



June 1, 2020

Region of Waterloo
150 Frederick Street
Kitchener, Ontario
N2G 4J3

Attention: David Welwood, Principal Planner

Shantz Station Pit Air Quality Assessment, Response to Air Quality Peer Review –
Technical Response

Dear Mr. Welwood:

Dillon Consulting Limited (Dillon) had been retained by the Region of Waterloo (the Region) to provide a peer review of an air quality assessment performed for the proposed Capital Paving Inc. Shantz Station Pit, in the Township of Woolwich, Ontario (the Site). The assessment was performed by RWDI AIR Inc. (RWDI) and is summarized in the report "Capital Paving Inc. – Shantz Station Pit, Air Quality Assessment", dated May 14th, 2019 (the Report). Dillon provided a peer review of the report to the Region on December 8th, 2019, (the Review) and RWDI subsequently provided a response on February 4th, 2020 (the Response). Further responses were provided by Dillon on April 15th, 2020, and subsequently by RWDI on May 4th, 2020. This letter provides a response to RWDI's latest response from May 4th, 2020.

This letter summarizes the findings of our peer review. For simplicity, Dillon is providing responses only for those items requiring a response.

1. In response item #2, RWDI has proposed the addition of wording to the Best Management Practices Plan (BMPP) with respect to conifer planting for the screening of R3. The proposed wording is reasonable.
2. In response item #7, RWDI has proposed the following wording for residential receptors: "A residence or outdoor amenity space". Dillon agrees with this wording. Furthermore, Dillon agrees that the same protections provided in the BMPP for residential and outdoor amenity uses are not required for lands used solely for agricultural purposes.
3. In response item #8, RWDI states that an application for a pit does not require an Environmental Assessment and should not be held to the same requirements. Further, RWDI states that the inclusion of fugitive dust in a technical study is not required for this type of undertaking, and is best managed through the implementation of a BMPP.

111 Farquhar Street
Suite 301
Guelph, Ontario
Canada
N1H 3N4
Telephone
519.571.9833
Fax
519.571.7424



Dillon agrees that the Environmental Assessment Act does not apply to the proposed undertaking. However, it is Dillon's opinion that best practices in the assessment of a proposed greenfield development is that which is most protective of the public interest. It is for this reason that Dillon recommended assessment methodologies which are in line with an impact assessment (versus a compliance assessment) and consider the cumulative impact of all sources related to a proposed activity, including fugitive dust.

Dillon agrees that the implementation of a robust BMPP which includes ongoing monitoring for impacts (such as fugitive dust) can provide effective mitigation. Dillon's rationale for recommending a more robust modelling study, inclusive of fugitive dust, is that such a study will better inform the development of a BMPP and operational setback distances.

In consideration of the above, Dillon recognizes that the BMPP and ongoing monitoring may be sufficient to minimize the impacts of fugitive dust. Dillon cautions that the BMPP may require updating based on the actual impacts which may arise from site operations. The BMPP states that the "controls described in the BMPP are reviewed annually to maintain the levels of controls outlined in the Air Quality Assessment". Dillon recommends that the BMPP be updated as required, and annually, at a minimum.

Should you have any questions about our review, please don't hesitate to contact me.

Sincerely,

DILLON CONSULTING LIMITED



Hamish Corbett-Hains, M.A.Sc., P.Eng.
Associate

HCH:mjm

Our file: 19-1803