE PIT ENTRANCE TO HUNSBERGER ROAD TWICE ANNUALLY IF REQUESTED BY THE REGION OF WATERLOO.**

E) AMEC Item 13: Access of Daily Inspection Records.

To address this, a new General Operational Site Plan Note 28 has been added as follows:

28. **ALL DAILY INSPECTION REPORTS REGARDING DUST SHALL BE MADE AVAILABLE TO THE MOE, MNR AND TOWNSHIP OF WOOLWICH UPON REQUEST.**

To summarize, the comprehensive list of revised notes that pertain to dust are as follows:

General Operational Notes:

1. It is a condition of this licence that no more than 500,000 tonnes of material shall be removed from this licensed property annually and no more than 2,700 tonnes/day of material (including recycled) shall be processed.
28. All daily inspection reports regarding dust shall be made available to the MOE, MNR and Township of Woolwich upon request.

Dust Impact Assessment (Senes Consultants):

1. Dust mitigation activities on site must meet or exceed those specified in the Dust Management Plan dated September 2, 2010, prepared by Senes Consulting Ltd.
2. The licensee must ensure that existing and proposed vegetation surrounding the pit is maintained to act as a barrier to dust transport. Specifically, the licensee shall ensure that the perimeter berms be sufficiently vegetated as follows:
 - o All berms shall be vegetated with a grass-type legume.
 - o Perimeter berms adjacent to off-site receptors (i.e., 310 Katherine Street, 1020, 1030 and 1040 Hunsberger Road, and 213, 219, 225 and 230 Golf Course Road) shall be planted with a grass-type legume as well as, either

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on the exterior of the berm or at the property limit, a selection of deciduous and coniferous trees and shrubs planted sufficiently so that a good screen is produced once all plants reach their ultimate height and spread.

3. The licensee shall apply a MOE approved dust suppressant along the gravel shoulder of Katherine Street from the pit entrance to Hunsberger Road twice annually if requested by the Region of Waterloo.

Please find attached hereto, two (2) hard copies of the Site Plans reflecting these note changes.

Should you have any questions, please do not hesitate to call.

Yours truly

IBI GROUP



David R. Sisco, BA, MCIP, RPP
Associate, Principal – Planning

DRS/baw
Encl.

cc: Bob Hunsberger, Hunder Development Ltd.
Malcolm Smith, SENES