



885 Don Mills Road | Suite 106 | Toronto, ON M3C 1V9 | P (416) 391-2527 | F (416) 391-1931

trinityconsultants.com

Trinity
Consultants

VIA E-MAIL: sam@greenwoodconst.ca

July 11, 2018

Mr. Sam Greenwood
Greenwood Construction Company Limited
205467 County Rd. 109
Amaranth, ON
L9W 0V1

*RE: Greenwood Construction Company Limited -Peer Review of Air Quality Assessment - Violet Hill Pit, Part Lots 30, 31, and 32, Concession 4 in the Town of Mono, County of Dufferin, Ontario, OPA and Zoning By-Law Amendment Application, Town of Mono, Ontario
Trinity Project #187201.0166*

Dear Mr. Greenwood:

Trinity Consultants Ontario Inc. (Trinity) is pleased to provide Greenwood Construction Company Limited (Greenwood) the following information in response to the environmental peer review comments provided by Novus Environmental Inc. (Novus) for the above-referenced site, dated February 9, 2018. The comments were provided to Greenwood by the Town of Mono in response to submission of the following Trinity letter.

January 16, 2018, letter addressed to Mr. Sam Greenwood, Greenwood Construction Company Limited, Re: Greenwood Construction Company Limited, Peer Review of Air Quality Assessment – Violet Hill Pit, Part Lots 30, 31, and 32, Concession 4 in the Town of Mono, County of Dufferin, Ontario - OPA and Zoning By-Law Amendment Application, Town of Mono, Ontario prepared by Trinity

The letter was completed in support of applications to amend the Official Plan and Zoning By-law to obtain a licence under the Aggregate Resources Act (ARA) for proposed gravel pit operations on lands owned in the Town of Mono. The application will be for a Class 'A' Licence to Operate a Pit above the known water table.

Response to the follow-up letter is provided below as a copy of the peer review comments followed by Trinity's italicized response.

NOVUS AIR QUALITY PEER REVIEW

1. In Item 1 of this letter, Trinity discusses the recommendation for completing a combined effects analysis and considering background concentrations of selected contaminants.

The Novus recommendation for Greenwood's air quality consultant to prepare a combined effects analysis is not a new precedent in air quality assessment in Ontario for aggregate facilities. It is my opinion, combined effects analysis has become standard practice in these cases, especially for fine particulate matter which has been raised as a health concern due to high background concentrations in particular areas within Southern Ontario.

The purpose of completing the analysis is to provide confirming evidence to the public that the incremental increase in the contaminant studied does not add to an existing issue. There are government sites which

July 11, 2018

record particulate matter data throughout the Province of Ontario. This data is easily accessible and can be utilized in an appropriate analysis.

An example of such analysis can be found in the work completed for the Limebeer Pit, Caledon, Ontario, work that Novus had previously peer reviewed. As was mentioned, incorporating the background or ambient concentration of the compounds studied with the dispersion modelling results will provide interested parties with a better understanding of the levels of the selected contaminants that are expected with the introduction of a new, long-term emission source. It is up to the proponent to decide if there are any other contaminants that should be reviewed in the combined effects analysis.

Trinity mentions in Items 2, 3, 4, 5, the Air Quality Assessment will be updated to address the identified issues. The Town of Mono should be provided an opportunity to review the updated document once completed.

As previously stated, Trinity did not include background concentrations in the Air Quality Assessment report, as this is not a requirement under Ontario Regulation 419/05 Air Pollution - Local Air Quality and the inclusion of background concentrations would not be representative of the site's air impacts at a community-based level. Trinity reviewed available ambient air quality data in Ontario and contacted the Ontario Ministry's Air Monitoring and Trans Boundary Air Sciences Section for confirmation of any data near the Orangeville area or Town of Mono for use in a cumulative effects analysis. The Ministry confirmed that the only available data from Ontario's ambient air quality locations near the proposed site is from larger city centres in Newmarket, Barrie and Brampton, which are more than 25 kilometers from the Town of Mono representing data for the regional area and would not be appropriate for community-based effects.

As previously stated, Ontario's air standards are derived from limiting effects data and apply to all of Ontario. They are not adjusted for background levels, which may vary depending on the microclimate or site-specific activity.

Trinity's original assessment remains as concluded. The site is compliant with Ministry's standards, guidelines and limits and there is no reasonable offsite adverse effects predicted from the proposed site's operations.

We trust this supplemental information meets the requirements of the Town of Mono and addresses the peer reviewer's comments. If you have any questions or comments about the information presented in this letter, please do not hesitate to call me at (416) 391-2527 ext 57.

Sincerely,
Trinity Consultants



Karina E Kenigsberg, M.Sc., P. Eng.
Senior Consultant

cc: Mr. Craig Lang, C.D. Laing Aggregate Management Services Ltd.
Chris Scullion, Trinity