

April 19, 2021

Proposed Elliot Gravel Pit, Thorndale Information Session Follow Up

On April 7th a virtual community information session was held on zoom to answer questions about the proposed Elliot sand and gravel pit on Thorndale Road. This memo provides additional information in response to some of the questions that were raised at this meeting.

Air Quality

Many concerns were raised at the meeting about air quality and the impacts of dust from the gravel pit.

The Ontario Ministry of Environment (MOE) has a regulation (O. Reg. 419/05) that sets out air quality standards to protect against adverse effect. The Provincial air quality standards apply to all lands use types, including homes and schools.

The MNR's Aggregate Resources Act states that one of the purposes of the act is to minimize adverse impact on the environment in respect of aggregate operations. The MNR addresses adverse impact through Provincial Standards that were developed to support the ARA. The Standards include irrevocable prescribed conditions requiring dust to be mitigated on site and use of water or other approved dust suppressants on internal haul roads and processing equipment. The report standards do not require preparation of an air quality technical report.

Dust management practices are required by the Provincial Standards under the Aggregate Resources Act.

The proposed dust control provisions for the site, including those already required by prescribed conditions within the MNR's Provincial Standards, are as follows:

- Dust will be mitigated on site;
- Water or another provincially approved dust suppressant will be applied to internal haul roads and processing areas as often as required to mitigate dust;
- Processing equipment will be equipped with dust suppressing or collection devices;
- Site entrance will be cleaned as often as necessary to control track-out onto the public road;
- These measures will be incorporated into a Best Management Practices plan for the site, which would also set out staff training plans, equipment maintenance plans (water sprays, water truck, etc.), and record keeping and monitoring/inspection to verify compliance with the plan.

Will there be Ongoing Air Quality Monitoring?

The mitigation measures for the proposed pit are in place to ensure that the site can operate within the provincial limits for air quality. Air quality monitoring is not proposed. We are not aware of any gravel pits or quarries in Ontario where ongoing air quality monitoring is required as an operating condition.

Air Quality Standards in Ontario

A question was raised about whether any changes to the Ontario air quality standards have been considered in light of the coronavirus pandemic. We are not aware of any proposed changes to these regulations. The Ministry of Environment, Conservation and Parks, Environmental Sciences and Standards Division may be able to answer specific questions about how the air quality standards are established and what measures are in place to address health impacts. The contact phone number for this branch at MECP is 416-327-5519.

Well Water Impacts

As indicated at the meeting, the application is for an above water gravel pit. There will be no extraction within 1.5 metres of the high-water table. There are 4 monitoring wells located on the site, in the corners of the area to be licensed. Water levels are monitored, and the operating conditions show that the pit floor elevation must stay above the water table. MNR conducts site audits to ensure that the operation is in compliance, including confirmation that the pit floor is 1.5 metres above the high-water table.

Trucking

It is anticipated that a large percentage of the sand and gravel will be used for construction projects in the Thorndale area, including future development of the 9 acres that the Elliot's own immediately east of the proposed pit boundary. Trucks would be travelling a short distance to deliver sand and gravel to these local projects. The remaining sand and gravel would be shipped either west on Thorndale Road or east on Thorndale, then south on Nissouri Road.

As indicated at the meeting, Thorndale Road and Nissouri Road are County Arterial Roads designed to carry truck traffic. We expect to receive comments from the County of Middlesex and the Township of Thames Centre

Responding to Objections

The Aggregate Resources Act notification and objection period ends on April 26th, 2021. The project consultants will be reviewing letters from agencies who have been asked to review the proposal (MNR, MECP, UTRCA, OMAFRA) together with letters from the municipalities (County and Township) and the public.

In order to provide a co-ordinated, consistent response to everyone, a written response will be sent to objectors in May. We appreciate everyone's interest in having their questions and concerns answered in a timely manner.