



May 15, 2011

Mrs. Keri Martin Vrbanac
c/o Conestogo-Winterbourne
Residents Association (CWRA)
174 Golf Course Road
Conestogo, ON, N0B 1N0

**Re: Peer Review, Hunder Development Ltd. – Dust Assessment of the
Hunsberger Pit
Novus Project No. 11-0006**

Novus Environmental was retained by the Conestogo-Winterbourne Residents Association (CWRA) to conduct a review of the use of the Point Petre station for representing background suspended particulate at the proposed pit in the report prepared by Senes Consultants Limited, dated January 2009 (Dust Assessment of the Hunsberger Pit).

Based on our brief review of the report, we have the following comments.

1. There are two Point Petre locations in Ontario, one located near Point Pelee Island and a second on the South side of Prince Edward County. We have assumed the data is from the station located on Point Petre Road on the south side of Prince Edward County. Regardless, the ambient conditions in these areas with respect to particulate matter have historically been different than the conditions in locations more proximate to Conestogo, Ontario.

The Point Petre locations are in different airsheds or air quality regimes in comparison to Conestogo. It is likely that the representative background particulate concentrations are higher in Conestogo due to closer proximity to

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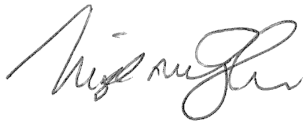
industrial activities and other populated features. This is with the understanding that a significant portion of Southern Ontario's background concentrations for particulate are due to trans-boundary effects. The question should be posed to the proponent as to the justification for using Point Petre as opposed to a closer monitoring station which may have been more appropriate as a representative site.

2. A 90th percentile threshold for particulate matter was used as the threshold for particulate concentrations. For PM_{2.5} the approach used in Canada-Wide Standards is to look at the 98th percentile concentrations over a course of 3 years [*Canada-Wide Standards for Particulate (PM) and Ozone, Canadian Council of Ministers of the Environment, June 2000*]. This would likely increase the background values that have been reported. The question should be posed to the proponent as to the justification for using a 90th percentile.
3. Background TSP concentrations were estimated by doubling PM₁₀ levels due to a lack of TSP monitoring data available at Point Petre Station. There is not sufficient technical information provided in the report to support this assumption for the Conestogo area. Depending on regional ambient conditions around the study area, the TSP/PM₁₀ ratio could be higher than 2, possibly increasing the background values that have been reported. A justification for using this estimate should be provided by the proponent.

A more detailed study of the air quality report can be completed upon your request.

Sincerely,

Novus Environmental Inc.



Nigel M. Taylor, M.Sc., EP
Principal