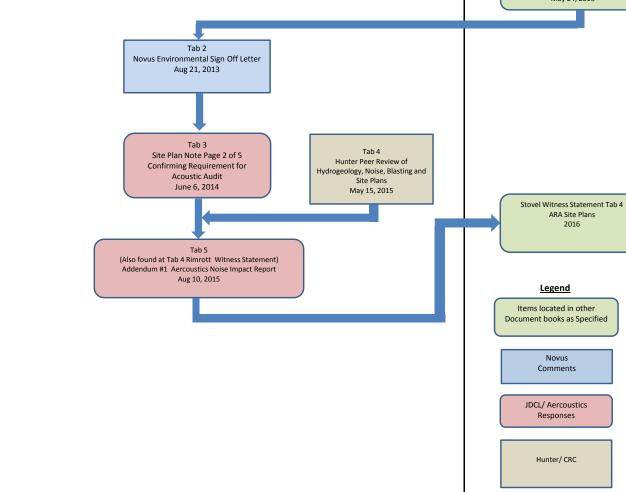
Evidence Book 13 29-Apr-16 **Township of Guelph/Eramosa Noise Impact Review Document Book** Tab 1 Rimrott Witness Statement Tab 1 Novus Environmental Comments Aercoustics Noise Impact Repot Apr 8, 2013 Nov 19, 2012 Rimrott Witness Statement Tab 2 Response to Peer Review May 24, 2013 Rimrott Witness Statement Tab 3 Updated Aercoustics Noise Impact Report May 24, 2013



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April 8, 2013

Cuesta Planning Consultants Inc. 978 First Avenue West Owen Sound, ON N4K 4K5

Attn: Mr. Michael Davis

Re: Peer Review, Acoustical Study Hidden Quarry Novus Project No. 12-0258

Novus Environmental was retained by Cuesta Planning Consultants Inc. on behalf of the Township of Guelph/Eramosa to conduct a peer review of the noise and vibration assessment work conducted for the proposed James Dick Construction Ltd. "Hidden Quarry", to be located in Rockwood, Ontario. This letter presents the results of our findings.

In conducting our assessment the following information have been reviewed:

- "Noise Impact Study, Project 11007, Hidden Quarry, Rockwood Ontario" prepared by Aercoustics Engineering Ltd. (AEL), dated November 19, 2012;
- "Blast Impact Analysis, James Dick Hidden Quarry", prepared by Explotech Engineering Ltd. (Explotech), dated November 19, 2012;
- Ministry of the Environment (MOE) Publication NPC-205 noise guidelines for semi-rural areas;
- MOE Publication NPC-232 noise guidelines for rural areas;
- Township of Guelph/Eramosa Noise Bylaw 5001-05;
- County of Wellington Official Plan, 1999 (Last Revision February 24, 2011);
- Correspondence with Mr. David Grant, Aercoustics Engineering Ltd.; and
- A site visit to the area of the proposed quarry.

novusenv.com

Atmospheric Sciences | Acoustics | Human Health

Novus Environmental Inc. | Research Park Centre, 150 Research Lane, Suite 105, Guelph, Ontario, Canada N1G 4T2 e-mail info@novusenv.com | tel 226.706.8080 | fax 226.706.8081



1.0 Aercoustics Noise Impact Assessment

We have reviewed the noise impact assessment prepared by AEL, and in general, are satisfied with the approaches taken. However, we do have some comments and concerns with the analysis and conclusions.

1.1 Criteria

Novus is in agreement with the criteria selected. MOE Publication NPC-205 "Class 2" and NPC-232 "Class 3" limits apply to the residences in the area, as outlined in **Table 1** of the AEL report.

Receptor-specific limits for residences along Highway 7 were developed, based on road traffic noise modelling, for receptors R2, R10, R14, and R16. While the report states on Page 4 that sample calculations are provided in Appendix C, the copy of the report provided does not include this information. AEL provided this information via email, and Novus is in agreement with the guideline limits proposed.

1.2 Receptor Height

Page 6 of the AEL report notes that a receptor height of 1.5 m was used in the assessment. This is inconsistent with both MOE NPC-205 and NPC2-232 noise guidelines.

NPC-205 defines the point of reception as "any point on the premises of a person where sound or vibration originating from other than those premises is received." NPC-232 defines it as any "point on the premises of a person within 30 m of a dwelling or a camping area, where sound or vibration originating from other than those premises is received."

The guidelines do not distinguish between "daytime" receptors and "night-time" receptors". Under the definitions, points of reception include first storey windows, upper-storey bedroom windows, and ground level outdoor amenity areas within 30 m of the residence. It is important that upper storey bedroom windows be included in the analysis, as these locations receive less acoustical screening (mitigation) from berms and noise barriers, and thus can experience higher sound levels. These receptor locations are typically modelled at a 4.5 m receptor height for second-storey windows.

MOE Publication LU-131 – *Noise Criteria for Land Use Planning* is often used as a justification for using lower receptor heights. While LU-131 does identify daytime and night-time points of reception separately, it does not apply to the on-going permitting of operations at the proposed quarry, which must meet NPC-205 and NPC-232 requirements. The Ministry of the Environment has been consistently clear that "night-time" points of reception such as bedroom windows should also be investigated during daytime hours from a permitting perspective under NPC-205 and NPC-232. This was made explicit in the draft replacement NPC-300, which, while not in force, serves to illustrate the MOE's position. In the draft guideline, which is a replacement for both LU-131 and NPC-205, no differentiation is made between daytime and night-time receptors.



This is a major issue with the AEL analysis, as receptor height plays a crucial role in the effectiveness of noise berms and barriers. However, many of the residences in the area are one storey, and therefore the conclusions of AEL analysis (that the facility will be in compliance) may be correct. This needs to be confirmed to ensure compliance with the guidelines. Based on a drive-by survey, the following receptor heights and locations should be used in the analysis:

Receptor	Location	NPC Area	No. Of	Receptor Height and Location
No.		Classification	Storeys	Per NPC-205 / NPC-232
R1	Highway 7	Class 2	2	4.5 m at house; 1.5 m on property
R2	Highway 7	Class 2	1	1.5 m at house; 1.5 m on property
R3	6 th Line	Class 3	1	1.5 m at house; 1.5 m on property within 30 m of house
R4	6 th Line	Class 3	2	4.5 m at house; 1.5 m on property within 30 m of house
R5	6 th Line	Class 3	2	4.5 m at house; 1.5 m on property within 30 m of house
R6	7 th Line	Class 3	1	1.5 m at house; 1.5 m on property within 30 m of house
R7	7 th Line	Class 3	2	4.5 m at house; 1.5 m on property within 30 m of house
R8	7 th Line	Class 3	2	4.5 m at house; 1.5 m on property within 30 m of house
R9	7 th Line	Class 3	1	1.5 m at house; 1.5 m on property within 30 m of house
R10	Highway 7	Class 2	2	4.5 m at house; 1.5 m on property
R11	6 th Line	Class 3	1	1.5 m at house; 1.5 m on property within 30 m of house
R12	Highway 7	Class 2	1	1.5 m at house; 1.5 m on property
R13	Highway 7	Class 2	1	1.5 m at house; 1.5 m on property
R14	Highway 7	Class 2	1	1.5 m at house; 1.5 m on property
R15	5 th Line	Class 2	1	1.5 m at house; 1.5 m on property
R16	Highway 7	Class 2	1	1.5 m at house; 1.5 m on property
R17	5 th Line	Class 3	2	4.5 m at house; 1.5 m on property within 30 m of house
R18	5 th Line	Class 3	2	4.5 m at house; 1.5 m on property within 30 m of house
R19	6 th Line	Class 3	2	4.5 m at house; 1.5 m on property within 30 m of house

Receptor Heights and Locations for Noise Impact Assessment

Recommendation – the AEL analysis needs to be updated to reflect the appropriate receptor heights, to ensure that the applicable Ministry of the Environment noise guideline limits are met.



1.3 Construction Activity

Novus is in agreement that noise from the "construction" aspects of the quarry operation, including striping of overburden and rehabilitation, are exempt from NPC-205 and NPC-232 noise guideline limits.

Novus also agrees that the noise emissions from quarry equipment be restricted to meeting NPC-115 limits, as applicable. These restrictions should be listed in as part of the quarry's operating plan.

The prohibitions of the Township of Guelph/Eramosa Noise Bylaw 5001/05 would also apply to noise emissions, and is not addressed in the AEL report. The bylaw requires that equipment be fitting with effective exhaust and/or intake muffling and be maintained in good working order.

Recommendation – an Acoustic Audit by an independent third-party contractor be conducted during the first year of operation of the quarry, to ensure that the noise emissions from facility equipment meet NPC-115 limits.

1.4 Noise Source Emission Rates

Novus has reviewed the source emission rates used in the noise modelling. The values are consistent with those typically used in these studies. It is uncertain if a tonal penalty has been applied to rock drilling noise. Noise emissions from this equipment is typically tonal in nature, and under MOE Publication NPC-104, a +5 dB tonal penalty would be applied to the assessment of impacts.

Recommendation

- AEL to confirm if tonal penalties should apply to rock drilling, or if a specific non-tonal drill type will be used.
- Tonality should be confirmed through an Acoustic Audit

1.5 Modelling Results

The modelling result provided in **Table 6** of the AEL report show the proposed quarry to be in compliance with the applicable guideline limits. However, these results are subject to the issues identified above (receptor height, guideline limits, tonality) and need to be updated.

The quarry will be excavated in several phases. The report does not indicate which phase was being assessed (or if the results are worst-case for all phases). The report does not indicate where source equipment is being located within the quarry for noise modelling purposes. Without this data, the accuracy of the noise modelling cannot be confirmed.

In addition, the tabular format of the data does not allow for compliance with NPC-232 to be confirmed for receptors removed from Highway 7. For these locations, the applicable limit needs to be met both at all points on the house, but also at all points at ground level within 30 m of the dwelling. This can be addressed through providing noise contours (isopleths of equal noise levels) of the noise modelling results. This can be easily accommodated using the Cadna/A noise model.



Recommendations

- Update the results to address receptor height, guideline limits, etc., as discussed previously.
- Update the analysis to show impacts for various phases of the excavation. Ideally, provide the electronic Cadna/A noise model for peer review. Alternatively, provide drawings showing the location of modelled noise sources for each phase of excavation.
- Provide noise contours at a high of 1.5 m above grade to allow for confirmation of compliance with NPC-232.
- An Acoustic Audit by an independent third-party contractor be conducted during the first year of operation of the quarry, to ensure that the noise emissions from facility operations meet NPC-205 and NPC-232 limits.

2.0 Explotech Vibration Report

Novus has reviewed the blasting vibration report produced by Explotech. We are in agreement with the guidelines used; the assessment techniques used; and with the general conclusions of the study.

We agree with the recommendations on Page 9 and Page 19 of the report, that blast monitoring should be used and that all blasts at the quarry be monitored at two locations. Novus further recommends that the blast record information be made available to the Township for its review in the presence of vibration complaints.

3.0 Conclusions

From our review, we conclude that:

- The Vibration Impact Assessment conducted by Explotech is adequate, and Novus agrees with the recommendations and conclusions. Novus further recommends that the blast record information be made available to the Township for its review in the presence of vibration complaints.
- The Noise Impact Assessment conducted by AEL has been reviewed. Novus is generally in agreement with the approach taken; however, several issues have been identified which will need to be addressed to ensure that the facility is in compliance with the applicable noise guideline limits.
- Novus recommended the following additional analysis be undertaken / additional information be provided by AEL:
 - Update the modelling to use 4.5 m receptor heights for daytime and night-time, in accordance with NPC-205 and NPC-232 requirements
 - Provide source locations used in the modelling for the extraction phases considered

Harmonizing the Built and Natural Environments



- Provide noise contours at a 1.5 m and 4.5 m height for the various phases of extraction considered in the analysis, to allow for compliance with nPC-205 and NPC-232 to be confirmed.
- o Confirm if NPC-104 tonal penalties apply to the assessment of the rock drill
- o Ideally, provide the Cadna/A electronic noise modelling files for review
- Novus also recommends that a third party acoustical audit be conducted during the first year of operation. The audit would ensure that:
 - Noise emissions from the actual facility equipment meets NPC-115 requirements and are equal to or less than that used in the noise impact assessment;
 - The equipment is in good operating order, meeting the Township Noise Bylaw requirements;
 - The mitigation measures, including berms and barriers, outlined in the noise report are installed and in operation; and
 - The resulting noise impacts from facility operations are in compliance with NPC-205 and NPC-232 requirements.

Such acoustic audits are often agreed to as part of conditions of approval.

Should you have any questions or concerns, please feel free to contact us.

Sincerely, Novus Environmental Inc.

R. L. Scott Penton, P.Eng Principal





August 21, 2013

Cuesta Planning Consultants Inc. 978 First Avenue West Owen Sound, ON N4K 4K5

Attn: Mr. Michael Davis

Re: Peer Review, Acoustical Study - Hidden Quarry Review of Revised Aercoustics Noise Report and Response to Comments Novus Project No. 12-0258

Novus Environmental was retained by Cuesta Planning Consultants Inc. on behalf of the Township of Guelph/Eramosa to conduct a peer review of the noise and vibration assessment work conducted for the proposed James Dick Construction Ltd. "Hidden Quarry", to be located in Rockwood, Ontario.

Our peer review results were previously documented in letter entitled "Peer Review, Acoustical Study, Hidden Quarry", and dated April 8, 2013. That letter outlined a number of recommendations for updates t the noise modelling and reporting for the quarry application.

Subsequently, Aercoustics Engineering Ltd. (AEL) has conducted a re-assessment of impacts and provided a response to comments. This work is documented in:

- "Noise Impact Study, Project 11007, Hidden Quarry, Rockwood Ontario" prepared by Aercoustics Engineering Ltd. (AEL), dated May 24, 2013; and
- AEL letter to James Dick Construction entitled "Response to Peer Review from Novus Environmental Inc. for Proposed Hidden Quarry in Rockwood, Ontario, dated April 8, 2013", and dated May 24, 2013.

1.0 Overall Review

We have reviewed the updated noise impact assessment prepared by AEL, and their responses to our comments, and in general we are satisfied. Based on the revised information, noise levels from the proposed quarry operations will meet the applicable guideline limits at all noise-sensitive points of reception.

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2.0 Additional Recommendations Not Addressed in Revised Aercoustics Work

Regardless of the above, based on the AEL report, compliance with the guideline limits is dependent on the use of noise mitigation, placement of equipment, and the use of "quiet" rock drills.

In our original peer review, Novus recommended that a third party acoustical audit be conducted during the first year of operation. The audit would ensure that:

- Noise emissions from the actual facility equipment meets NPC-115 requirements and are equal to or less than that used in the noise impact assessment;
- Noise emissions from the rock drill meet the maximum power level specification contained in Section 4 of the AEL report;
- The equipment is in good operating order, meeting the Township Noise Bylaw requirements;
- The mitigation measures, including berms and barriers, outlined in the noise report are installed and in operation; and
- The resulting noise impacts from facility operations are in compliance with NPC-205 and NPC-232 requirements.

Such acoustic audits are often agreed to as part of conditions of approval.

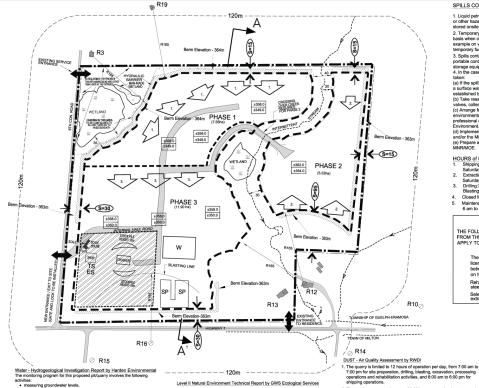
An acoustic audit was not discussed in any of the AEL documentation provided, and we would still recommend that such an audit be agreed to.

Should you have any questions or concerns, please feel free to contact us.

Sincerely, Novus Environmental Inc.

R. L. Scott Penton, P.Eng Principal





Water - Hydrogeological Investigation Report by Harden Environmental The mo oring program for this proposed pit/quarry involves the follo

ues: measuring groundwater levels, obtain water quality samples, monitoring water levels in the on-site wetland and stream, and

TECHNICAL RECOMMENDATIONS

A hydraulic barrier shall be installed along the southern and eastern portions of th wetland. The barrier will limit the outflow of groundwater downgradient of the wetland. The schematic of the hydraulic barrier is set out on the Site Plans. A water well complaint protocol will be implemented. Details and the table below are

	contained in the Harden Report "Hidden Quarry Monitoring Program and Contingency Measures" dated November 11, 2015.					
Parameter	Monitoring Locations	Frequency				
Groundwater Levels	M1S/D, M2, M3, M4, M6,	Manually Monthly				

	M1580, M1430, M15, M16, M17, M18, M19, MPN1, MPN2, MPS1, MPS2, MPE1, MPE2, MPV1, MPW2, TP1, TP8 TP9, MP1, MP2, MP3, MP4	Automatic Daily Measurement in M1D, M2 M3, M4, M13D, M15, M16 for year prior to and year following bedrock extraction with re-evaluation of monitor frequency after 1 st year of bedrock extraction.
Groundwater Levels	M2, M3, TP1, M13S/D M114S/D, M15, M16, M17	5 minute interval during first 3 months of extraction
Surface Water Level	Sinking Cut	Automatic Daily after safe quarry face is established
Surface Water Level	SW14, SW5, SW7	Manually Monthly Coincident with groundwater monitoring
Surface Water Levels	SW6, SW4, SW8	Automated Water Level Readings (4 hour interval)
Surface Water Flow	SW4, SW8, SW3	Manually Monthly *coincident with groundwater monitoring
Surface Water Flow	Brydson Spring	Monthly
Groundwater Quality	W1, M2, M3, M4, M15, M16, M17, M18, M19	Semi-Annually
Surface Water Quality	West Pond, East Pond, Northwest Wetland Tributary B (SW4, SW3)	Semi-Annually (Spring and Fall)
Climate	On-Site Weather Station at Scale House to include precipitation and temperature	Daily
Domestic Wells Water Level	W3, W4, W5, W8, W9 (W7 removed at request of landowner) (see also Section 4.0)	Data Loggers
Domestic Well Water Quality	W10, W11, W16, W17, W18 W19, W20, W21, W22, W23, W24	Quarterly bacteria and annual nitrate.

equency of offste monitoring may be revisited in the future based on a review of the d Hydraulic Barrier Cross Section, Trigger Levels and Contingency Measures are located on Page 4

____ 120m _____

Level II Natural Environment Technical Report by GWS Ecological Services

A 30m buffer will be established from the limit of the PSV provided the dentified Archaeological Fature is cleaned. If this is not the case the hydraulic starris will be installed approximately 2km from the PSV in this approximation of the PSV in this approximately 2km from the PSV in this approximation of the PSV in this approximation program to that the provided the provided the provided the provided the hydrogenerative provided the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the buffer approximation of the provided the provided the provided the provided the buffer approximation of the provided the provided the provided the provided the buffer approximation of the provided the provided the provided the provided the provided the buffer approximation of the provided the provided the provided the p

 In the southeastern portion of the site qualified staff will flag and/or stake the dripline of trees which mark the boundary of FOM2-2 and will also assist the survayor in staking the setaback required from the osciting off-site residence (*u.e.* minimum of 168 m) which traveness portions of woodland units CUP3-128, FCC2-2, FOD5-1 and CUP3-128. Elsewhere on the property the surveyor must stake the required setbacks from property boundaries

 Prior to the initiation of tree clearing operations trees which occur immediately beyond the spacified setbacks will be marked with orange syray paint by qualified staff to uritner ensure three are no intrusions into tree protection areas. Trees to be removed will be marked with an orange dot at chest height and a slash of the but which ocands to the ground. Existing vegetation will be ed until just prior to stripping extract

Tree protection measures will be installed as required around the limit of the extraction area after all tree clearing and grubbing is completed.

 To facilitate access to the eastern extraction area an appropriately sized culvert must be installed in the intermittent stream at the location shown in the Operations Plan. Culvert installation will occur in the summer months when there is no flow in the stream. No in-water work is to occur during the warm water fisheries timing window (April 1 - June 30).

Topsoil and overburden will be stripped and stored separately in bermed stockpiles as illustrated on the Operations Plan. All berms will be graded to stable slopes and seeded to prevent erosion and minimize dust. See note 10.

 Dust control will be implemented in accordance with the procedures described on the Operations Plan

Progressive rehabilitation will be implemented as specified in the Site Plans and replanting will commence as early as possible with an emphasis on the area adjacent to the PSW and northern properly into (i.e., Phase 1 on the Operations Plan). Extracted areas will be promptly restored to an ecological attenues as set out on the Progressiva and Final Retrabilitation Plan.

All tree and shrub planting stock will be obtained from nurseries that utilize seed from the same genetic seed zone wherein the James Dick property is located. Shoreline wetlands will only be planted with native species taken from local

A mix of coniferous / deciduous trees (minimum spacing of 3m) will be planted along the 6th Line to increase forest density in an attempt to provide an effective natural corridor in the north and west side of the property.

SPILLS CONTINGENCY AND RESPONSE PROGRAM Liquid petroleum products (fuels, oil) in quantities greater than 500 litres or other hazardous liquid chemical associated with the operation will not be stored onsite on a permanent basis. 2. Temporary fuel storage facilities will be inspected for leaks on a regular

basis when operations are occurring. If operations are not occurring (for example on weekends or during an extended shuldown period), inspection of temporary fuel storage facilities remaining onsite will occur weekly. 3. Spills containment materials (for example, absorbency materials and portable containers) are to be available on-site as part of the temporary fuel

storage equipment. 4. In the case of an accidental spill of fuel or oil, the following action is to be

taker: (a) If the split volume is approximately 5 L or more, or the split occurs directly to a surface water feature, contact the Township and the Splits Action Centre established by McDEC (1:480-286 e6001) (b) Taker reasonable measures to stop or control the split (such as closing valves, collecting leakage in a container, applying the absorbency materials) (c) Arrange for an inspection of the split site and a general assessment of the environmental impact by a Qualified Poten (Qualified Person Resense a y of the ofessional engineer or professional geoscientist) and/or the Min

Implement remedial measures as recommended by the Qualified Person Jor the Ministry of the Environment. Prepare a written report on the incident for review by the Township,

MNR/MOE

- HOURS of OPERATION
- Shipping and Loading: 6 am to 6 pm Weekdays and 6 am to 1 pm -Saturdays. Extraction and Processing: 7 am to 7 pm Weekdays and 7 am to 1 pm -2
- 3. Drilling:7 am to 7 pm - Weekdays, 7 am to 1pm - Saturdays Blasting: 8 am to 5 pm - Weekdays.
- Closed for Operations on Sundays and Public Holidays. Maintenance and Rehabilitation may occur during normal weekday hours, 6 am to 7 pm, and on Saturdays from 7 am to 5 pm.

SITE PLAN OVERRIDE TABLE

THE FOLLOWING CONDITIONS ILLUSTRATED ON THIS PLAN VARY FROM THE REQUIREMENTS OF THE PROVINCIAL STANDARDS THAT APPLY TO LICENSED PITS AND QUARRIES IN ONTARIO. STANDAR OVERRIDE

The fence in the NW corner will not follow the licenced boundary but will follow inside the berm between the existing wetland and the berm as shown on the plan 5.1

Rehabilitation of side slopes may occur at a slope steeper than 2:1 to promote ecological diversity 5 19 2 Selected trees will not be removed within 5m of the 5.5

Blasting - Blasting Impact Assessment by EXPLOTECH It is recommended that the following conditions be applied for all blastin operations at the proposed James Dick Construction Hidden Quarty:

1. An attenuation study shall be undertaken by an independent blasting An attenuation study shall be universitation by an independent basising consultant during the first 12 months of operation in order to obtain sufficient quarry data for the development of sile specific attenuation relations. This study will be used to confirm the applicability of the initial guideline parameters and assist in developing future blast designs.

2. All blasts shall be monitored for both ground vibration and o All basis shall be monitored for both ground vibration and overp at the closest privately owned sensitive receptors adjacent the si closer, with a minimum of two (2) digital seismographs - one inst front of the blast and one installed behind the blast. Monitoring si

ing shall be performed by an independent party engineering firm with specia blasting and monitoring.

Orientation of the aggregate extraction operation will be designed and maintained so that the direction of the overpressure propagation and flyrock from the face will be away from structures as much as possible.

4. Blast designs shall be continually reviewed with respect to fragmentation, ground vibration and overpressure. Blast designs shall be modified as required to ensure compliance with applicable guidelines and regulations. Decking, reduced hole diameters and sequential blasting techniques will be used to ensure minimal actiosives per delay Stripping of overburden will be limited to times when extraction, production and shipping activities are well below the estimated peak rate of 6,000 tonnes per day. period ini

5. Clear crushed stone will be used for stemming.

Primary and secondary dust collectors will be employed on the rock drills to keep the level of rock dust to a minimum.

 Blasting procedures such as drilling and loading shall be reviewed on a yearly basis and modified as required to ensure compliance with indust yearly basis standards.

Detailed blast records shall be maintained. The MOECC (1985) recommends that the body of blast reports should include the following

Intermediant - Localion, date and time of the blast. - Dimensional sketch including photographs, if necessary, of the location of the blasting operation, and the nearest point of reception. - Physical and topographical description of the ground between the source and the receptor location.

source and the receptor location. • Type of material being blastict. • Sub-soil conditions, if known. • Prevailing meteorological conditions including wind speed in m/s, wind direction, air temperature in °C, relative humidity, degree of cloud cover and cmund metistere content.

Size of holes. Depth of chilling. Depth of colum (or demming). Depth of charge per delay. Weight of charge per delay. The result and calculated value of Peak Pressure Level in dB and Peak Particle Velocity in mms. Audicable imits.

The excess, if any, over the prescribed limit.

· Earth berms shall be constructed to the elevations shown and located as And ground moisture content.
 Number of drill holes.
 Pattern and pitch of drill holes.

Size of holes

The processing plant area shall be established at a maximum elevation o 351m, and a haul route trench connecting the processing plant area to the Stage 1 Phase 1 extraction area should be excavated to the same 351m

10

A quiet drill with a maximum sound power rating of 112dBA should be used This corresponds to a maximum sound pressure level rating of 75dBA at 30

All construction equipment used in site preparation/construction must meet the sound emission standards defined in MOE publication NPC-115 and Guerb/Enranose Bylewis 2010/85. The travent background information on non-stationary noise sources as well as publication NPC-115 is given in MOE Model Municipal Noise Control Bylaw, 1978 as well as the sound source exclusions defined in MOE publications NPC-

2. The maximum processing rate of 6,000 tonnes per day is not exceeded

Equipment specific controls will be implemented including a 25km/hr speed limit, appropriate tail pipe emission tiers, and dust suppression.

5. A Best Management Practices Plan will be developed and implemented. 6. The processing plant will be located approximately as shown on the

Noise Impact Study and Addendum by Aercoustics

12m and 10m high stockpiles should be maintained in certain locations around the processing plant for each phase and stage. The stockpile peaks should be located in suffret thran 30m from the processing plant, and should be located such that, in plan, they block line-of-sight between processing plant equipment and sensitive recorptors, as described in the

mended Stockpile Height and Positio Stockpiles Positioned To Shield Minimum Stockpile Receptor IDs Height (m)

Recommended Noise Control Measures:

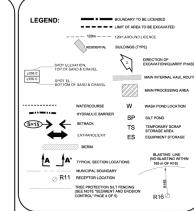
An Environmental Compliance Approval under Section 9 of the Environmental Protection Act (EPA) will be obtained as required.

site plan

R3 to R7, R11 and R19

shown on the site plans.

An Acoustic Audit by an independent third-party contractor shall be conducted during the first year of operation of the quarry, to ensure that the noise emissions from the facility equipment meet NPC-115 limits.



NOTES:

- This plan depicts a schematic operations sequence for this property based upon the best information available at the time of preparation. Phases shown are schematic and may vary with demand and variation in the aggregate deposit. Phases do not represent any specific or equal time period. Phases and fits may be operated concurrently. Excervation with accur above and below the
- 2 The lands are to be rehabilitated to an ecological after-use with the on of a lake (s).
- Incorporation of a lake (a). The talk will be operated in several Phases, consisting of two lifts, as shown on the Sile Plan. The first lift will involve the extraction of the unconsolidated material above the water table. The second lift will involve the extraction of consolidated material. The second lift will involve the extraction of the second second gradientism, and with lift utables. One to the variability in store and set of gradients, and with lift utables of the site of the second aggregate products, extraction may occur simultaneously at different portions of the site, unless otherwise pecified in the technical reports, is, noise and 3
- deal. Extraction operations will use loaders, drag-lines and excernion, which will feed a processing plant(s), i.e. routhing, screening and weaking plants. Other acquirement to be used on the sale includes: trucks, tracters, proclabe drill, acrapers, and dozens. Equipment will be stored in the main processing series, and from a installand will occur along the permitter of the sale in a regularity. Just the installed about 20m in front of the scale house. Fencing will follow bin sides of the marine into the quark to the path.
- both sides of the entrance into the quarry to the gate. On site permanent fuel storage will not occur in quantities greater than 500
- litres. Processing equipment and aggregate stockpiles resulting from this operation shall proceed as close to the excavation face as possible, during the initial phase of operations. A main processing area will be developed in the south western portion of the site once a sufficient area has been cleared. It is anticipated that the only buildings or structures that will be constructed are
- a scale, scalehouse and a maintenance shop/office/ quality lab. The scale and scalehouse will be located close to the main entrance to the site, adjacent to the 6th Concession.
- the 6th Concression. Scrap will not bestrod permanently onsite. Temporary scrap piles will be located in the main processing area as shown on the Site Pian. Onsite overburden quantifies are minimal, therefore onverburden and topsoil may be stored together in the stockpile locations or perimeter barms. Where here is a sufficient dight of suboil and overburden, stripping and storage will strage with the store of the stock of the store of the sto 10
- occur separately. Topoli and overburden stockpiles will be seeded with an appropriate grass legums seed mixture to prevent excision(See typical screening berm detail). All vegetation planted during the operation of the site will be maintained in a healthy growing condition. Should any planted vegetation die, it will be replaced 12
- healthy growing condition. Should any plainted wigetabon de, if will be replaced within one growing season. 3. One (looped) internal haul roads is shown on the plan. Internal haul roads may need to be modified during the occurse of operations to portmit efficient access different product stockples. The internal haul road will be pawed from the entrance to the scale. The internal haul road will be pawed from the entrance to the scale. The internal road and will be pawed from the entrance to the scale. The internal road and be impegate are not tracked only. Or more often as required, to ensure that dust and aggregate are not tracked onto the municipal read system. Dask will be controlled through mechanical sweeping 13

18

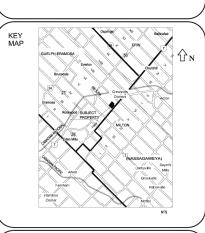
- municipal road system. Dust will be controlled through mechanical sweeping and or treatment with water. Aggregate will be transported from the pit to a year-round access onto 6th Concession. Trucks will use Provincial Highway 7 as the main haul route. The existing ground water table occurs at +/- 348 to 336 mail. There will be no proposed water dreations or points of discharge to surface water from this alts. Surface drainage will be allowed to percolate through the rehabilitiest pit/quary floor and reflect the existing surface drainage as much as possible 17
- Dust control will be maintained through the use of a MOECC approved dust Data control win be inatianted a rough the base of a swetce-capproved data suppressant or water as required as small pond (< 0.4 ha in size) may be temporarily setablished on the pil/quary floor to permit washing operations and to provide water for data suppression. Sitt may be deposited in quary ponds. A permit to take water will be obtained from the MOECC prior to any washing
- operations taking place are required. The location of using upgetationnatural tree screening is shown on Page 1. Any trees or stamps that are needed to be removed from the extraction area half be harvesed, mulched or used for rehabilitation purposes. The area to be extracted is 24.5 ha. 20
- extracted is 24.5 na. 21. The maximum tonnage to be removed from this license in any calendar year shall be 700,000 tonnes. 22. The existing Service Entrance at the north end of the site on the 6th line will
- The existing self-vice transmics as use nontinenco or use site of we wanted with permit access for maintenance and operational vehicles only. Commercial traffic will be restricted to the main commercial scale entrances only. The commercial entrance to the site will be designed in accordance with the Township of Queph/Erransea Design Standards within the right of way. The design of the commercial entrance shall allow at least one full truck to be off the 23 travelled portion of the road with the gate closed. Topsoil that is stripped from operational areas will be placed in screening berms
- 24. around the perimeter of the site as shown on the site plans. As part of fina around use permeter of the size as shown on the size pairs, As part of this rehabilitation the topol in berms will be used to achieve final contours as indicated on the site pans. Truck Entrance varning signs will be placed on the sixth line as required, according to the Ontario Traffic Manual, based on 80km/hr speed (8th line and 10km/hr (Hw) 7 subject bMT recommendations for Hw 7.
- tions will not take place during the breeding bird 26

period (May 15 - July 31).

HIDDEN QUARRY

PART OF LOT 1, CONCESSION 6 TOWNSHIP OF GUELPH-ERAMOSA FORMER TOWNSHIP OF ERAMOSA COUNTY OF WELLINGTON

Page 2 of 5 **OPERATIONS PLAN**



THIS SITE PLAN IS PREPARED UNDER THE AGGREGATE RESOURCES ACT FOR A CLASS A LICENCE, CATEGORY 2 - QUARRY BELOW WATER.

THESE SITE PLANS HAVE BEEN PREPARED UNDER THE DIRECTION OF AND CERTIFIED BY A PERSON APPROVED BY THE MINISTER OF NATURAL RESOURCES (AS PER SECTION 8(4) OF THE AGGREGATE RESOURCES ACT).

SIGNATURE:			DATE:		
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PLOT	OVED: R.P. TED: JANU	S. IARY 11, 2016		G.K.S.	
No.	DATE		DESCRIPTION		APP
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HUNTER AND ASSOCIATES Environmental and Engineering Consultants









Proposed Hidden Quarry Zoning By-law Amendment and Aggregate Resources Application Pt W1/2 Lot 1, Conc 6

MAY 15 2015

(Eramosa), Guelph/Eramosa Township

PEER REVIEW



HUNTER and ASSOCIATES Environmental and Engineering Consultants

May 15, 2015

www.hunter-gis.com gisinfo@hunter-gis.com



Our File No.: 14-401

HAND DELIVER

Ms. Kim Wingrove Chief Administrative Officer Township of Guelph/Eramosa 8348 Wellington Road 124 P.O. Box 700 Rockwood, ON N0B 2K0

Re: Peer Review on behalf of the Concerned Residents Coalition Proposed Hidden Quarry Zoning By-law Amendment and Aggregate Resources Application Pt W¹/₂ Lot 1, Conc 6 (Eramosa), Guelph/Eramosa Township

Dear Ms. Wingrove,

I have now completed my Peer Review of the extensive Hidden Quarry Applicant (James Dick Construction Ltd) document stack as described in my enclosed project bibliography. This Peer Review as you are aware follows my formal requests for clarification issued to the Township May 20 and August 5, 2014.

The Applicant's formal responses to my hydrogeological questions were received through the Township on August 21 and December 1, 2014 respectively. Additional still missing information and clarifications were requested and provided directly by JDCL during the period December 9, 2014 to February 12, 2015 when the response was determined to be reasonably complete. Since that date there have been Site Plan revisions and more correspondence. This review is based on the Applicant's March 19, 2015 Site Plan version.

The reader should understand the following hydrogeological context of the proposed Hidden Quarry Site:

- The Applicant is proposing to extract quarry rock for the most part below the water table in a subaqueous environment. Extraction will take place from above the water table to remove the granular overburden and create a dry work area at the top of the unweathered bedrock to enable drilling, blasting, subaqueous excavation, stockpiling, drainage and loading of shotrock into rock haul trucks for transport to the Site Plan designated processing area.
- The extraction process will 'flatten' the existing water table gradients lowering the water levels on the northern upgradient side and increasing water levels on the south downgradient side of the operating quarry excavation. Lowered water levels on the north side of the quarry will increase the groundwater capture from catchments to the north and increase flow through the quarry. Passive and active (pumping) dewatering will reduce the dry season base flows and alter the seasonal recharge water balance.

Ms. Kim Wingrove Chief Administrative Officer Township of Guelph/Eramosa May 15, 2015 Page 2 of 56

- The surface watershed of Tributary B includes a portion of the south slope of Paris Moraine on and north of the De Grandis farm (Lot 2, Conc 6 Eramosa). However, the bedrock catchment for Tributary B extends further north under the Moraine and under the Tributary A headwater as well. In contrast, Tributary C bedrock catchment is smaller than the Tributary C surface watershed. The Bedrock catchments have not been determined to date.
- Groundwater quarry interference effects with nearby domestic wells (quality and quantity must be minimized).
- Loss of flow (infiltration recharge) in Tributary A, B and C, Conc 6 (Eramosa) is considered a 'good thing' and beneficial to maintenance of dry season groundwater upwelling and base flow in the permanently flowing Brydson Creek.
- A preferential groundwater flow convergence zone occurs through the proposed quarry site in the general vicinity of Tributary B to the Brydson Creek headwater springs.
- Brydson 'spring' is a series of springs and groundwater upwellings beginning west of the barn on the Brydson property. Brydson Creek is excellent cold water Brook Trout habitat (Schieffer, 2015).
- Brydson Creek headwater brook trout habitat is dependent on receiving groundwater upwellings. Groundwater flowing through the proposed quarry and adjacent environments supports these upwellings. It is critical that the groundwater derived baseflows are maintained to sustain the Brook Trout habitat.

My peer review will focus on an in-depth review of the significant hydrogeological deficiencies in the Applicant's Hydrogeology reports as well as comments concerning the site plans, blasting study and the noise study. I have provided a brief summary of my concerns and the rationale for my conclusions in Sections 2.0 through 6.0 of this letter.

My conclusions and recommendations are included in Sec 7.0 and 8.0 of this report. Sample Site Photos, Tables, annotated Figures and a Bibliography are enclosed. The reader may wish to review these documents prior to reading the more technical Sec 1.0 to 6.0 of this letter.

A table of contents for this letter follows.



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Hidden Quarry Peer Review Hunter and Associates

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Illustrative Figures and Photos are enclosed and listed on the final page of this letter.

1.0 SITE PLANS

I will address the Site Plan deficiencies initially as the Site Plans are the enforceable regulatory instruments governing the future operation of the proposed quarry. The Site Plans and referenced supporting documents must be clear and unambiguous. This is not presently the case. Therefore, these Site Plans cannot be approved in their current form. I recommend council not approve the rezoning of the proposed site at this present time due to the issues listed above and described in detail below.

1.1 Regulatory Site Plans

The latest version of the proposed Site Plans provided by the Applicant through the Township web site are dated March 19, 2015. The supporting site specific reports referenced on Page 1 of 5 of these Site Plans are for the most part dated 2012. The document stack and correspondence contain inconsistent and sometimes contradictory conclusions to the March 19, 2015 Site Plans. For example, the blasting impact analysis contradicts the blasting direction shown in the noise impact analysis.

My conclusion is that each individual study component has presented optimal operational plan and recommendations without sufficient 'balancing' of other discipline operational



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requirements. In many cases, agency reviews and peer review consultants also follow this 'silo' approach. As a result the March 19, 2015 Site Plans are not consistent with and supported by the underlying fundamental Noise, Blasting and Hydrogeology Studies. The following issues have not been taken into consideration.

1.2 Extraction Progress Direction

The Noise Impact Study updated May 24, 2013 specified directions of extraction contradicts the September 5, 2014 Blast Impact Analysis directions of extraction. The direction of extraction on the March 19, 2015 Site Plan pg 2 of 5 Operation Plan is not consistent with either of the Blasting and the Noise Studies (Fig 1.2 to 1.4). This conflict in extraction directions may affect the respective Blasting and Noise receiver calculations and recommendations including noise berm heights.

Coordination and rationalization are required throughout the document set. A good example of how this type of contradiction affects the operational parameters of the quarry is how the orientation of the aggregate extraction operation will be designed and maintained so that the direction of the overpressure propagation and fly rock from the face will be away from residents' homes (September 5, 2014, Blast Impact Analysis - Recommendation 4, pg 20).

1.3 Maximum Depth of Extraction

The proposed subaqueous floor of the quarry was revised by the Applicant in June 2014 to only allow extraction to 327 m asl instead of the previously proposed 320 m asl. The 327 m asl floor is about 3 m above the central 324 m asl zone of the M15-2 'production aquifer' as monitored by the Applicant at multi-level groundwater monitor M15. The Applicant monitor M15-2 is screened from 326.5 to 322 m asl. The quarry floor is likely to be irregular and fractured due to drilling and blasting. The M15-2 production aquifer will be the primary influence on the final extracted quarry lake levels.

This extraction depth limit (327 m asl) is expressed throughout the March 19, 2015 Site Plan versions. The maximum extraction depth below the top of bedrock is about 25 m. However, the Noise and Blast Impact Analysis Update Reports and Peer Reviews do not recognize this 327 m asl extraction depth limit and are based on the Applicant's earlier proposed 320 m asl extraction depths. Similarly, the Hydrogeology Reports prior to June 2014 are based on extraction to the proposed 320 m asl elevation.



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The Noise, Blasting and Hydrogeology Reports need to be updated to reflect the actual extraction depth limit of 327 m asl as agreed by the Township Peer Review Consultant and the Applicant and as now contained on the March 19, 2015 version of the regulatory site plans. Blast loading calculations will potentially be affected.

1.4 Recommendations and Operational Pit Floor (Top of Bedrock)

The November 19, 2012 Noise Report and Update of May 24, 2013 (pg 6 of 13) states:

'The permanent processing plant area should be established at an elevation of 349 m (asl) and a truck haul route connecting the processing plant area to the Stage 1 Phase 1 extraction area should be excavated to the same 349 m (asl) elevation.'

•	Processing Plant	349	m asl
•	Shipping Loader	349	m asl
•	Shipping Truck	349	m asl
•	Drill	350	m asl
•	Extraction Loader	350	m asl
•	Rock Truck	350	m asl
•	Rock Trucks	349.5	m asl

The March 19, 2015 Site Plans (Fig 1.2, 1.3, 1.6 and 1.8 enclosed) do not show the processing area operational pit floor and internal haul roads at 349 m asl as recommended by the Noise Study. The Noise Report sample noise calculations for Receiver R3 (W5) utilizes the operational pit floor staging area elevations. These elevations are illustrated in more detail on Fig 1.5. The presumption, although not stated, is that these are dry pit floor elevations.

Furthermore, the internal haul route at 349 m asl is located along the west noise berm and will impose maximum groundwater drawdowns (say at 348 m asl) immediately on initiation of full depth overburden excavation notwithstanding the frequent Applicant Hydrogeology Study statements that draw-downs will be imposed gradually over a number of years.

There is no evidence that the Noise studies consider the internal inclined ramp haul route proposed to cross Tributary 'B' at $360 \pm m$ asl. The Rock Haul Truck noise source is 2.5 m above ground, nearly equal to the surrounding noise berm heights. It is questionable if the acoustic berms at the proposed heights will actually perform effectively as a noise barrier and/or a visual impact barrier for this condition.

Sample calculations for additional sensitive Noise Receptors R16 (W19) and R12 (W10) should also be included in the Noise Report (Fig 1.1A) so these nearby residents are aware of the predictions for their homes.



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1.5 Brook Trout Spawning

Active Brook Trout spawning beds were identified by Dr. Karl Schiefer during an aquatic ecosystem and fish survey of the Brydson Creek headwater. The Creek headwaters are located within 225 m of the Hidden Quarry licence boundary, 350 m of the overburden extraction and 425 m of the Site Plan bedrock extraction limits. The note below should be included in the Site Plan Blasting Notes on pg 2 of 5 with reference to the Schiefer Fisheries Study (January 2015).

".....spawning beds within a 300 m radius surrounding the site may be subjected to vibrations in excess of the DFO limit of 13 mm/s. In the event that active spawning beds are identified within 400 m of any planned quarry blast, vibration monitoring will be required at the shoreline adjacent to the spring area, or closer to the blast, in order to ensure compliance with DFO limits for ground vibration." (from the September 5, 2014 Blast Impact Analysis Update Report)

In addition, potential extraction within the 165 m receptor R16 setback limits will encroach on the 400 m buffer distance and have adverse implications for Brydson Creek Brook Trout spawning areas (Fig 1.1A). It is unclear from the Site Plan if the 165 m Blasting Impact Analysis line is the true extraction limit. The Site Plans (pg 3) state

'Drilling and blasting will not occur within a distance of approximately 165 m to the adjacent sensitive receptor(s). Should the blasting pattern be revised, extraction may occur within this setback.' (pg 3 of 5, March 19, 2015 Site Plans)

This Quarry Operation Note is conflicting and more permissive than the Site Plan legend note for R16. Extraction within 165 m of R16 would trigger requirements for vibration monitoring. The second sentence of this Site Plan note should be deleted. Dolostone extraction within 165 m of receptors should require a Site Plan amendment.

1.6 Liquefaction of Hydraulic Barrier and Geotechnical Stability of Intercell Rock Pillar

William Hill Mining Consultants Limited in a January 31, 2015 Appraisal of the Applicant's Blasting Impact Analysis Studies and Peer Reviews, expressed concern about possible 'liquefaction' of the Applicant's proposed Northwest Wetland hydraulic barrier impervious core as a result of nearby blasting shockwaves. The applicant has provided examples of hydraulic barriers that have been used to confirm the utility of its proposed barriers. However, the Three Hydraulic Barrier analogues referenced by the Applicant (February 2001) for Heritage Lake and Caledon Sand Gravel Pits are constructed adjacent to Sand and Gravel Pits not in Quarries where blasting is required. The **applicant should provide more appropriate examples to justify the utility of the proposed hydraulic barrier**.



The various blasting limits and caution zones as discussed by Mr. Hill and other limits as discussed in this report are illustrated on Fig 1.1A enclosed. These concerns have been partially addressed in the Explotech letter of April 10, 2014 which did not become available to Mr. Hill until March 4, 2015 after issue of his report.

Mr. Hill also expressed concern about the geotechnical stability of the intercell rock pillar supporting Tributary B between Phase 1 and 2 area of the quarry.

1.7 Site Plan Blasting Limits

1.7.1 Special Precaution (250 m)

The 250 m encroachment distances need to be shown on the Site Plan together with the note below. Site Plan notes should state what these special precautions might be (see also Golder October 1, 2014 and Hill January 31, 2015) (Fig 1.1A).

'Special precautions must be implemented when operations encroach within 250 m of any sensitive receptor. All blasts shall be monitored at the nearest sensitive receptor as extraction retreats toward the structures to ensure constant compliance with MOE guideline limits....' November 16, 2012 Blast Impact Analysis

The March 19, 2015 Site Plan version are not consistent with this recommendation.

1.7.2 Blasting Hygiene

In response to my May 20, 2014 Query No. 58 concerning water quality and the blasting management protocols employed at Guelph Dolime Quarry to minimize spillage, reduce product leaching, reduce undetonated explosives and reduce incomplete combustion the applicant stated that:

'At Guelph Limestone Quarry, JDCL uses waterproof emulsions, blast tubes and excellent hygiene to minimize spillage, leaching and incomplete combustion. Explosives are used within manufacturer's specifications for sleep times.'

The updated Blasting Report should include similar supportive text and recommendations to protect groundwater quality. The Applicant needs to integrate these protocols into the Site Plan notes.



1.7.3 Updated Site Plan Notes

Subject to the resolution of the William Hill Mining Consultant's Limited issues, the first paragraph on pg 2 of 5 of March 19, 2015 Site Plan 'Blasting' Notes should be revised as follows:

'The following conditions will be applied for all blasting operations at the proposed......'

The following additional notes should be added to the Site Plan (pg 2 of 5) Blasting Notes:

^{69.} Special precautions must be implemented when operators encroach within 250 m of any sensitive receptor including the 6th Line and Highway 7.' (Specify precautions?).

'10. The actual point of termination of blasting operations will be governed by the results of the on-site monitoring program and market economies. However, quarrying closer than 165 m to a sensitive receptor will require a Site Plan Amendment.'

'11. A waterproof emulsion will be used for explosives. The emulsion will be placed in drill holes fitted with tubular linings.'

'12. Use of explosives will conform with manufacturer's specifications for sleep times.'

'13. Excellent hygiene will be employed to minimize spillage, leaching and to ensure complete combustion as evidenced by white smoke.'

'14. The presence of yellow orange 'smoke' during blasting will trigger review of protocols and resultant post blast water quality.'

1.7.4 Contradictory Acoustic Berm Top Elevations

The Blasting Impact Analysis and the Noise Studies show the north berm elevation at 364 m asl whereas the Site Plan Phase 2 (pg 2 of 5) shows this **berm at 363 m asl (Fig 1.7)**. **This may be a drafting error on the Site Plans.**

1.7.5 Blasting Study Water Table Level

The water table level determined by the applicant with respect to the Phase 1 area, at Monitor M2 varies between 350 to 352 m asl (Fig 3.1 and Fig 4.2). In contrast, the September 5, 2014 Blasting Study assumes the groundwater table elevation is at approximately 349



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m asl. The method of water table lowering to conform to Blasting Study assumptions has not been addressed by the Applicant.

2.0 GROUNDWATER

The locations of most of the ground and surface water monitors and some of the domestic wells referenced in this report are shown on Fig 2.1 originally prepared by the Applicant as its Fig 4. Known water wells are also shown on Fig 1.1A employing the Applicant 'W' terminology. Well (W50) on the 7th Line (Eramosa) has been added by this Peer Review as a known bedrock well static water level reference.

2.1 Applicant's Mixed Season Bedrock Contour Water Levels (September 2012, Fig 3.17)

The Applicant's Fig 3.17 Bedrock Contour Water Levels from the September 2012 Level I and II Hydrogeological Investigation have been evaluated with respect to data quality and consistency (Fig 2.2 enclosed). The Applicant Fig 3.17 contains a mixture of wet season (May 31, 2011) and dry season data (November 11, 2011) which distorts the bedrock water level contours as presented and apparently the subsequent groundwater modelling calibration as well.

The Applicant's bedrock water table contours are distorted in the southeast corner of the quarry and no water levels at all are documented east of M4 and suspect M3. These water levels should have been available for the determination of accurate bedrock water level contours. The area east of Tributary B may at best be described as 'inferred', 'extrapolated' or 'improvised'. The complete absence of dry season water level monitoring and the absence of wet season monitoring in the southerly Phase 2 area together with the improvisation of bedrock water levels distorts the baseline monitoring record and subsequent groundwater model calibration.

Other technical issues include:

- Suspect monitor M3 near Tributary 'B' in the north-central setback of the quarry shows little seasonal variability and has lower static water levels than its neighbour monitors (Fig 2.1). This suspect monitor appears to have a 'plugged' screen (Fig 3.1 and 3.2). There are no nearby redundant bedrock water level monitors to the east. This is the only bedrock water level monitor in the Tributary B corridor.
- The Applicants utilized the November 2011 dry season water level of 346.0 m asl observed at the Applicant's rental house well W1 and the Brydson Farm house well W16 at 345.67 m asl in



Ms. Kim Wingrove Chief Administrative Officer Township of Guelph/Eramosa May 15, 2015 Page 11 of 56

the construction of its Fig 3.17 (Harden, September 2012). Suspect M3 and these dry season bedrock water levels are the primary determinants of the contours on the south and east sides of the proposed quarry site in the Phase 2 area.

- There are no confirmed wet season bedrock water levels in the vicinity of W1, W10 and W16 or considering suspect monitor M3 any bedrock water level contours in all of the Tributary 'B' corridor.
- There are no confirmed wet and dry season bedrock static water levels in the TP8 area in the northeast corner of the proposed quarry.
- At subsequent Monitor M15, the 2014 wet season bedrock water levels are about 1 m higher than shown on Fig 3.17.

In summary, dry and wet season monitoring at W1 and new monitors M16, M20(TP8) and M21 (M3) are required to provide baseline information in the eastern part of the quarry to correct this distorted data, improve the critical groundwater modelling predictions and provide guidance for Phase 2 design and impact assessment.

Furthermore, the Applicant's Tributary B hydrogeological conclusions are suspect.

2.2 Groundwater Modelling

The Applicant places an inordinate amount of faith in its suspect groundwater modelling and resultant overly precise prediction of the final post extraction west quarry lake water level at 348.6 m asl and the east quarry lake at 348.4 m asl (pg 2 of 5 March 19, 2015 Site Plans). No seasonal variation is reported despite the seasonal variations evident in the functioning bedrock aquifer monitors (M1D, M2, M4, M15 etc) (Fig 3.1, 3.2 and 3.3).

2.2.1 Audit of Model Input Data

The Proponent's September 2012 Groundwater Model Report (Appendix H) states:

'.....Information gathered from the MOE Water Well Records (WWR) and on site wells were used in the creation and calibration of the model.' (pg 1)



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'The purpose of the model is to provide an estimate of the drawdown that will occur in the bedrock aquifer as a result of the quarry development' (pg 1)

I previously requested the data utilized to create and calibrate the model but the Applicant has never responded.

2.2.2 Adversely Affected Groundwater Model

It is apparent that the Applicant's groundwater model has been adversely affected by the data input including the mixing of wet and dry season site data, MOE water well static levels not corrected to the GRCA 2011 ground elevations and the near complete absence of water level data in the proposed Phase 2 area (Fig 2.2).

- The Applicant's letter to the Region of Halton (August 1, 2014) shows in Fig 4 the Brydson Spring at about 340 m asl, the Allen well at 354 m asl, the Allen Spring at 355 + m asl, the De Grandis Ponds at 358 m asl, the De Grandis Bored Well at 359 m asl and W50 (MOE 67-11476) on the 7th Line at 361 m asl (Fig 1.1A, Fig 2.4A and 2.5).
- Compared to the GRCA 2011 ground surface contours the Brydson Spring is at about 344 m al or about 4 m above the groundwater modelled contour. Similarly, the De Grandis Ponds are 3 to 4 m above the modelled contours. The static water level at W50 (MOE 67-11476 4978 7th Line Eramosa) bedrock well after correction to the GRCA 2011 ground elevation is 3.5 m above the Applicant's modelled contours (Fig 2.4B). An explanation is required.
- The Applicant's modelled groundwater contours show nearly 5 m of drawdown at W5 (67-07545), about 1.3 m at W3 (MOE 67-14491) and about 1.5 m at W9 (67-08039).
- In contrast, there is a close fit to the W1 (MOE 67-05424) at 0.65 m (345.4 346.05) and to W16 (MOE 28-05483) at 0.57 m (345.1 345.67) for November 2011 water levels employed in the Applicant's September 2012 Fig 3.17 (Fig 2.2) indicating these data points were used in the model calibration (Fig 2.4A and 2.4B).

The Applicant produced later model runs with adjustment for the M15-2 hydraulic parameters (Fig 2.3A and 2.3B). The first scenario provided on January 29, 2015 shows a post extraction drawdown of 1.4 m in the vicinity of M2 and about 1.2 m near TP8 in the



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northeast corner of Phase 2 of the quarry. The second scenario (not illustrated herein) shows a post extraction drawdown of about 0.8 m in the M2 area on the north side of the quarry.

In the alternative, the Applicant could also have updated its September 2012 Fig 3.17 (Fig 2.2) with its more extensive 2014 wet season monitoring including wet season water levels (assume bedrock) for M7, TP2, TP7, TP8 and TP9; an assumed wet season static water level say at 350 m asl at W1. GRCA 2011 water levels for the De Grandis Pond, Allen Spring and the Brydson Creek headwater pond and adjustment of water well static level depths to GRCA 2011 elevation data. Use of this data model calibration would produce a more realistic model result. However, there is no dry season data to allow the accurate simulation of dry season static water levels in the northeast Phase 2 quarry area.

The Applicant's hydrogeological model due to calibration inaccuracies, data gaps and absence of data in the proposed Phase 2 quarry area underestimates the drawdown impact north and east of the proposed quarry including the Allen Wetlands and the Allen Springs; the De Grandis Springs, Ponds and W31 Dug Well and on the W7 Dug Well.

Re-running the Applicant's suspect groundwater model is beyond the scope of this Peer Review. For purposes of this Peer Review, I have applied a 2x safety factor to the Applicant's suspect drawdown predictions.

2.3 Predicted Maximum Lake Water Levels (Post-Extraction)

The Applicant continues to place an inordinate amount of faith in groundwater modelling and resultant overly precise prediction of the final west lake quarry level at 348.6 m asl and the east quarry lake at 348.4 (pg 4, March 19, 2015 Site Plans). The Applicant's expectation based on its suspect modelling is that there will be maximum post extraction quarry water level change (drawdown) of 2.45 m at the quarry edge and 1.6 m at the nearest private well (pg 17 June 10, 2014 letter to Township Peer Review Consultant).

The Applicant however has not considered the Phase 1 Operational case where extraction is initially proposed on the upgradient side of the quarry and water levels must be lowered to meet the dry pit floor / top of bedrock as assumed in the Noise and Blasting Reports (Fig 3.1).

The Proponent's groundwater and related wetland ecological impact assessments are all based on these flawed assumptions.



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2.4 Drainage Ditch 'Tributary B'

A decades old constructed drainage ditch (SW5 to SW7 area) with inlet invert elevation at about 356 m asl and outlet at about 355 m asl drains flood waters from the Tributary B wetland depression within the proposed quarry site (Fig 2.1).

Prior to drainage ditch construction, flood waters from Tributary B were mainly retained on site, flooding to about the 358 m asl contour with greater recharge to the bedrock aquifer than occurs at present. This ditch through accelerated passage of floods has diminished dry season base flow to the downstream Brydson Springs and the Brydson Creek gaining stream. **Stopping up this ditch would restore the historic dry season base flow to Brydson Creek headwaters.**

2.5 Guelph Limestone Quarry not Valid as an Analogue for Hidden Quarry

The Applicant has reported the annual volume of water flowing through the Hidden Quarry site at 370,146 m³ (s 3.2 pg 6, December 9, 2014). This is equivalent to 1,014 m³/day. The Applicant reports Permitted Daily Discharge Rates from the Guelph Quarry at 13,750,000 L/day or 13,750 m³/day at Guelph Limestone Quarry (Fig 2.5). Pumping during the Applicant's Guelph Limestone Quarry water quality sample events in 2012 and 2014 was at about 10,000,000 L/day or 10,000 m³/day or about 10x the Applicant's estimated flow through in the proposed Hidden Quarry.

The Applicant's estimated groundwater inflow at the proposed Hidden Quarry is only about 10% of the pumped groundwater discharge rate at Guelph Limestone quarry at the time of water quality sampling. Therefore the water quality dilution factor is much higher (10x) at Guelph Limestone Quarry (s 3.1, pg 6, December 9, 2014). The Applicant's use of a volumetric comparison for water quality dilution and the use of this quarry as an analogue for Hidden Quarry is not valid without applying a correction (increase) to the Guelph Limestone Quarry water quality data.

By comparison on October 16, 2014 the Applicant observed the flow at the 'Brydson Spring' to be 22.4 L/s (December 9, 2014 correspondence). This flow is equivalent to 1,935 m³/day or about twice the estimated average annual flow through the quarry.

3.0 DRY OPERATIONAL QUARRY FLOOR AND ACTUAL OPERATIONAL DRAWDOWNS

The Applicant has not considered Phase 1 and 3 operational drawdowns required to initially operate the pit and quarry. The Noise Study (updated May 24, 2013), the Blast Impact Analysis (updated September 5, 2014) and the Site Plans (March 19, 2015) each specify the Phase 1 operating



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pit floor (Bottom of Sand and Gravel / Top of Dolostone) at 349.0 m asl, the Phase 2 Pit Floor at 354.0 m asl, and the Phase 3 Pit Floor at 350.0 m asl. This operating pit floor is intended to be at the top of bedrock and forms the dry staging platform for quarry drilling, blasting, subaqueous extraction, excavated shot rock stockpiling, shot rock drainage and for loading of quarry rockhaul trucks.

3.1 Top of Bedrock

The Applicant documents contain the following top of bedrock information. The word 'below' indicates top of bedrock is deeper than the specified base of borehole / test pit elevation.

Top of Bedrock Elevation (m asl)				
West Phase 1 & 3 Phase 2 East				
M13D	350.2	TP8	below 353.4	
M14D	349.8	TP4	below 352	
TP2	348.6	ТР9	352.1	
M1D	350	M3	350.7	
M1S	349.8	M11	below 349.3	
M2	352.5	W10 (67-05627)	344.4	
M12	below 353.2	W1 (67-05424)	344.8	
M3	350.7	W16 (28-05483)	340.9	
M7	below 349.6			
M4	349.1			
W19 (28-02048)	349.4			
W18 (28-02049)	347.9			
W17 (28-03457)	345.6			

The lower top of bedrock elevations at Water Wells W10, W1 and W16 indicate the Tributary B follows a bedrock depression in this area. This depression likely extends upgradient under the 'drained' wetland depression at the MP1, M9 and SW5 monitoring cluster between the proposed Phase 1 and Phase 2 quarry cells and downgradient to the Brydson Creek Spring(s) groundwater resurgence area.



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The available top of bedrock elevations throws into question the Applicant assumed bottom of overburden / top of bedrock Site Plan elevation of \pm 354.0 m asl within the proposed Phase 2 Quarry area. The overburden / bedrock interface is more likely to reflect surrounding Boreholes at 351 to 352 m asl and lower towards the W1, W10 and W16 bedrock depression leading to the Brydson Creek headwater.

3.2 Actual Operational Drawdowns (vs Modelled)

For purposes of this Peer Review, based on the Applicant's top of bedrock borehole data and the noise and blasting studies, the Phase 1 and 3 operating pit floors have been assumed at 349 m asl and Phase 2 at 351 m asl (Fig 3.1, 3.2 and 3.3). After allowing for establishment of water table drainage gradients, the minimum operational water levels required are assumed at 348 and 350 m asl respectively.

The Applicant did not provide full year tabular water level data as requested by Hunter for Years 2012, 2013 and 2014. Available values for 2014 are employed below for comparative purposes and adopted in the referenced Figures.

3.2.1 Phase 1 Operations (Fig 3.1)

The initiation of extraction of dolostone at the specified elevation of 349 m asl will require active or passive dewatering to a minimum 348.5 m asl to provide a dry staging area (equal to or below the predicted Final west Quarry Lake level). **Overburden and bedrock water table levels range from about 351 to 354 m asl in Phase 1, Stage 1 area implying required drawdowns of 2.5 to 5.5 m** (Fig 3.1). This data was collected from Borehole M2 (completed May 1990, just north of Phase 1 in the setback area), where bedrock at 352.53 m asl was observed. This borehole was extended to the base of the dolostone deposits.

In addition, M12 installed December 22, 2010 near M2 was extended to 353.16 m asl depth and the base of the installed piezometer screen was at 353.69 m asl above the top of bedrock. The Applicant did not observe an overburden watertable at M12.

The bedrock water levels in deep open hole M2 is similar but slightly higher than the water level in the downgradient M15-3 aquifer zone centred at about 333 m asl above the subaqueous quarry floor elevation at 327 m asl (Fig 3.1). Monitor M2 should therefore be reasonably representative of water levels in the proposed quarry.



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M2 Wet Season Hi	gh (m asl)	Dry Season Low	(m asl)
May 5, 2014	352.02	Aug 14, 2014	350.38
May 11, 2011	351.88	Sept 26, 2007	349.83
April 21, 2008	352.55	Oct 24, 2004	349.81
April 7, 2009	352.40	Aug 26, 2003	349.90
April 16, 2004	352.01		

The following wet season high and dry season low water levels have been observed by the Applicant at long term monitor M2 (two decades):

TP2 is located within the Phase 1 overburden extraction area as shown on the Applicant September 2012 Fig 3.17, Fig 2.1 and 2.2. Dolostone was reported at the base of TP2 at 348.62 m asl. The base of the screen was installed at 349.54 m asl above a silt layer. However TP2 and M13D display similar hydrographs in Fig 3.1. The following low and high water levels have been provided by the Applicant for TP2:

TP2 Wet Season High (m asl)		Dry Season Low (m asl)	
May 5, 2014	355.14	Oct 10, 2014	354.11
May 31, 2011	355.13	Jan 27, 2010	353.60
Apr 7, 2009	355.08	Sept 26, 2007	353.71
		Oct 24, 2005	353.76
		Mar 6, 2003	353.10

The water table in the Phase 1 area will need to be lowered to about 348.0 m asl to permit quarry staging operations, haul route and processing to be consistent with Noise and Blasting Study assumptions. This water table is lower than the Applicant's suspect model predicted final water table and lake level at 348.6 m asl. Notwithstanding the Applicant's contrary claims, the Applicant's Site Plan imposes the full drawdown on the north quarry perimeter during Phase 1 extraction and not progressively through the life of the quarry.

On May 5, 2014 the actual drawdowns required to lower the water level in Phase 1 to permit quarry operation at M2 is about 4.0 m and at TP2 is 7.0 m. On August 14, 2014 the operational drawdown required at TP2 is about 6 m and at M2 about 2.4 m (Fig



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3.1). With the exception of dry season M2, these actual drawdowns are greater than the Applicant predicted 2.45 m drawdown at the north quarry edge (s 2.3).

3.2.1.1 Dewatering (Phase 1)

The March 19, 2015 Site Plans, the Hydrogeology Studies and the extensive documentation do not address how dewatering of the Phase 1 area will be accomplished to lower the water tables to address quarry operations requirements, especially during May and June when water levels throughout the proposed Phase 1 area are significantly higher than 348 m asl.

Even at the M4 location (Fig 2.1) the maximum water level observed at 348.13 m asl on April 21, 2008 indicates the local quarry water levels will not be able to be passively lowered during some spring seasons. Recognizing that W10/W1 wet season water levels are likely about 350 m asl (s 3.2.2), M4 on the south Phase 3 quarry setback is the only area where the existing operating season water level most of the time is below (slightly) the Phase 1 operational drawdown required at $348 \pm m$ asl.

Furthermore, M4 static water levels represents the M15-4 aquifer with lower hydraulic heads than in the underlying M15-3 aquifer zone (see Table A footnote).

The Applicant's longer term (two decades) static water level monitoring from 1994

to 2014 at M4 indicates the following selected wet season high and dry season low water levels:

M4 Wet Season High (m asl)		Dry Season Low (m	asl)
May 5, 2014	347.60		
May 31, 2011	347.62	Oct 10, 2014	346.13
April 7, 2009	347.76	Oct 25, 2007	345.58
April 21, 2011	348.13	Mar 6, 2003	345.47
May 31, 2007	347.62	Dec 17, 1997	345.61



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By late July the M4 water levels decrease to about $346 \pm m$ asl (Fig 3.1). The dry seasonal water level at the Applicant house (W1) well in the Tributary B influence area appears to be similar to M4.

The Site Plans (pg 1 of 5) Table 1 'Description of Wells' reports M7 on the south quarry setback east of M4 as a Drivepoint Groundwater Monitor installed in April 1998 with base at 349.61 m asl and revised (deepened) in November 2010 to 349.31 m asl.

The Applicant reported the following wet season high water levels at M7 in the September 12, 2012 Appendix Table B2. No monitoring for M7 has been provided by the Applicant after early 2012.

M7 Wet Season High (m asl)			
Apr 1, 2011	349.51		
Mar 16, 2010	349.84		
Apr 29, 1998	349.48		

Unexplained, the April 29, 1998 water level is below the base of drivepoint as reported by the Applicant.

3.2.1.2 Wash Water and Silt Ponds

The March 19, 2015 Operations Plan (Page 2 of 5) proposes wash water and silt ponds upgradient of M4. Recharge mounding from washwater disposal may be anticipated to increase the water table in this area interfering with base line long term monitor M4.

However, the area upgradient of M4, due to normal water levels below 348 m asl, is the only logical area to locate a passive quarry recharge sump area with surface gravity drains from Phase 1 area.



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Site Plan Note 18 (pg 2 of 5)

"...Silt may be deposited in quarry ponds. A Permit to Take Water will be obtained from the MOE prior to any washing operations as required."

Site Plan Note 16 (pg 2 of 5)

'There will be no proposed water diversions or points of discharge to surface water from this site. Surface drainage will be allowed to percolate through the rehabilitated pit/quarry floor and reflect the existing surface drainage as much as possible.'

Percolation through the Phase 1 quarry floor is not possible without substantially lowering the water table.

At some of the Applicant's other Pits and Quarries (with approved MOE Permits to Take Water) the high 'spring flood' water is pumped from operating pits with disposal on the waxing and waning spring flood of nearby streams. However, this pumped water is lost to support subsequent dry season stream base flow.

Drainage from the industrial work area (processing area and silt pond) and Phase 1 Stage 1 extraction area will recharge near M4 unless mounding is present. Existing downgradient wells are in harm's way from a water quality viewpoint.

The Applicant has not demonstrated how it intends to dewater the Phase 1 proposed quarry area in the spring season without reducing subsequent dry season base flows in Brydson Creek.

3.2.2 Phase 2 (Fig 3.2)

The proposed Operating Pit Floor (bottom of sand and gravel / top of dolostone) is a consistent 354 m asl in the Noise, Blasting Reports and on the March 19, 2015 proposed Site Plan version. This Peer Review has assumed a Phase 2 pit floor at 351 m asl pit / quarry dry operational floor with a water table at 350 m asl (Fig 3.2) (see Sec 3.1 this report).



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> The Applicant has only three water table elevations in the immediate vicinity of the proposed Phase 2 area. There is no confirmation whether these are bedrock or overburden water levels.

> Suspect monitor M3 in the Tributary B corridor shows very little seasonal variation suggesting poor hydraulic connectivity with the bedrock aquifer and / or a plugged monitor (Fig 2.1 and Fig 3.1). M3 data should not be used until the monitor condition may be verified. There is no bedrock water level monitoring redundancy east of M3 or in the Tributary 'B' corridor. The Applicant's assumptions about surface water elevations vs bedrock levels in this losing stream corridor can not be confirmed.

Wet season high water levels at Tributary 'C' SW 14 wetland (Fig 2.1) include:

SW14 Wet Season High	(m asl)
June 23, 2014	359.024
May 5, 2014	359.194
May 31, 2011	359.18

A water level of 358.22 m asl was observed by the Applicant at SW14 on May 11, 2012 in the wetland east of TP8 on a neighbour property (Fig 2.1). This water level was slightly lower than observed at SW4.

SW4 wet season water high levels at the Tributary 'B' entrance to the Hidden Quarry site include:

SW4 Wet Season High (m asl)			
June 23, 2014	359.02		
May 5, 2014	359.19		
March 16, 2010	359.31		
March 12, 2009	359.32		
April 21, 2008	359.37		



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Wet season water high levels at Tributary 'B' SW 5 include:

SW5 Wet Season High (m asl)		
June 23, 2014	355.04	
May 5, 2014	355.3	
April 2, 2010	356.2	
April 3, 2001	356.27	

Water levels at downstream SW7 on March 16, 2010 were also at **356.15 m asl** (Fig 2.1). This elevation is inferred to be the **current overflow level of the Tributary 'B' central wetland depression** adjacent to the southwest corner of Phase 2. Tributary 'B' is dry at SW4 and SW5 during the dry season.

TP8 (Fig 2.1)Wet Season	Water Levels	observed	subsequent to	2011 include:

TP8 Wet Season High (m asl)		Dry Season Low (m asl)
Mar 29, 2012	354.80	No Data
May 11, 2012	354.19	
July 6, 2012	353.73	
May 5, 2014	355.47	
June 23, 2014	354.50	
Aug 14, 2014	Dry (?)	

TP8 is screened in the sand and gravel overburden aquifer and TP9 just above the dolostone contact. There is no evidence of an intervening aquitard.

The TP 9 (Fig 2.1) Wet Season High Water Level is reported at:

TP9 Wet Season High (m asl)		Dry Season Low (m asl)
Mar 29, 2012	352.25	No Data
May 11, 2012	352.29	
May 5, 2014	352.27	



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> In the absence of data from the Applicant TP8 and TP9 wet season water levels for purposes of this Peer Review have been conservatively assumed to be bedrock water levels. This assumption is further supported by the M13S and M13D near coincident static water levels in the northeast corner of the quarry. This assumption implies a preferential groundwater convergence flow zone through the M2, M15, M4, W1, W10 and W16 monitor areas near Tributary B and towards Brydson Creek.

> Based on the base of overburden / top of bedrock staging area floor at 351 m asl and an operational water table at 350 m asl to facilitate dry quarry staging operations, a wet season operational drawdown of about 5 m is required at TP8 and a drawdown of about 2 m at TP9.

> The Applicant's suspect model has predicted final lake level at 348.4 m asl. This predicted level would impose a spring time drawdown of up to 7 m at TP8 downgradient of the Allen wetland and 4 m at TP9 on the setback at the southeast corner of Phase 2.

> The Applicant shows his bedrock water level contour September 2012 Fig 3.17 (Fig 2.2) more than 4 m below the subsequent wet season water levels at TP9. The actual dry season water levels are unknown, as both TP8 and TP9 are dry through most of the operating season. No dry season water levels are available.

Known water well static water level elevations at W1 and W16 based on the Applicant's ground elevations are summarized below. W16 south of Hwy 7 is downgradient from W1 and W10.

When Completed (m asl)			Dry Season Low (m asl)		
W1	Feb 11, 1975	345.4	W1	Nov 2011	346.1
W10	July 24, 1974	348.2			
W16	Dec 17, 1979	345.1	W16	Nov 2011	345.7

The higher late July static water level (348.2 m asl) at W10 suggests wet season highs of about 350 m asl. The Applicant's W1 static level seasonal monitoring is deficient.



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- The actual operational drawdown required in the Phase 2 area **at TP8 is 4.5 m and at TP9 2.2 m** assuming an Operating Pit Floor at 351 m asl (not the Site Plan specified 354 m asl) and **operational water table at 350 m asl on May 5, 2014.**
- The drawdown required to conform to the Applicant predicted final east pond water level on May 5, 2014 was 7.1 m at TP8 and 3.9 m at TP9 based on the conservative assumption these water levels are bedrock water levels.
- These drawdowns are far in excess of the Applicant's predicted 2.45 m drawdown at the northern quarry edge.

3.2.3 Phase 3 (Fig 3.3)

The Phase 3 water table lowering is likely to be accomplished (if possible) during the Phase 1 pit excavations and the opening of the proposed quarry for dolostone extraction. Lowered water tables will also drain the shallow aquifers along the Phase 3 north and east perimeters and induce additional recharge from the Tributary 'B' corridor.

The Site Plan required operational drawdown in Phase 3 is to about $348 \pm m$ asl slightly lower than the model predicted post extraction water level 348.6 m asl (Fig 3.3). M4 static levels are less than 1 m below the required drawdown in the 2014 spring season and nearly 2 m below in the 2014 summer and fall seasons.

For the required Operating Season drawdown of 348 m asl on May 5, 2014, this operating level would induce a drawdown of 4.2 m at bedrock monitor M1D and on August 14, 2014 a drawdown of 3.3 m (Fig 3.3). For the Applicant Predicted West Quarry Pond Levels post-extraction drawdowns based on May 5, 2014 data for M1D would be 3.6 m and on August 14 2.7 m.

These M1D drawdowns exceed the Applicant predicted 2.45 m drawdown for the quarry edge.



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4.0 ADAPTIVE MANAGEMENT

This section sets Adaptive Management alert triggers that in a number of cases differ from those of the Applicant as expressed on pg 4 of 5 of the March 19, 2015 Site Plan version. Amber Alerts are warning that operational parameters are trending outside of a reasonable range and an immediate Applicant response is required. Red Alert indicates that stoppage of quarry extraction operations is necessary until the issue is corrected through mitigation or alternatively until the Quarry operator proves other factors are determinants.

4.1 Groundwater Monitor - Trigger Levels

This section describes groundwater level and quality Amber and Red Alert Trigger Levels. These alerts should be incorporated into the Applicant Site Plans.

4.1.1 Groundwater Monitor M4 (Fig 4.1)

The Applicant has not set trigger levels for M4. Static water levels at Monitor M4 as well as the existing domestic wells W1, W10 and W16 near Tributary B may be considered a surrogate for base flow to the downgradient Brydson Springs and the gaining Brydson Creek. Base flow decreases from the spring high season to the critical late summer and late winter low seasons.

M4 was completed May 1990. The base of M4 is at 337.23 m asl below the M15-4 aquifers with midpoint at 345.3 m asl and above the M15-3 aquifer zone with midpoint at 331.1 m asl. The critical summer / early fall water level in M4 seasonally declined from 347.6 m asl on May 5, 2014 to 346.1 m asl on October 10, 2014. Seasonal hydrographs for M4 are shown for the 2007 and 2008 dry years in Fig 4.1 enclosed.

Wet season passive or active dewatering may reduce subsequent dry season water levels at this monitor and adversely impact water balance and Brydson Creek base flow. The following dry season Adaptive Management Triggers are proposed at M4 for incorporation on the revised Site Plans.

Amber Alert346.1 m aslRed Alert345.3 m asl



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Fig 4.1 enclosed shows seasonal Amber and Red Alert hydrograph trend lines to provide early warning of dry season drawdown issues.

However, long term monitor M4 integrity is compromised by the March 19, 2015 Site Plan proposal to locate 'Silt Ponds' with washwater disposal upgradient of this monitor. Pit floor recharge sump(s) upgradient of the monitor may also be required in this area for passive drainage and recharge.

High level seasonal triggers are also required at M4 to avoid root zone flooding of a downgradient kettle depression woodland. The following initial triggers are proposed:

Amber Alert	348.6	m	asl
Red Alert	349.2	m	asl

4.1.2 M2 Adaptive Management (Fig 4.2)

The Applicant has set the following trigger levels at M2 (Fig C3 June 10, 2014).

Amber Alert	348.31 m asl
Red Alert	347.81 m asl

These Alerts have been adjusted downwards to reflect the operational Site Plan assumptions (Fig 4.2).

Amber Alert	348.0 m asl
Red Alert	347.7 m asl

These Alert levels are recommended to 'override' the Applicant's sinking cut trigger operational levels proposed in s 4.1.3.

4.1.3 Phase 1 Sinking Cut

The Applicant has confirmed that the maximum depth of the quarry is achieved during the first blast of the sinking cut and that therefore all fractures to the depth of the subaqueous quarry floor depth will be exposed. The Applicant advises that drawdowns in the sinking cut due to rock removal at the maximum extraction rates will initially be about 900 cm/day decreasing to about 8 cm/day at the full extent of Phase 1 area extraction.



The Applicant has proposed a maximum drawdown of 2.54 m (346.83 m asl) in the sinking cut (pg 17 or 19, June 2014 correspondence). The Applicant has referenced this drawdown to the low water level in M3 at 349.37 m asl. However M3 is a 'suspect' monitor with little seasonal water level variation and is not an appropriate reference.

The minimum allowable water elevation in the sinking cut should be referenced to a new replacement monitor at M3 with similar alerts as at M2 (Fig 4.2) as above:

Amber Alert	348.31 m asl
Red Alert	347.81 m asl

4.1.4 M13D Adaptive Management

The Applicant has set the following trigger levels (Fig C.4, June 10, 2014) for M13D and pg 4 of 5 March 19, 2015 Site Plan version (Fig 4.3).

Amber Alert	351.63 m asl
Red Alert	351.28 m asl

These drawdowns imply about 4 m drawdown at adjacent domestic well W5 with static level at 355.4 m asl when completed on May 13, 1981.

4.1.5 Northwest Wetland and SW6

Sample SW6 hydrographs are shown for reference on Fig 4.3. SW6 has been proposed by the Applicant as the water level trigger Alert station for the Northwest Wetland. A high level overflow to the quarry excavation is proposed at 355.8 m asl.

The appropriateness of the Northwest Wetland Adaptive Management Trigger levels have not been addressed by this Peer Review.

4.1.6 M1D Adaptive Management (Fig 4.4)

The Applicant's Fig C2 (June 10, 2014) and pg 4 of 5 March 19, 2015 Site Plans provide the following triggers for M1D:



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Amber Alert	349.98 m asl
Red Alert	349.78 m asl

These trigger levels do not recognize the adjacent processing operational floor and haul roads estimated at 349 m asl with a seasonal water table drawdown to about $348 \pm m$ asl to conform to noise and blasting protection requirements. Considering the upgradient location, practical operational trigger levels are recommended as follows:

Amber Alert	348.5 m asl
Red Alert	348.0 m asl

The Red Alert level is at the base of the monitor screen. This Monitor was completed in May 1990. A deeper monitor replacement (M24) is required to ensure that the monitoring range is appropriate (Fig 2.1).

4.2 Groundwater Quality

The Applicant has provided base line and surface water quality both within and adjacent to the proposed Hidden Quarry and at Guelph Limestone Quarry as an analogue (Table A enclosed). However, the Guelph Limestone Quarry sampling is restricted to early season February and April sampling (Fig 2.5) at the time of active quarry discharge. No late operation dry season (Aug/Sept) samples have been provided (Fig 2.5) after a summer period of frequent blasting. The Guelph Limestone Quarry discharge at the time of sampling was 10x the Applicant's estimated flowthrough at the Hidden Quarry site (s2.5).

This water quality data demonstrates that the existing Hidden Quarry aquifers are not pristine and contain anthropogenic affects originating from local land uses. The 'reasonable use' capacity of the existing local aquifers to absorb additional adverse quarry water quality impacts is therefore much more limited at Hidden Quarry than at the high flow Guelph Limestone Quarry site. The Applicant's comparisons are not valid.

I do not agree with the Applicant's assumption that it can monopolize the full residual Reasonable Use of the proposed Hidden Quarry aquifers, i.e. the ODWS (2006) or above the 95th Percentile (January 14, 2014 Applicant Letter pg 16). There may be other adverse upgradient water quality trends and downgradient home owner site conditions that may adversely affect the local source drinking water aquifer environment.



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Table A enclosed provides a summary of available selected water quality parameters for the proposed Hidden Quarry Area and for Guelph Limestone Quarry. The Applicant's proposed Hidden Quarry water quality sampling is relatively comprehensive. However, the Guelph Limestone Quarry water quality sampling is not comprehensive and biased to single sampling in the spring wet season. The Applicant's November 2014 domestic water quality is only partially available to this Peer Review (see Table A enclosed). No comment is made as to observed water quality at unknown private well locations.

Water quality monitoring should be undertaken in late August / early September each year.

4.2.1 Sodium

A review of the Applicant's and Private Water Quality Data confirms monitored Sodium levels are generally below 10 mg/L except downgradient of Highway 7 at W16 (67 mg/L - November 3, 2014) where Sodium exceeded the Medical Advisory level of 20 mg/L and at Brydson Creek Spring where Sodium increased from 15 mg/L in 1996 to 27.3 mg/L in 2014.

Sodium was also elevated above Medical Advisory levels at 24 mg/L at deep M1D and at 50 mg/L at shallow M5 sampled sites east of the 6th Line Eramosa. Deep M13D had slightly elevated Sodium level at 14 mg/L. Sodium in the Applicant's Guelph Linestone Quarry was higher at 80 mg/L on February 15, 2012.

The following trigger Level for Sodium in wells downgradient of the quarry is proposed for wells with existing Sodium below 10 mg/L. These proposed trigger levels, reflecting existing ambient conditions, are lower than the ODWS (2006) Medical Advisory of 20 mg/L.

Amber Alert	12	mg/L
Red Alert	15	mg/L

4.2.2 Iron

The aesthetic objective for iron, set by appearance effects in drinking water is 0.3 mg/L (ODWS 2006). Iron was non-detectable in the 2014 private well water quality surveys by the Applicant as included in Table A.



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Iron was also non-detectable in the 2014 samples for the Hidden Quarry site monitor wells except for the Applicant rental house W1 at 0.99 mg/L or 3x ODWS (2006). In 2012 W1 had iron at 0.14 mg/L. The chemistry of this well is anomalous.

Elevated iron was observed in the 1996 Monitor well samples. Based on existing ambient conditions, the following trigger levels for Iron are proposed:

Amber Alert	0.15 mg/L
Red Alert	0.20 mg/L

4.2.3 Manganese

The colour related aesthetic objective for manganese in drinking water is 0.05 mg/L. Like iron, manganese is objectionable in water supplies because it stains laundry and fixtures black, and at excessive concentrations causes undesirable tastes in beverages.

M1D at 0.058 mg/L slightly exceeded ODWS (2006). Exceedances also occurred at monitors M2, M5 and TP1 in 1996 (Table A). Elevated Manganese was observed at the Guelph Limestone Quarry Pond in 2012 and at anomalous W1 in both 2014 and 2012 sampling. Measurable Manganese was observed at M15-2 and M15-3 monitor in 2014. Measurable (trace) Manganese was observed at W4 in 2014 and at W31 in 2012.

Based on existing ambient conditions, the following triggers for Manganese are proposed:

Amber Alert	0.15 mg/L
Red Alert	0.03 mg/L

4.2.4 Hardness

Hardness in excess of 500 mg/L in drinking water is unacceptable for most domestic purposes. The following Hardness Trigger Levels are proposed, based on local ambient groundwater conditions as summarized in Table A.

Amber Alert	420 mg/L
Red Alert	450 mg/L



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4.2.5 Total Dissolved Solids (Calculated)

Total Dissolved Solids (TDS) is a measure of the palatability of drinking water. TDS levels less than 500 mg/L are generally considered to be good. The principle constituents of TDS are chloride, sulphates, calcium, magnesium and bicarbonates. Excessive hardness, taste, mineral deposition or corrosion are common properties of highly mineralized water (ODWS 2006).

Based on the Applicant's water quality sampling, most wells have TDS in the range of 360 to 450 mg/L (Table A). Exceptions include M15-1 (deep) at 470 mg/L, W16 also adversely influenced by road salt at 540 mg/L and anomalous W1 at 600 mg/L on November 3, 2014 and 613 mg/L on May 18, 2012. Based on existing ambient conditions, the following alerts are recommended:

Amber Alert	450 mg/L
Red Alert	475 mg/L

Active quarry activity and use of the quarry pond for washwater silt disposal is likely to contribute to increased TDS and Turbidity levels in the domestic wells downgradient of M4.

4.2.6 Turbidity

Control of turbidity in drinking water systems is important for both health and aesthetic reasons. The substances and particles that cause turbidity can be responsible for significant interference with disinfection, can be a source of disease-causing organisms and can shield pathogenic organisms from the disinfection process.

In contrast to the very high turbidity observed in the Guelph Limestone Quarry Pond following blasting, turbidity was very low in SW4, SW8 and SW11 with surface water meeting ODWS (2006) criteria. The Applicant did not analyze for Turbidity in its routine water quality surveys. This is a deficiency.

The following alerts are recommended for Turbidity:

Amber Alert	3.0 NTU
Red Alert	4.0 NTU



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4.2.7 Zinc

Zinc at all sample sites was significantly below the ODWS (2006) taste related aesthetic objective of 5 mg/L for drinking water. However, Zinc is frequently elevated above Provincial Water Quality Objectives at 0.03 mg/L (PWQO 1999) for both surface water and groundwater (Table A). At Brydson Spring on October 16, 2014 Zinc was at 0.035 mg/L, slightly above the Provincial Objective. Zinc in the proposed Hidden Quarry groundwater monitors in November 2014 ranged from 0.036 at M15-3 to 0.65 at M1D. The single February 2012 Guelph Limestone sample was 0.057 mg/L or about 2x the PWQO (1999).

The environmental significance of zinc relates to potential dewatering of the Phase 1 extraction area with discharge to Tributary 'B' to reduce high spring water levels. The following trigger values based on the Applicant's water sampling are recommended for zinc. Reflecting ambient conditions, the operational trigger values proposed are above PWQO (1999) for water discharge to Tributary 'B' of Brydson Creek.

Amber Alert	0.03 mg/L
Red Alert	0.04 mg/L

Alerts other than ODWS (2006) do not appear necessary for drinking water, recognizing that piping systems may be the source of zinc in domestic water supply systems.

4.2.8 Cobalt and Lead

Total Cobalt and Total Lead at Guelph Limestone Quarry pond in the February 15, 2012 sample also exceeded Provincial Water Quality Objectives (1999). Cobalt and Lead were non-detectable at proposed Hidden Quarry Groundwater Monitor M15 and in Hidden Quarry surface water.

The Applicant considers that Cobalt and Lead exceedances reflect the influence of the overlying Eramosa formation at Guelph Limestone Quarry. The Applicant has not identified the Eramosa Formation at the Hidden Quarry site however this formation may occur to the north. The Township Peer Review Consultant has also confirmed that the Eramosa Formation does not occur at the Hidden Quarry Site. Therefore, Amber and Red Alerts have not been specified.



4.2.9 Benzene

Measurable Benzene was observed at Guelph Limestone Quarry quarry pond samples. The proposed trigger levels are:

Amber alert	0.003 mg/L
Red Alert	0.005 mg/L

4.2.10 Un-ionized Ammonia

The Applicant provided only one 'grab' sample analysis in the 2012 wet season for unionized Ammonia at Guelph Limestone Quarry. No analysis was performed at the Hidden Quarry site. Analysis of un-ionized Ammonia will be important if future quarry water discharges are proposed to the Brydson Creek tributaries.

4.2.11 Nitrate-Nitrogen

Observations of Nitrate (NO₃-N) on the upgradient side of the quarry ($W^{\frac{1}{2}}$ Lot $\frac{1}{2}$ Conc 6 Boundary) for wells and stream water included the following concentrations:

Upgradient 1	Nitrate Concent	trations (mg/L)
M2	4.0	Nov 11, 2014
M2	4.6	Nov 20, 2013
M2	6.8	Nov 21, 1996
M3	1.1	Nov 11, 2014
M3	5.2	Nov 20, 2013
M3	5.3	Nov 21, 1996
SW4	1.1	Nov 5, 2014
SW4	4.64	Apr 8, 2014
M13D	3.55	Nov 11, 2014
W5	4.66	Nov 5, 2014
W4	2.90	Nov 14, 2014



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Extraction Zone	Nitrate Concent	rations (mg/L)
M15-4	2.3	Nov 11, 2014
M15-4	2.0	May 5, 2014
M15-3	2.3	Nov 11, 2014
M15-3	3.2	May 5, 2014
M15-2	2.0	Nov 11, 2014
M15-2	2.2	May 5, 2014

The Nitrate level in shallow M15-4 (345 m asl) and deeper M15-3 (333 m asl) within the Phase 1 ambient quarry extraction depth zone were:

On the downgradient side of the proposed quarry, the following Nitrate concentrations were observed by the Applicant:

Downgradient Nitrate Concentrations (mg/L)		
M4	2.5	Nov 11, 2014
M4	2.8	Nov 21, 1996
SW8	4.5	Apr 8, 2014
Stream (Trib 'B')	8.2	Nov 21, 1996
SW3	9.0	Nov 21, 1996
Brydson Spring	2.4	Oct 16, 2014
Brydson Spring	1.8	Nov 21, 1996
W16	1.4	Nov 3, 2014
W19	2.0	Nov 3, 2014
W1 Applicant Well	ND	Nov 3, 2014
W1 Applicant Well	0.13	May 18, 2012



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The data is clear that the recent ambient Nitrate (NO_3) concentrations on the north quarry boundary are mainly below 5 mg/L. At shallow M15-4 and deeper M15-3 the Nitrate concentration ranged from 2 to 3 mg/L, along the proposed south quarry boundary from 1 to 3 mg/L and at Brydson Spring at 1.8 mg/L in 1996 increasing to 2.4 mg/L in 2014. Brydson Spring Nitrate concentrations are similar to M15.

The water quality data at W1 is anomalous with very low nitrates compared to all other sampling locations (Table A enclosed). This is not an appropriate monitor to conclude that the ambient aquifer has the capability of naturally reducing nitrogen concentrations (January 14, 2014 Applicant letter, pg 3&4). Similarly, there is little evidence in Table A to support the Applicant conclusions that Nitrogen is being naturally sequestered in the Tributary 'B' and other wetlands. The SW8 Nitrate concentration at 4.5 mg/L on April 8, 2014 and stream (Trib 'B') at 8.2 mg/L in 1996 and SW3 at 9.0 mg/L in 1996 indicates Tributary 'B' is a Nitrate source to the proposed quarry site.

The Applicant reported Nitrate concentrations in a Guelph Limestone Quarry sump at 1.2 mg/L on February 15, 2012. The Applicant sampled the quarry pond on April 28 and 29, 2014 prior to and following a blast (12 min, 78 min and 15 hours). The sampled water was noted to be very turbid and Total Ammonia to be non-detectable with Nitrate-N at 0.47 mg/L before and 15 hours following the bast. Total Kjeldahl Nitrogen (TKN) increased from 0.31 mg/L prior to the blast to 0.43 mg/L immediately following the blast returning to 0.29 mg/L after 15 hours (see enclosed Table A). The Applicant considers these concentrations to be representative of its quarrying practice. However, these samples are wet season samples when quarry inflow and discharge was high. Late summer dry season sampling after frequent blasting activity would provide more realistic sample values for comparison to Hidden Quarry site (Fig 2.5). Furthermore, the dilution flow at Guelph Limestone Quarry is 10x that at the proposed Hidden Quarry (s2.5). Direct comparisons with Hidden Quarry are not valid.

The Applicant (December 9, 2014) based on a Nitrogen Balance calculated the resulting Nitrate loading at the proposed Hidden Quarry to be 3.67 mg/L on an annual basis. However, the Applicant observed that its calculation did not make allowance for losses as nitrogen gas. The Applicant has also predicted Nitrate attenuation in the subaqueous quarry environment. The Township's Peer Review Consultant estimated the Nitrogen added from explosives to be about 2 mg/L (April 8, 2014).

Therefore, considering aquifer Reasonable Use principles, the proposed Hidden Quarry should not be permitted to raise Nitrate concentrations in the downgradient ambient groundwater flow system by more than 1 to 2 mg/L. The following Alerts are



recommended for Nitrate (NO_3-N) concentrations on the downgradient side of the quarry.

Amber Alert	3.5	mg/L
Red Alert	5	mg/L

4.2.12 Organic Nitrogen

ODWS (2006) reports that taste and odour problems are common with organic nitrogen levels greater than 0.15 mg/L.

The Guelph Limestone Quarry Samples documented by the Applicant on February 15, 2012 and April 28, 2014 had organic nitrogen ranging from 0.29 to 0.43 mg/L or 2 to 3x drinking water standards ODWS (2006).

Organic Nitrogen exceeded ODWS (2006) at most on-site Hidden Quarry groundwater monitors by a factor of about 2x. High concentrations were observed at 0.9 mg/L at M15-3 on May 5, 2014 and at 0.77 mg/L at M3 (suspect) on November 23, 2014.

Surface water Organic Nitrogen ranged between 0.11 to 0.56 mg/L. Organic Nitrogen at Brydson Spring on October 16, 2014 was 0.21 mg/L.

In contrast, six (6) domestic wells sampled November/December 2014, all had Organic Nitrogen below ODWS (2006). The domestic well data suggests inadequate purging of the Applicant's monitor wells prior to water quality sampling.

The following trigger values, based on Table A, are recommended for Organic Nitrogen at the monitors and at domestic wells downgradient of the proposed quarry.

Amber Alert	0.12 mg/L
Red Alert	0.15 mg/L

4.2.13 Hydrocarbons / Oil and Grease

Hydrocarbon and Oil and Grease should be absent from downgradient monitor and domestic wells. Water quality monitoring is required. Measured values in downgradient monitor wells above method detection limits should be considered Amber and Red Alerts.



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Amber AlertDetectibleRed AlertDetectible

4.2.14 Microbiology

The microbiological quality of drinking water is most important because of its association with waterborne diseases. For Escherichia Coli (E. Coli) and for Total coliforms:

Amber AlertDetectibleRed AlertDetectible

5.0 DOMESTIC WATER WELL INTERFERENCE

The applicant in the June 10, 2014 response to Burnside 'Table 9 Private Well Surveys' provides a summary of private well survey dates. The Applicant provided an update for domestic wells within 500 m of the proposed quarry on January 8, 2015. However, it has already been demonstrated that these surveys contain a number of deficiencies, especially beyond the Applicant's arbitrary 500 m distance. The record confirms that the Applicant did not always observed ground elevations, water levels and well infrastructure including stick-ups, casing diameter, casing depth, depth of well, depth to static level and pumping intake levels to correlate with the MOE water well records. The arbitrary selected 500 m area of monitoring was also not adequate. The well monitoring should have been extended to 1,000 m from the quarry site. Critical wells include bored and dug wells and those wells within shallow pumps.

Monitoring Well M15 provides the best evidence of actual ambient groundwater quality on the proposed Hidden Quarry site (Table A). The Applicant's 'sand packs' for its high quality multi-level monitoring well M-15 are centred at the following elevations:

Intervals	m asl
M15-4	345.3
M15-3	333.1
M15-2	324.3
M15-1	317.8

Note: The subaqueous quarry floor is proposed at 327 m asl



The 15-2 aquifer is the most productive aquifer and generally has the best water quality. **M15-2** equivalent is the preferred target aquifer for replacement private wells. M15-3 aquifer has slightly higher Nitrate-N than M15-2 and is located within the quarry extraction depth zone. M15-1 has lower natural quality due to increased hardness and total dissolved solids and is therefore not desirable as a water source.

This section also includes a description of the recommended replacement private wells within the influence area of the quarry.

5.1 Drawdown Impact on Upgradient Private Wells

There are four (4) known upgradient private wells that are vulnerable to Hidden Quarry drawdowns. One of these wells is located outside the Applicant's arbitrary 500 m Well Water Quality Survey distance. All four should be replaced with notes to this effect on the Site Plans.

5.1.1 W5 (MOE 67-07545)

- According to the MOE water well record, this well has a shallow pump set at about 4.5 m depth. The base of the open hole bedrock well is at 341.1 m asl, well above the proposed quarry subaqueous floor at 327.0 m asl.
- The static water level on well completion on August 13, 1981 was 355.4 m asl. This static water level is consistent with the Applicant's levels for nearby M13S at 354.84 m asl and M13D at 354.02 m asl as observed on August 14, 2014 (Fig 4.3).
- The Applicant has predicted drawdown at 0.9 m in this well (Fig 2.3A and 2.3B) and elsewhere advised that drawdowns in domestic wells would not exceed 1.6 m.
- However, the Applicant has also estimated the groundwater contour at 351 m asl or about **4 m of drawdown** at the W5 and M13D well sites (Applicant Fig 4 Response to Halton Region August 1, 2014 and Hunter Fig 2.4A and 2.4B).
- Drawdown to the Applicant's proposed Amber Alert (351.63 m asl) trigger level at M13D for W5 would be 3.8 m and to the Red Alert Level (351.28 m asl) would be 4.1 m nearly 2x the Applicant's 2.45 m drawdown prediction for the north edge of the quarry (Fig 4.3).



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• The Applicant should replace this well to the M15-2 equivalent aquifer depth prior to initiation of Phase 1 extraction preparation work.

5.1.2 W7 (No MOE Well Record)

- The Applicant has described this dug well (W7) in the E½ Lot 2 Conc 5 as 'inaccessible' and not surveyed (Fig 1.1A). However, the Applicant's Scenario 1 provided January 29, 2015 predicts a drawdown of 0.6 m (2 ft) at this well site (Fig 2.3A and 2.3B). This drawdown is likely underestimated and may be more than 1 m which may leave inadequate depth of water in the well.
- W7 may also be within the drawdown influence area of the Rockwood Municipal Wells.
- The Applicant should either properly inspect and describe this dug well or provide a new deeper replacement well to the M15-3 or M15-2 aquifer equivalent prior to initiation of Phase 1 extraction preparation.

5.1.3 W31 (No MOE Well Record)

- This old heritage stone lined dug well is located about 700 m north of TP8 in Phase 2.
- The Applicant has predicted about 50 cm of drawdown at this well in Ground Water Scenario 1 as supplied January 29, 2015 (Fig 2.3A and 2.3B). However, the actual Phase 1 and Phase 2 drawdowns are likely to exceed that estimated in Scenario 1. Bedrock aquifer drawdowns may be as much as 1.0 m (3 ft +) at this dug well.
- The Applicant in its Well Survey Memorandum of January 8, 2015 reported W31 as a shallow 3.8 m deep dug well with a static water level at 3.11 m depth on October 5, 2012. There was only 69 cm of water in the well or about 39 cm of available drawdown above the pump depth as observed on December 16, 2014 (see below). The Applicant did not report the pump depth. This well, despite the very limited operational drawdown available, supports more than 80 beef cows and calves and other livestock.
- The Applicant did not include Well W31 in its November 2014 500 m water quality survey apparently because W31 is more than the arbitrary 500 m distance selected for the survey.



• W31 and the adjacent De Grandis pond level was surveyed again on December 12, 2014 for this Peer Review by B. Hietkamp, P.Geo and G. Hunter, M.A.Sc., P.Eng. with the following findings:

	m	m asl
Ground Elevation (estimated from GRCA 2011)		364.4
Measuring Point (Stick Up) above ground level	0.45	364.85
Static Water Level (BMP)	2.95	361.90
Pump Intake Depth (BMP)	4.10	360.75
Depth of Water Above Pump Intake (BMP)	1.15	
Well Depth (BMP)	4.40	360.45
Surveyed Nearby Pond Water Level (BMP)	3.07	361.78

- Water in the dug well was very 'clear' with temperature at 8.5 °C and pH (field) at 7.76 on December 12. A water quality sample was taken and within three hours delivered directly to the Laboratory for analysis (see Table A).
- The water level in the well on December 12, 2014 was 0.12 m above that in the ponds to the south.
- The Applicant's proposed contingency plan on January 8, 2015 for the very first time includes drilling a new well despite the well exceeding the Applicant's arbitrary 500 m distance from the quarry boundary. The Applicant prior to this date denied any responsibility for this well. This 'contingency' is not included on the March 19, 2015 Site Plan versions and therefore is not enforceable directly through the Site Plans.
- This new replacement well to the M15-2 equivalent aquifer should be installed prior to any pit or quarry preparation and extraction, especially as the Applicant has not proposed any contingency for livestock watering in the event of loss of water.
- During dry seasons (late summer and late winter) under quarry drawdown conditions other local springs on this farm may be dry and not be available as alternative farm supply water sources for the De Grandis cattle herd.



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5.1.4 Domestic Well W24

Domestic well W24 completed August 15, 2004 has an observed static level at 5.1 m depth (350.9 m asl), recommended pump level at 6.0 m depth and total depth of 8.8 m. The Applicant (January 8, 2015 letter) reported static water level of 5.79 m and pump setting at 6.00 m or only 20 cm of drawdown available.

This well is located about 500 m from the proposed extraction limit. The Applicant has predicted minimal drawdown at this location (Fig 2.3A and 2.3B). However, the Applicant shows its modelled water level contours 2 m below the static water level as referenced to GRCA (2011) ground elevations (Fig 2.4A and 2.4B).

Based on the Water Well Record, the Applicants January 8, 2015 Well Survey reporting and M1D monitoring (Fig 4.4), this well requires replacement.

5.2 Water Quality Impacts on Downgradient Domestic Wells

The Applicant's extensive water quality sampling confirms that the Hidden Quarry Site has limited tolerance for additional surface and groundwater Nitrogen enrichment due to blasting and other on-site activities.

The following downgradient domestic wells along Highway 7 based on the Applicant's modelled reverse particle tracking Fig 2.4A and 2.4B are cased to top of bedrock with open holes to the following depth elevations:

Domestic Well	MOE #	Top of Bedrock (m asl)	Base of Open Hole (m asl)
W18	28-02049	347.9	330.2
W17	28-03457	345.7	322.5
W19	28-02048	349.4	335.4
W16	28-05483	340.9	338.7
W10	67-05627	343.3	328
W1	67-05424	347.8	Applicant Well 328.0



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These open hole bedrock wells are in the direct groundwater flow zone above the 327 m asl subaqueous quarry floor as specified on the March 19, 2015 Site Plan versions.

These wells, with the exception of W1 owned by the Applicant should be replaced with wells cased to about 325 m asl and extended as open holes through the production aquifer as defined by the upgradient M15-2 borehole interval. The Applicant W1 well has anomalous and adverse water quality compared to the other private wells in Table A.

5.3 Drawdown Impacts on Allen Wetlands, Allen Springs, De Grandis Ponds and Brydson Springs

The Applicant has not provided any borehole and water level monitoring or other technical data to support its hypothetical inference that the Allen Wetlands, the Allen Pond and the De Grandis Ponds will not be adversely impacted by quarry drawdown interference.

The presence of higher static water levels (higher hydraulic heads) in deeper M15-3 and M15-2 compared to shallow M15-4 indicates that recharge in M15-3 and M15-2 aquifers is more distant from the quarry or alternatively from the Tributary 'B' stream recharge corridor. Quarry drawdowns will propagate rapidly through these deeper higher conductivity confined aquifers to upgradient areas (see also Township Peer Review Consultant comments November 12, 2013).

5.3.1 Allen Wetlands

The Applicant has no bedrock groundwater levels in the northeast of the proposed Quarry footprint adjacent to or within the Allen wetlands. Nearby monitor well M3 data is 'suspect' based on the absence of seasonal water level variations. Monitor Wells TP8 and TP9 may or may not be 'perched' overburden water tables. More likely, the overburden and bedrock water levels are nearly coincident similar to M13S and 13D in the northwest corner of the quarry and significant drawdowns (up to 7 m) will occur in the TP8 area (Fig 3.2) compared to the Applicant's prediction of 2.45 m on the north quarry edge.

5.3.2 Allen Springs and Farm Pond

The Allen Springs are the source of Tributary A to the north of the Quarry and sustain the downstream Allen farmstead ponds. The Applicant has predicted 80 cm of bedrock aquifer drawdown at Allen Springs for its Scenario 1 (Fig 2.3A and 2.3B).



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However, after application of a factor of safety of 2 the drawdown maybe as much as 1.6 m.

The Applicant has postulated that the Allen Springs are overburden springs and separated from the bedrock aquifers by an aquitard. However, the Applicant has not provided any technical proof.

5.3.3 De Grandis Farm Ponds (W31)

The De Grandis Ponds north of TP8 are reported to be excavated to a shallow bedrock platform (pers comm S. De Grandis 2014) which limited the depth of pond excavation. No boulders are apparent in the excavated spoil disposal areas around the pond. Springs are obvious within the pond and the ponds do not entirely freeze over even in the coldest winter (see Photos A to F enclosed). Tributary B surface catchment area is much less than Tributary C to the east, however the downstream surface flows are similar. The April 8, 2014 water chemistry in Tributary 'B' reflects bedrock groundwater discharges (Hardness 320 mg/L at SW4) whereas Tributary 'C' water is softer (Hardness 210 mg/L at SW11) reflecting surface runoff (Table A).

5.3.4 Brydson Springs

The Brydson Creek and Springs are a groundwater 'resurgence area' for upgradient Tributary B and C recharge and for a portion of the shallower groundwater flow through the proposed Hidden Quarry site. Elevated sodium and chlorides in the Brydson Springs indicate road salt influences from Highway 7 confirming a shallow groundwater flow system.

The Applicant has consistently advised that the Brydson 'Springs' flow will be increased due to the higher post extraction water levels predicted in the quarry lakes at indicator monitor M4. For the condition of increased flow at the Springs and considering that evaporation losses from the quarry lakes will be greater than from the existing dry forest evapo-transpiration rates on the undisturbed quarry site, the only source of this new water gain is increased recharge from Tributary 'B' through the proposed Hidden Quarry site and/or the expansion of the upgradient drawdown catchment to gather more recharge from the north, thereby decreasing upgradient groundwater upwelling spring flows in the Allen and De Grandis Springs and Wetlands (Fig 1.1B).



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5.3.5 Summary

After the application of a 'factor of safety' of 2, to allow for distortions in the Applicant's Model calibration, the drawdown at Allan Springs and at the De Grandis Ponds (and well) is estimated to approach 1 m. These drawdowns may be anticipated to stress flows in Tributary A, B and C and pond water levels at both the De Grandis and Allen Farms and water well levels on the De Grandis Farm.

The Applicant has not proposed any contingency replacement for loss of spring flow to the De Grandis and Allen Ponds and Wetlands.

Brydson Creek dry season flow may also be decreased in the dry season due to excessive wet season passive or active dewatering and shifting of the seasonal recharge water balance to permit spring season quarry operation during Phase 1. The low level adaptive management triggers in s4.1.1 address this issue.

6.0 PROPOSED MONITOR WELL LOCATION DEFICIENCIES AND NEW MONITOR WELLS RECOMMENDED

6.1 New Groundwater Monitoring Wells

The Applicant has nearly two decades of groundwater monitoring data at M1S, M1D, M2 and M4 in the proposed Hidden Quarry Phase 1 and 3 Areas. This long term record was further supplemented in 2012 and in 2014 with the installation of monitoring of four separate aquifer depth intervals at M15. However, the M15 Monitor cluster for unknown reasons was located within the Phase 1 proposed extraction area and will be destroyed as Phase 1 is extracted. Monitor M4 will be compromised by the proposed upgradient washwater Silt Pond and / or recharge sump location, M3 is a suspect monitor, M1D screen is too shallow and W1 has anomalous water quality compared to any other monitored well (Table A).

The Applicant's Fig C1 (November 2014) in December 9, 2014 correspondence includes new monitoring well locations added as a result of Region of Halton and Township of Guelph / Eramosa Peer Review Comments (also Fig 2.1). Multi-level monitors are proposed screened in the M15-4, M15-3 and M15-2 equivalent aquifers - except as noted.

Multi-level M16 - South of Phase 2 Bedrock Extraction Limit



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Open Hole (to 327 m asl)	M17	-	North of Phase 1 Bedrock Extraction Limit, near M2 (may be redundant)
Multi-level	M18	-	West of M4 on the new Highway 7
Multi-level	M19	-	South of the Applicant House Well (W1) near the Tributary 'B' corridor and near Highway 7

In addition, the following additional monitor wells are proposed by this Peer Review (Fig 2.1):

Multi-level	M20 -	at TP8 adjacent to Allen Wetland
Multi-level	M21 -	Tributary 'B' corridor to replace M3 and M15
Multi-level	M22 -	in the vicinity of the De Grandis Ponds and Springs
Multi-level	M23* -	in the vicinity of Allen Springs
Open Hole (to 327 m asl)	M24* -	Replacement of monitor well M1D
Open Hole (to 340 m asl)	M25* -	Upgradient of Brydson Creek headwater pond

* Note: Sentry wells subject to owner permission.

The M2 water levels have been shown to correlate with water levels for M15-3 and M15-2 aquifer zones (Fig 3.1). Therefore, the proposed open hole M17 to quarry depth would appear to be redundant.

There is still no bedrock monitoring well at the northeasterly limit of Phase 2 near TP8 adjacent to the Allen Wetland. With the exception of TP9, there are no boreholes at all in the Phase 2 (East Pond) area to support the Applicant's Site Plan assumed base of overburden and top of bedrock. New multi-level Monitor Well M20 near existing TP8 and M21 is proposed to replace suspect M3 and MW15 scheduled for destruction during Phase 1 extraction. Multi-level wells M16, M19, M20 and M21 are required now prior to Site Plan Approval to confirm the proposed Phase 2 Site Plan top of bedrock and bedrock water level assumptions and properly calibrate the groundwater model.



Suspect monitor M3 should be replaced with multi-level wells similar to M15. At least two years of undisturbed data overlap is required between M15 and M21. All new onsite monitor wells should be located in protected areas outside the proposed pit and quarry extraction and disturbed (berm) setback limits.

Prior to the initiation of the Phase 1 extraction, sentry multi-level monitor wells M22 and M23 are also required, in the vicinity of the Allen Spring and the De Grandis Ponds and about 500 m upgradient of the proposed Hidden Quarry. There is no groundwater monitoring data in this water level sensitive area.

South of the proposed Hidden Quarry monitoring of the upper bedrock water level elevations upgradient of the Brydson Creek headwater pond is proposed at a new sentry monitor M25 subject to owner permission. No off-site downgradient sentry monitor wells are proposed additional to the quarry site perimeter wells at M4, M18 and M19 and Brydson headwater M25 sentry well described above. M25 will provide an elevation analogue for Brydson Creek base flows. Dry season headwater pond levels (geodetic) are also initially required for comparison.

Long term (two decades) shallow bedrock monitoring well M4 will be compromised by the Applicant March 19, 2015 Site Plan Proposal to establish washwater silt ponds immediately upgradient with associated watertable recharge mounding. This monitor well function will be replaced by new multi-level monitors M18 and M19. At least 12 months of overlapping monitoring data is required prior to pit excavation and disturbance.

Monthly manual observation of static water levels should be adequate with bi-weekly monitoring during the months of August, September and October

7.0 CONCLUSIONS

This Peer Review in addition to hydrogeology issues addresses Site Plan deficiencies, inconsistencies and contradictions. Site Plans are the enforceable regulatory instruments governing the future operation of the proposed quarry. The Site Plans and referenced supporting documents must be clear and unambiguous. This is not presently the case.

7.1 Site Plan / Technical Document Synchronization

• The Applicant's Noise, Blasting, and Groundwater Studies and Site Plans have not been synchronized with respect to depths of extraction, direction of extraction, operating floor



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elevations and height of berms. Each study component and recommendations have been independently prepared and internally optimized (siloes) without sufficient regard for the other technical component studies (Fig 1.2 to 1.8).

- Intercell rock wall stability between Phase 1 and Phase 2 (Fig 1.7), and the northwest wetland hydraulic barrier liquefaction concerns as identified by William Hill Mining Consultants Limited (January 31, 2015) have not been addressed.
- The Applicant has not considered the Noise impact of rock haul trucks operating on the inclined ramps and haul road crossing of Tributary B required to support extraction in Phase 2 area (Fig 1.7). The Noise source height at the top of the incline will be nearly equivalent to the specified berm heights.
- In addition to its noise calculations for receptor R3 (W5 as shown on Fig 1.5), the Applicant should also provide similar calculations for nearby homes at R12 (W10) and R16 (W19).

7.2 **Processing Area and Phase 1 Dolostone Extraction**

- The Applicant has elected to initiate Phase 1 dolostone subaqueous extraction in the upgradient high water table area on the north side the quarry (Fig 2.2). The Site Plans specify the operational staging pit floor at the approximate top of bedrock at 349 m asl elevation (Fig 1.6).
- The Noise impact analysis is also based on the processing plant and access haul roads established at 349 m asl elevation (Fig 1.5).
- Initiation of granular overburden extraction to the recommended and specified pit floor (top of bedrock) at 349 m asl in the Phase 1 and 3 areas (Fig 1.6 and 1.8) will induce immediate passive dewatering and drawdowns (lowering the water table).
- To operate on the pit floor (top of bedrock) under dry conditions, water tables will have to be lowered to about 348 m asl throughout the Phase 1 and 3 areas.
- The Site Plan notes assume that water will be able to percolate from the quarry floor to the underlying water table (s3.2.1.2).
- Based on the Applicant bedrock water level monitoring, the only areas of the proposed pit floor where infiltration (percolation) can occur in Phase 1 and Phase 3 areas is in a limited area of quarry floor north of M4 (Fig 1.6).



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- All other pit floor / top of bedrock areas will be underwater especially in the spring of the year and will prevent early season start-up of operations (Fig 2.2).
- Even at M4 water levels in the spring may approach or even exceed 348 m asl (s3.2.1.1). Wet season water levels at W10 to the southeast of the proposed quarry are estimated at about 350 m asl (s3.2.2). The Applicant did not observe four season water levels in the W1 or W10 area so wet season water levels are unknown.
- The area north of M4 is the logical location for a quarry floor recharge sump (Fig 1.6). The Applicant has further complicated usage of the area north of M4 as a quarry sump through establishing his wash and silt ponds in this area.
- Notwithstanding the Applicant Hydrogeologist's frequent statements that drawdowns will be gradually established, the Applicant's Operational Site Plan imposes maximum water table drawdowns in the north and west area of the quarry during overburden and weathered surface rock extraction prior to even initiating Phase 1 dolostone extraction (Fig 3.1).

7.3 Distorted Bedrock Water Level Contours

- The bedrock water level contours as presented in the Applicant's Fig 3.7 September 2012 Hydrogeology Report are based on mixed wet and dry season contours (Fig 2.2). The Bedrock Water Level Contours are unduly influenced by the selected November 11, 2011 dry season static water levels at W1 (346.05 m asl) and at downgradient W16 (345.67 m asl) near Tributary B at Highway 7. M3 to the north is a suspect monitor.
- The Applicant bedrock water level contours are, at best, extrapolated and improvised in the proposed Phase 2 quarry area (Fig 2.2) where it has no confirmed bedrock water level data.

7.4 Post Extraction Ground Water Modelling Drawdown Predictions

- The Applicant's groundwater model calibration has been influenced by these improvised distorted bedrock water level contours (s2.2.1). The Applicant has refused to provide us with its calibration data input to its groundwater model for audit.
- The Applicant's groundwater modelling in the proposed Phase 2 extraction area is unsupported by bedrock groundwater level monitoring (s2.2.2). The modelling calibration is therefore suspect.



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- The Applicant advised in response to the Hunter August 5, 2014 'Query No. 88' that maximum water level decline is 2.45 m at the northern edge of the proposed quarry with a rise of 2.81 m at the southern edge. The March 19, 2015 Site Plans specify the final west pond level at 348.6 m asl and the east pond at 348.4 m asl. These levels are suspect due to the suspect groundwater modelling calibration.
- Furthermore, these drawdown predictions are based on the Applicant's post extraction groundwater model and do not consider the initial operational extraction conditions in Phase 1 and 3 (Fig 1.6 and Fig 3.1).
- These groundwater model derived final post extraction pond levels and drawdowns are presented as precise numbers. It is inconceivable that these pond levels do not have seasonal and estimate variability.
- The Applicant has also predicted that there will be a maximum water level change (drawdown) of 1.6 m at the nearest private well (Burnside, October 6, 2014 letter, pg 1 and 11, Sec 8.1).
- Based on the Applicant's actual monitoring and specified pit operational floor, the required operational seasonal drawdowns vary from 2 to more than 5 m on the westerly, northerly and easterly boundaries of the proposed quarry (Fig 3.1, 3.2 and 3.3). These operational drawdowns are significantly greater than the post extraction drawdowns of 2.45 m predicted by the Applicant.
- Review of the Applicant's operation pit floor / top of bedrock assumptions together with the Applicant's groundwater monitoring data indicates that these operational drawdowns are underestimated by a factor of 2x or more, especially in the northwest (M13D) and northeast (TP8) corners of the proposed quarry.
- For the above reasons and for purposes of this Peer Review, I have applied an expedient 2x factor of safety to the predicted drawdown estimates outside the proposed quarry site.
- The Applicant's suspect groundwater model needs to be re-run and re-calibrated to both local wet and dry season water levels based on a more inclusive bedrock water level monitoring network in the Phase 2 area of the proposed quarry.
- The Applicant's water well ground elevation also need to be adjusted to GRCA (2011) contour elevation data in support of the model calibration.



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It is critical that the bedrock water level contours are accurately modelled as errors in these estimates may have significant impacts on the Applicant's predictions of operational and final quarry lake levels and impacts on nearby domestic water wells, springs and wetlands.

7.5 Requirement for Phase 1 Dewatering Not Addressed

- Perhaps most significant, the Applicant has not considered how the Phase 1 area will be dewatered and water tables lowered below the Phase 1 and Processing Area Site Plan operational floor as specified at 349 m asl on the Site Plans and in its Blasting and Noise Reports (Fig 2.2 and Fig 3.1). Water levels will need to be lowered to about 348 m asl in late April to permit top of bedrock dry staging for drilling, blasting and excavation operations.
- Lowering water tables in the Phase 1 areas will require passive dewatering through drainage to surface recharge sumps at the M4 Phase 3 area and/or alternatively pumping to Tributary B with discharge on the waxing and waning spring flood contrary to the March 19, 2015 Site Plan notes.
- In some years water table levels at M4 are at 348 m asl early in the operational season, passive dewatering to support operations will not be possible (Fig 3.1 and 4.1).

7.6 Compliance Permits to Take Water and to Discharge Effluent Required

- Increased spring seasonal recharge in M4 area by passive dewatering (No MOECC Compliance Permit to Take Water and Discharge Effluent required) may reduce water available for dry season recharge and base flow maintenance in Brydson Creek. Direct pumping to Tributary B (MOECC Compliance Permit to Take Water and Discharge Effluent required) to lower water tables to permit spring operation in Phase 1 area will also reduce water available for subsequent dry season base flow maintenance in Brydson Creek.
- Pit floor recharge in the M4 Phase 3 area is further complicated by the Applicant location of Operational Wash and Silt Ponds in the M4 area (Fig 1.8).
- The Applicant, based on its proposed Site Plan Design, will find it necessary to obtain MOECC Compliance Permits to Take Water for Dewatering and for Discharge of Effluent to Tributary B and Brydson Creek in contradiction to the proposed Site Plan notes and to various undertakings to the agencies.



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7.7 Phase 2 Area Investigations and Monitoring Deficiencies

- The Applicant has a deficiency of base of overburden / top of bedrock observations, no bedrock groundwater level monitoring and limited overburden water level monitoring in Phase 2 area. There is no technical support for the top of bedrock dry operating pit and quarry floor at 354 m asl as specified on the Site Plan (Fig 1.7).
- For my analysis I have assumed the Pit floor in the Phase 2 area at a more realistic 351 m asl. A lower operating dry staging platform offers greater acoustic protection for neighbours (Fig 3.2).

7.8 Additional New Monitor Wells

- Sec 6.1 of this Review contains a summary of new multi-level and open hole Site and Sentry Monitor Wells recommended. A number of these wells are required to define the Phase 2 Site Plan operational parameters prior to Township Zoning and Aggregate Licence Approval (Fig 2.1). Others are required to replace existing non-functional wells and wells which will be destroyed by extraction.
- All new monitor wells (Fig 2.1) must be installed and monitored for a minimum of four seasons prior to initiation of overburden extraction and passive or active water table lowering.

7.9 Unsuitability of Guelph Limestone Quarry as a Valid Analogue for Hidden Quarry

- The Applicant's estimated groundwater inflow at the proposed Hidden Quarry is only about 10% of the pumped groundwater discharge rate at Guelph Limestone quarry at the time of the Applicant's wet season water quality sampling (s2.5). Therefore the water quality dilution factor is much higher (10x) at Guelph Limestone Quarry.
- The Applicant's use of a volumetric comparison for water quality dilution and the use of the Guelph Limestone Quarry as a direct analogue without adjustment of water quality sample results is not valid. Furthermore, the Applicant's water quality sampling is seasonally biased towards optimal results (s2.5).



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7.10 Adaptive Management Triggers

- S4.0 of this report contains a detailed review of desirable Adaptive Management Trigger including Early Warning (Amber Alert) and Stop Work (Red Alert).
- Amber Alerts provide early warning that operational parameters are trending outside of a reasonable range and an immediate Applicant response is required. Red Alert indicates that stoppage of quarry extraction operations is necessary until the issue is corrected through mitigation or alternatively until the Quarry operator proves other factors are primary determinants.
- Monitoring will be increased to weekly when Amber Alerts are in effect. Red Alerts are a signal for immediate stop work action, not just for increased monitoring as often contemplated by the Applicant (December 9, 2014).
- Amber and Red Alerts will be reported immediately to the agencies, to the affected citizens and to the Concerned Residence Coalition.

7.10.1 Water Levels

- Additional New or revised Amber and Red Alerts have been proposed as appropriate for water levels (s4.1). Wherever there is adequate water level monitoring, Alerts have been constructed as a seasonal hydrograph to provide advance warning of impending low or high water levels.
- It has not been possible to set water level Amber and Red Alerts in the proposed Phase 2 quarry area due to the absence of baseline water level monitoring data.

7.10.2 Water Quality

- Yellow and Red Amber Alerts have been recommended for selected Provincial Water Quality Objectives (1999), Ontario Drinking Water Standards (2006) and on ambient local conditions in s4.2 of this report.
- I do not agree with the Applicant's assumption that it can monopolize the full residual Reasonable Use of the proposed Hidden Quarry aquifers, i.e. the ODWS (2006) or above the 95th Percentile (January 14, 2014 Applicant Letter pg 16). There may be



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other adverse upgradient water quality trends and downgradient home owner site conditions that adversely affect the local source drinking water aquifer environment.

- Based on the Applicant's water quality sampling history, the Amber Alert value for Nitrate-N on the downgradient side of the quarry is recommended at 3.5 mg/L and Red Alert at 5 mg/L (s4.2.11).
- Total Dissolved Solids (TDS) is a measure of the palatability of drinking water. Based on the Applicant's water sampling program, the TDS Amber Alert is recommended at 450 mg/L and Red Alert 475 mg/L (s4.2.5).
- Turbidity Amber Alerts are recommended at 3.0 NTU and Red Alerts at 4.0 NTU (s4.2.6).
- Official Plan General Policies for Wellhead Protection often include a 100 m pathogen protective zone around each wellhead. The Applicant should exercise appropriate cautions in this zone.
- Microbiological parameters E. Coli and Total Coliform should be non-detectable at monitoring wells (s4.2.14).
- Alerts for other significant Water Quality parameters are included in Sec 4.2 of this Peer Review.

7.11 Replacement of Private Wells and Springs due to Quarry Interference

• I do not agree with the Applicant's statement in its January 8, 2015 Memorandum:

'However there is no indication that any private well is susceptible to loss / reduction of water supply as a result of the quarry development.'

- s5.0 of this Review provides a summary of the nine (9) private well replacements (4 upgradient and 5 downgradient) recommended due to potential quarry water level and quality interference. These new wells should be screened in the M15-2 equivalent aquifer zone. Well construction is to be compliant with O.Reg 903 standards.
- There may also be other wells not adequately surveyed as to pumping levels and/or dug wells beyond the Applicant's arbitrary 500 m distance where groundwater interference may occur.



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- After the application of a 'factor of safety' of 2, to allow for distortions in the Applicant's Model calibration, the drawdown at Allan Springs and at the De Grandis Ponds (and dug well) is estimated to approach 1 m. These drawdowns may be anticipated to adversely stress flows in Tributary A and B, Allen Wetland water levels, pond water levels at both the De Grandis and Allen Farms and water well levels on the De Grandis Farm.
- A dry season drawdown of only 40 cm in the De Grandis dug well will result in a dry well (s5.1.3).
- The impact of site dewatering on the Brydson Creek and the Allen wetlands has not been addressed by the Applicant Site Plans.
- The Applicant has not proposed any contingency measures for loss of spring flow to the De Grandis and Allen Ponds and Wetlands and loss of well water for watering of the De Grandis 80 cow and calf herd and other livestock.

7.12 Brook Trout Spawning

Active Brook Trout spawning beds were identified by Dr. Karl Schiefer during an aquatic ecosystem and fish survey of the Brydson Creek. The Creek headwater is located within 225 m of the licence boundary, 350 m of the overburden extraction limits and 425 m of the Site Plan bedrock extraction limits.

'.....spawning beds within a 300 m radius surrounding the site may be subjected to vibrations in excess of the DFO limit of 13 mm/s. In the event that active spawning beds are identified within 400 m of any planned quarry blast, vibration monitoring will be required at the shoreline adjacent to the spring area, or closer to the blast, in order to ensure compliance with DFO limits for ground vibration.' (from the September 5, 2014 Blast Impact Analysis Update Report)

Potential extraction within the receptor R16 165 m setback limits as permitted in the March 19, 2015 Site Plans, will encroach on the 400 m quarry blast buffer distance and require ground vibration monitoring adjacent to Brydson Creek headwater. Extraction within 165 m of Receptors should not be permitted without a Site Plan Amendment (s1.5). The Site Plans should be amended to this effect.

8.0 **RECOMMENDATIONS**

I have concluded and recommend that the corresponding Township of Guelph / Eramosa Zoning By-law Amendment and the Ministry of Natural Resources and Forestry Aggregate



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Resources Act Site Plans should not be approved until the Applicant resolves the outstanding conflicts between the component technical studies and Site Plans, installs additional perimeter monitoring in the proposed Phase 2 quarry area, observes four season water levels in these monitors, updates the Groundwater Model predictions, updates the wetland ecological assessments to conform to the updated hydrogeological work, and updates the deficient March 19, 2015 Site Plan versions.

The independent Applicant Blasting, Noise, Groundwater and Ecological component reports need to be harmonized with and support the ultimate regulatory Site Plan Instrument. The Applicant must resolve how dewatering will be accomplished to lower the operational water tables in the Phase 1 area to support the proposed Site Plan Operational Plan without active dewatering. The Site Plans must capture the Applicant commitments in the document stack.

All of the above information is required to complete the Site Plans as a clear, efficient, enforceable regulatory instrument with coordinated supportive technical documentation.

Yours truly,

1 Alt

Garry T. Hunter, M.A.Sc., P.Eng. President Hunter and Associates

cc: S. De Grandis Concerned Residents Coalition (CRC)

Enclosures:

- Table A Annotation
- Table A (3 pages): Water Quality at Proposed Quarry Site and Existing Guelph Limestone Quarry
- Site Photos A to H
- Bibliography
- Figure Annotations
- Figures:
 - 1.1A Various Buffer Distances
 - 1.1B Applicant's Fig 8, Watersheds of Tributaries B and C
 - 1.2 Applicant Blast Impact Analysis



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- 1.3 Applicant Noise Impact Study
- 1.4A&B Applicant Noise Berm Elevations
- 1.5 Applicant R3 Noise Sample Calculation Locations
- 1.6 Applicant Site Plan Phase 1
- 1.7 Applicant Site Plan Phase 2
- 1.8 Applicant Site Plan Phase 3
- 2.1 Monitoring Locations
- 2.2 Applicant's Fig 3.17, Mixed Wet and Dry Season Bedrock Water Level Contours
- 2.3A&B Applicant Maximum Predicted Water Level and MOE Water Well Static Levels
- 2.4 A&B Applicant Post Extraction Bedrock Groundwater Level Contours, with Reverse Particle Tracking and MOE Water Well Static Levels
- 2.5 Guelph Limestone Quarry Water Discharge from Sump 3, 4, 5, 2001 to Jan 2014
- 3.1 Phase 1 and Processing Plant Area Monitoring Station Hydrographs, May to Oct 2014
- 3.2 Phase 2 Area Monitoring Station Hydrographs, May to Oct 2014
- 3.3 Phase 3 Area Monitoring Station Hydrographs, May to Oct 2014
- 4.1 Adaptive Management Trigger Levels, M4 Hydrographs 2007, 2008 and 2014
- 4.2 Adaptive Management Trigger Levels, M2 Hydrographs 2007, 2008 and 2014
- 4.3 Adaptive Management Trigger Levels, M13S/D and SW6 Hydrographs 2011 and 2014
- 4.4 Adaptive Management Trigger Levels, M1-D Hydrographs 2007, 2008 and 2014



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TABLE A and Annotations:Water Quality at Proposed Hidden Quarry Siteand Existing Guelph Limestone Quarry

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Proposed Hidden Quarry Hunter Peer Review

Table A Annotations

Table A provides a summary of Key Water Quality parameters as contained in the Applicant's documents. The Table is divided into:

- A. Groundwater Monitors within the proposed Hidden Quarry site.
- B. Private Wells
- C. Guelph Historic Quarry Pond
- D. Surface Water

Not all the November 14, 2014 private well water quality survey data was made available for this peer review. However, the data included in Table A appears to be representative of ambient site conditions.

The water quality in Table A is compared to Provincial Water Quality Objectives (1999), Ontario Drinking Water Standards (2006) and to local ambient values (Hardness). Exceedances are shown with grey shading. Bold values are considered key comparative water quality parameters.

The Guelph Limestone Quarry sampling was undertaken in late winter (February 15) and early spring (April 28) when groundwater discharge was about 10,000 m^3 /day (10x) compared to the Applicant's estimated groundwater throughflow at the proposed Hidden Quarry at 1,000 m^3 /day (10%). Therefore, parameters at Guelph Limestone Quarries are significantly diluted and are not valid for direct comparison to Hidden Quarry. Dry season water quality sampling (August / September) would have indicated higher water quality parameter concentrations at the Guelph Limestone Quarry.

Table AWater Quality at Proposed Hidden Quarry Site
and Existing Guelph Limestone Quarry

Sample Location	Date	Sodium	Hardness (CaCO ₃)	TDS	Zinc	Iron	Manganese	Un-ionized Ammonia	NH3-N	NO2-N	NO3-N	TKN	Total Nitrogen	Calculated Organic Nitrogen	Total Organic Nitrogen	Dissolved Organic Carbon
Criteria				(1	mg/L)	(mg/L)	(mg/L)		(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)
PWQO (1999) ODWS (2006) Local		20	400		0.03	0.3	0.05			1.0	10.0			0.15	0.15	(IIIg/L) 5.0
A. Groundwater Mo	onitors (On Site)															
M15-4	Nov 11, 2014	7.7	390	430	0.059	ND	ND	2	ND	ND	2.25	0.14	2.4	0.14		1.2
M15-3	Nov 11, 2014	5.3	360	410	0.036	ND	ND	-	ND	ND	2.33	0.25	2.6	0.14	-	1.2
M15-2	Nov 11, 2014	8.9	390	450	0.047	ND	0.0045	-	ND	ND	1.99	0.23	2.0	0.24	-	1.1
M15-1	Nov 11, 2014	8.8	410	470	0.043	ND	ND	-	ND	ND	2.01	0.15	2.2	0.15	-	1.2
M4	Nov 11, 2014	8.3	390	450	0.048	ND	ND	-	ND	ND	2.48	0.18	2.7	0.18	-	1.1
M3	Nov 11, 2014	8.5	340	360	0.038	ND	ND	-	0.16	ND	1.12	0.26	1.5	0.1	-	0.98
M2	Nov 11, 2014	7.1	350	400	0.043	ND	ND	-	0.079	ND	3.99	0.26	4.3		-	1.3
M13D	Nov 11, 2014	14	350	400	0.098	ND	ND	_	0.082	ND	3.55	ND	3.6	0.16	-	1.4
M1D	Nov 11, 2014	24	510	610	0.65	ND	0.058	_	0.064	ND	ND	0.37	0.4	0.31	-	1.2
W1	Nov 3, 2014	5.3	\$10	600	0.018	0.99	0.033	-	ND	ND	ND	ND	10 A	0.0	-	2.9
M15-4	May 5, 2014	5.4	340	370	0 034	ND	ND	_	ND	ND	1.96	0.19	2.15	0.0	-	0.61
M15-3	May 5, 2014	2.3	340	450 (0.017	ND	0.0080	-	ND	ND	3.17	0.9	4.07	0.9	-	0.85
M15-2	May 5, 2014	8.3	370	440	0 040	ND	0.0024	-	ND	ND	2.19	0.28	2.47	0.28	-	2.1 0.85
M15-1	May 5, 2014	8.0	390	470 (0.028	ND	ND	-	ND	ND	1.62	0.22	1.84	0,22	-	0.83
М3	Nov 20, 2013	-	~	-	-		-	-	ND	ND	5.2	0.77	5.97	0.77	_	0.83
M2	Nov 20, 2013	-	14	-	~	÷	-	-	ND	ND	4.6	1.3	5.9	- 13	-	
M13D	Nov 20, 2013	-	-	-	-	-	-	-	ND	ND	0.9	0.38	1.28		-	-
M15	May 24, 2013	6.9	390	439	3.062	ND	0.0022	-	0.060	ND	2.0	0.20	2.3	0.14	-	1.0

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Our File No.: 14-401

														Our Pile No 14-4		+01
Sample Location	Date	Sodium	Hardness (CaCO ₃)	TDS	Zinc	Iron	Manganese	Un-ionized Ammonia	NH3-N	NO2-N	NO3-N	TKN	Total Nitrogen	Calculated Organic Nitrogen	Total Organic Nitrogen	Dissolved Organic Carbon
Criteria					(mg/L)	(mg/L)	(mg/L)		(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)
PWQO (1999) ODWS (2006)		20			0.03		0.07								((IIIG/13)
Local		20	400			0.3	0.05			1.0	10.0			0.15	0.15	5.0
W1	May 18, 2012	5.9	500	613	0.020	0.14	0.02	_	ND	ND	0.13		0.13+			
M2	Nov 21, 1996	8.0	-	•	023	0.68	0.05	-	_	ND	6.8			-	5	
M3	Nov 21, 1996	6.4	-	-	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	A at the desired	ND		_	ND		-	6.8 +	-	-	-
M4	Nov 21, 1996	6.6			0.14	0.14	0.01	-			5.3	-	5.3 +	<u> </u>	ŝ	9 5 1
M5	Nov 21, 1996				and the second second			-	-	ND	2.8	-	2.8 +	-	2	÷
		50	-		2.9	2.1	0.11	-	12	ND	1.6	-	1.6 +	-	2	-
TP1	Nov 21, 1996	18	-	-	0.36	0,43	0.81	-	-	ND	0.94	-	0.94 +	-	-	(2)
M1	Nov 21, 1996	5.6	-	-	0.07	0.22	0.03	a	-	ND	0.71	-	0.71 +	-	-	-
B. Private Wells																
W31	Dec 12, 2014	9.16	381	444	0 102	< 0.01	< 0.002	2	< 0.02	< 0.05	9.63	<0.10	9.7	0.0		1.2
W5	Nov 5, 2014	9.1	340	380	0.075	ND	ND	-	ND	ND	4.66	0.11	4.8	0.11	-	0.85
W4	Nov 4, 2014	8.8	360	390	0.12	ND	0.0064	-	ND	ND	2.90	ND	2.9	0.0	_	0.85
W16	Nov 3, 2014	67	380 🖄	540	0.034	ND	ND	_	ND	ND	1.44	0.12	1.56			
W19	Nov 3, 2014	9.6	380	420	0.051	ND	ND	2	ND					0.12	-	1.4
W31	May 23, 2012	11	370	420						ND	1.98	ND	2.0	0.0		0.72
	1. nuj 23, 2012	11	570	420	0.26	ND	0.012	-	ND	ND	10.4	-	10.4 +	-	-	1.1
C. Guelph Limestone Quarry Pond	Feb 15, 2012	80	-	- 12	0.057	ND	0.026	0.005	0.39	0.05	1.2	0.7	2.2 Mar.			
S1 Before	Apr 28, 2014		1		S. S. Car		0.020	0.000				0.7	2.3	0.31	-	-
S2 +12 min	Apr 28, 2014			-		-	-	-	ND	ND	0.47	0.31	0.8	0.31	220	-
		-	-	-	120	-	-	-	ND	ND	0.46	0.43	0.9	0.43	-	-
S3 + 78 min	Apr 28, 2014	-	-	-	-	-		-	ND	ND	0.44	0.43	0.9	0,43	-	-
S4 + 903 min	Apr 28, 2014	-	-	-	-		-	•	ND	ND	0.47	0.29	0.8	0.29	-	-

May 8, 2015

Our File No.: 14-401

Sample Location	Date	Sodium	Hardness (CaCO ₃)	TDS	Zinc	Iron	Manganese	Un-ionized Ammonia	NH3-N	NO2-N	NO3-N	TKN	Total Nitrogen	Calculated Organic Nitrogen	Total Organic Nitrogen	Dissolved Organic Carbon
Criteria					(mg/L)	(mg/L)	(mg/L)		(mg/L)	(mg/L)	(mg/L)	(mg/L	(mg/L)	(mg/L)	(mg/L)	(ma/I)
PWQO (1999) ODWS (2006) Local		20	400		0.03	0.3	0.05			1.0	10.0	((0.15	0.15	(mg/L) 5.0
D. Surface Water																
RSI / Trib A	Nov 5, 2014	10.1	350	380	0.028	ND	ND	-	0.058	0.017	6.02	0.17	6.3	0.11	-	2.2
SW4 / Trib B	Nov 5, 2014	8.5	340	350	0.022	ND	0.0041	-	ND	ND	1.05	0.47	1.5	0.47	-	6.5
SW7 / Trib B	Nov 5, 2014	8.3	320	340	0.046	ND	0.0059	-	ND	ND	0.80	0.51	1.3	0,51	_ #	6.9
SW11 / Trib C	Nov 5, 2014	7.0	370	360	0.018	ND	0.0080	-	ND	ND	ND	0.56	0.56	0:56	_	9.2
Brydson Spring	Oct 16, 2014	27.3	350	420	0.035	ND	0.0033	-	0.064	ND	2.39	0.27	2.7	0.21	يد بد	1.3
SW 4 / Trib B	Apr 8, 2014	8.5	320	-	0.032	ND	0.0066	-	ND	ND	4.64	0.54	5.18	0.54	0.5	2.3
SW8 / Trib B	Apr 8, 2014	8.3	300	- 4	0.032	ND	0.0031	2	ND	ND	4.53	0.43	4.96	0.43	04	2.4
SW11 / Trib C	Apr 8, 2014	4.7	210	- 1	0.076	ND	0.018	-	0.076	ND	0.9	0.62	1.6	0.54	0.5	52
SW3	Nov 21, 1996	7.5	-	F	0.03	ND	ND	-		ND	9.0	-	9.0 +	-	-	
Stream (?)	Nov 21, 1996	8.0	141	=	0.05	ND	ND	-	-	ND	8.2	ŝ	8.2 +	-	-	
Brydson Creek	Nov 21, 1996	15	-	-	0.01	0.06	0.02	z.	-	ND	1.8	-	1.8 +		-	
SW1	Nov 21, 1996	11	-	-	0.01	0.06	ND	-	-	ND	ND	-	0.0 +	-	-	

Notes: 1. Calculated Organic Nitrogen = TKN – Ammonia

2. W4, W5, W16, W19 and W31 test results from individual well owners.

3. S1 Before Blast;

S2, S3, S4 Minutes after Blast

4. Mid Point of Sand Pack: M15-4 345.3 m asl M15-3 333.1 m asl

> M15-2 324.3 m asl M15-1 317.8 m asl

Source: Proponent's Appendix E September 2012 Hydrogeological Investigation

Proponent's July 15, 2013 Response Letter to MOE

Proponent's June 10, 2014 Response Letter to Burnside

Proponent Groundwater Quality Testing, Water Quality Results, Nov. 17, 2014

Proponent's Dec 9, 2014 Response Letter to Burnside

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Hidden Quarry Peer Review ANNOTATED SITE PHOTOS: A to H



Photo A

De Grandis IMG_20150107_151654 (Jan.7, 2015) Photo B

De Grandis IMG_20150120_134324_hdr (Jan.20, 2015)

Photo A and B: De Grandis Brydson Creek Tributary B headwater groundwater fed pond with abundant waterfowl, on Jan. 7 and Jan 20, 2015 (Photos by S. De Grandis).

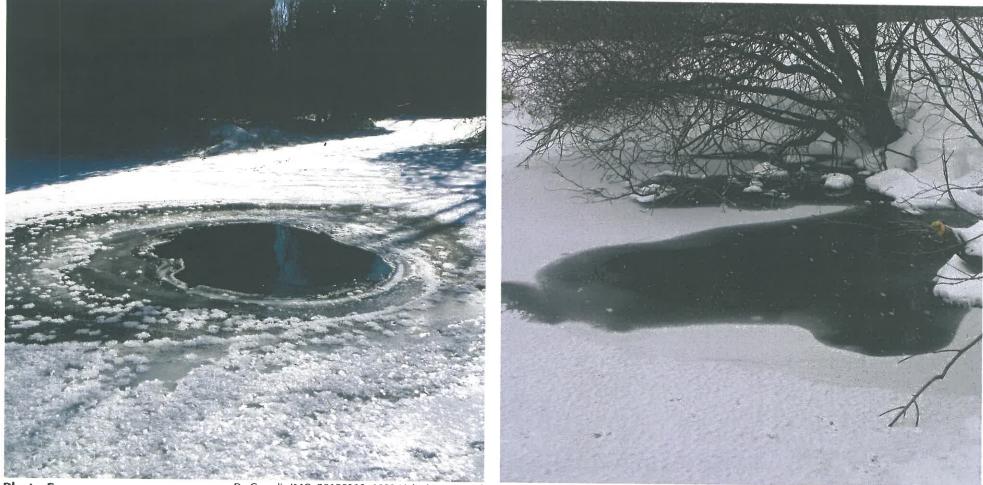


Photo C

De Grandis IMG_20150221_123005 (Feb. 21, 2015) Photo D

De Grandis IMG_20150221_122921 (Feb. 21, 2015)

Photo C and D: De Grandis Tributary B groundwater fed pond with open water over emergent spring areas on Feb.21, 2015 after very cold winter weather without thaws. Low 'dry season' water levels (Photos by S. De Grandis).





De Grandis IMG_20150228_103248 (Feb. 28, 2015) Photo F

De Grandis IMG_20150303_101933 (Mar.3, 2015)

Photo E and F: De Grandis Tributary B headwater pond after the severe cold month of February 2015 without thaws ('dry season' low flow conditions). Frozen water vapours from warm springs forms ringlets around poind. Minimal open water over emergent warm springs on Feb 28 and Mar 3, 2015 (Photos by S. De Grandis).



Photo G

Hunter IMG 5635 (April 11, 2014) Photo H

Hunter IMG 5633 (April 11, 2014)

Photo G and H: Brydson Creek Weirs.

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 Appendix B - Water Level Monitoring Data

Appendix B - Water Level Monitoring Data Appendix C - Surface Water Flow Data Appendix D - Hydraulic Testing Data Appendix E - Water Quality Results Appendix F - MOE Water Well Records Appendix G - Private Well Survey Appendix H - Groundwater Model Appendix I - Historical Aerial Photographs Appendix J - Water Balance Appendix K - Spills Action Plan

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Hidden Quarry Peer Review FIGURES WITH ANNOTATIONS Ms. Kim Wingrove Chief Administrative Officer Township of Guelph/Eramosa May 15, 2015 Page 1 of 5

Proposed Hidden Quarry Hunter Peer Review

Figure Annotations

- Fig 1.1A Various Blasting and other Buffer Zone distances contained in the Applicant documents and Peer Reviews have been superimposed on the Hunter Hidden Quarry base mapping. Domestic well sites included. The spring fed pond at the Brydson Creek headwater is 225 m from the licence limit, 350 m distant from the overburden extraction limit and 425 m from the bedrock extraction limit. Bedrock extraction into the 165 m R16 (W19) receptor setback limit as implied on the Site Plans will reduce the buffer limit from the Brydson Creek headwater.
- Fig 1.1B Fig 1.1B illustrates the Tributary B and C surface catchments (watersheds). Tributary A, B and C are intermittent 'losing' streams above Highway 7. Tributary B despite its smaller catchment dominates flow at Highway 7 suggesting the bedrock catchment substantially exceeds the surface catchment.
- Fig 1.2 Fig 1.2 shows the direction of extraction (excavation) and Blasting Limit lines as recommended by the Applicant Blasting Study. The Site Plan Note contradicts the Blasting Line Limit (165 m) diagram.
- Fig 1.3 Fig 1.3 shows the contradictory directions of extraction (excavation) as recommended by the Applicant Noise Study compared to preceding Fig 1.2.
- Fig 1.4A Fig 1.4A shows the contradictory directions of extraction in the Applicant's Noise Study compared to preceding Fig 1.2 and 1.3. Fig 1.4A appears to be the authority for the Site Plan top of acoustical berm elevations.
- Fig 1.4BFig 1.4B shows the contradictory directions of extraction on the superimposed ApplicantSite Plans vs the Noise and Blasting Studies as shown on Fig 1.2, 1.3 and 1.4A.
- Fig 1.5 Noise reference points and pit floor elevations as utilized by the Applicant to calculate noise impacts at Receptor R3 (W5) have been superimposed on the Hunter Hidden Quarry base mapping. Similar calculations should be provided for nearby receptors R16 (W19) and R12 (W10).

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Fig 1.6The Noise Report recommended establishing the Processing Areas and Internal Haul Roads
at 349 m asl (also Fig 1.5). These 349 m asl pit floor elevations are specified in the Phase
1 area but not on the corresponding internal haul road and processing area locations on the
Applicant Site Plans.

Wash and silt ponds have been located upgradient of M4 and domestic well W19 (R16). This is the only area of the pit floor where a pit floor sump may be located above the existing wet season water table levels (see also Fig 2.2).

The Site Plan Phase 1 directions of extraction (excavation) are at variance with Fig 1.2, 1.3, 1.4.

Fig 1.7The north acoustic berm top elevation at 363 m asl is not inconsistent (error) with Fig 1.4A
and B.

The Phase 2 directions of extraction (excavation) contradict Fig 1.2 and 1.3.

Fig 1.8 The Phase 3 directions of extraction are not consistent with Fig 1.2, 1.3 and 1.4A.

Processing area and haul road operating Pit Floor have not been specified at 349 m asl as recommended by the Applicant Noise Report (see also Fig 1.5).

- Fig 2.1 Fig 2.1 shows the location of recommended new multi-level monitoring wells constructed similar to M15 which will be destroyed by Phase 1 extraction. M16, M19, M20 and M21 to M15-2 aquifer are required to support new groundwater model runs prior to aggregate licence approval. M18, M22, M23, M24 and M25 are required well in advance of on-site passive or active water table disturbance. M17 is an optional replacement for deep long term monitor M2. M24 is required to replace Monitor M1-D as an openhole monitor to the proposed quarry floor elevation. M25 provides for monitoring water levels upgradient of the Brydson Creek headwater. See s6.1 for additional information.
- Fig 2.2 The Applicant has used mixed May 31, 2011 wet season bedrock water levels for the west part of the proposed quarry and dry season levels (Nov 2011) in the southeast part of the quarry.

The Applicant does not have observed four season bedrock groundwater level data in the entire eastern part of the quarry. M3 is a suspect monitor. The Applicant has inferred the

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bedrock water level contours in the northeast part of the quarry. These influences compromise its subsequent groundwater model calibration and drawdown predictions, final quarry lake water level prediction and related ecological impact assessments.

- Fig 2.3A Furthermore, the drawdowns shown on Fig 2.3A are post-extraction not operational drawdowns. The Applicant's groundwater model predictions are 'flawed' by its inferred model calibration data (Fig 2.2). For purposes of this Peer Review, I have applied a factor of safety of 2x to the Applicants predicted drawdowns north of the proposed quarry, therefore a 0.6 m drawdown is assumed at 1.2 m for impact assessment purposes. The contour 'bulls-eyes' or 'pimples' in the proposed quarry area indicate data anomalies or errors. The Applicant has refused to provide Hunter with its modelling groundwater level datasets for audit. The Model needs to be recalibrated and rerun prior to Site Plan approval.
- Fig 2.3B Fig 2.3A is superimposed on Hunter's standard orthophoto base map for the Hidden Quarry site (2.3B). This map shows buffer distances from the proposed quarry licence limit and contains locations of domestic water wells with MOE # and static water levels at the time of well completion. After applying a 2x safety factor, the predicted drawdown at the De Grandis Pond and Springs is about 1 m, at Allen Spring 1.2 m and at W7 about 1.2 m. The drawdown at W5 (Fig 2.3B) is underestimated (see Fig 2.4A and 2.4B).

The above drawdowns are excessive for maintenance of shallow dug wells, wells with shallow pumps, springs and wetlands. The model needs to be recalibrated and rerun.

- Fig 2.4A This Figure shows the Applicant's modelled bedrock water level contours and reverse particle tracks showing the predicted flow origins of water to domestic wells. These are post-extraction, not operational drawdowns. At face value the reverse particle tracks show that domestic wells W10, W16, W17, W18 and W19 are within the direct quarry water quality influence zone.
- Fig 2.4B The Applicant's (modelled) predicted groundwater contours (Fig 2.4A) are superimposed on the standard Hunter Hidden Quarry base map which contains domestic water wells with MOE #'s and static water levels elevations (m asl). It is noted that at W50 (added by Hunter) a known bedrock well at the front of the De Grandis farm, the Applicant's modelled bedrock water levels plot is about 3.5 m below the static water level when drilled and 3.7 m below the static water level at nearby W32 when completed.

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Similarly, the modelled ground water level at the De Grandis dug well is 2.9 m below, the Allen Spring 2.5 m below, W5 about 4 m below, and Brydson Spring 4 m below. The modelled surface at W10 is about 2 m below and at W1 in contrast is similar. This data illustrates that the modelled bedrock groundwater surface is for the most part below the water levels observed at the time of domestic well completion **as referenced to the GRCA 2011 ground elevations**. The model results are again questioned.

- Fig 2.5 The Applicant's water quality sampling events at the Guelph Limestone Quarry occurred when discharge (10,000 m³/day) from the quarry and flow dilution was relatively high at the beginning of the blasting season. Water quality sampling should be undertaken in late summer when quarry groundwater discharge flows are lower and following a continuous period of blasting and extraction history. This water quality sampling is seasonally biassed towards optimal results.
- Fig 3.1 The Applicant relied on its groundwater model to predict post-extraction final water levels. The Applicant did not have regard for the groundwater drawdowns required to actually operate the pit / quarry in accordance with its proposed Site Plans. This figure shows the actual operational drawdowns utilizing the Applicant's supplied May to October 2014 groundwater level monitoring as an analogue. Domestic well locations are shown on Fig 1.1 and the Applicant monitor locations on Fig 2.1. The actual drawdowns for the most part, especially during the spring season, significantly exceed the Applicant's post-extraction model estimates.

Drawdown in shallow monitors may not fully develop due to the presence of aquitards or hydraulic barrier influences. M3 is a suspect monitor as demonstrated by the absence of typical seasonal water level variations.

Fig 3.2 The Applicant does not have any confirmed bedrock groundwater levels in the Phase 2 Operating Area. Using spring seasonal water levels monitored at TP8 adjacent to the Allen Wetland, the maximum drawdown assuming absence of underlying aquitards for May 5, 2014 would be 7.1 m and at TP9 3.9 m compared to the Applicant's predicted Final East Pond Water Level at 348.4 m asl.

Nearby Monitor M3 is a suspect monitor as demonstrated by the absence of the typical seasonal water level variations observed at the other monitors.

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Fig 3.3 Monitor M4 is the only area in the Quarry where the water tables are known to be below the Applicants proposed Phase 1 and 3 pit operational floor in most spring seasons. Operational drawdowns at M1D based on 2014 water levels are about 4.2 m in the spring of the year.

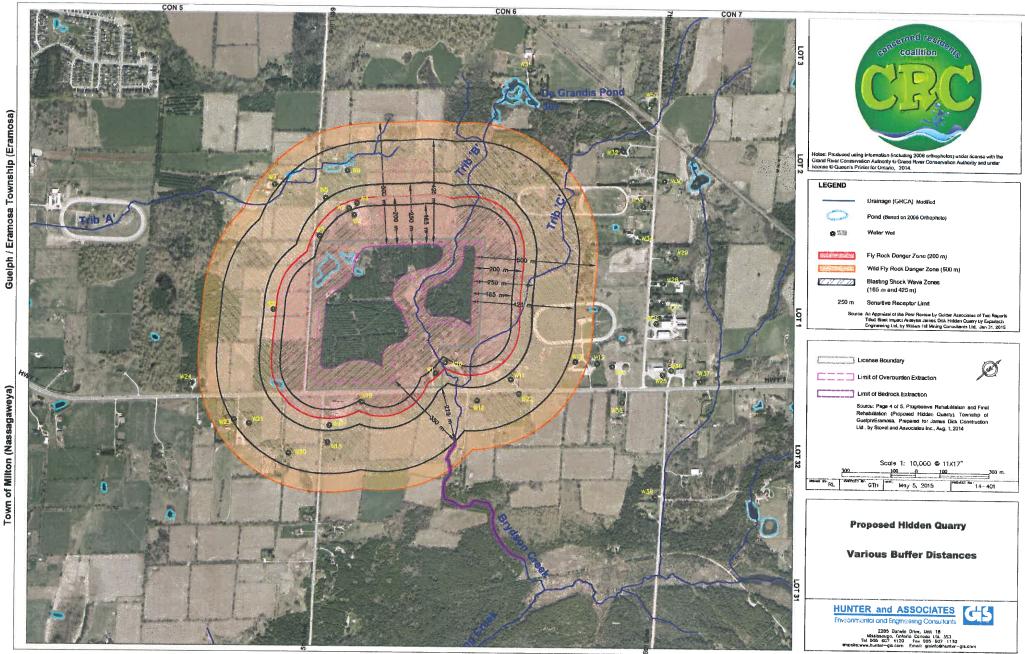
The Applicant has not provided four season monitoring for W1. W10 when completed in July 1974 had an observed static water level of 348.2 m asl indicating spring wet season levels of 350 m asl or greater.

The drawdowns shown for shallow monitors may not fully develop due to the presence of aquitard layers.

Fig 4.1 These hydrographs have been constructed based on 2014 routine static water levels at M4 and selection of the extreme dry years of 2007 and 2008 in the monitoring record for comparison. A geodetic elevation is required for the Brydson Creek headwater pond.

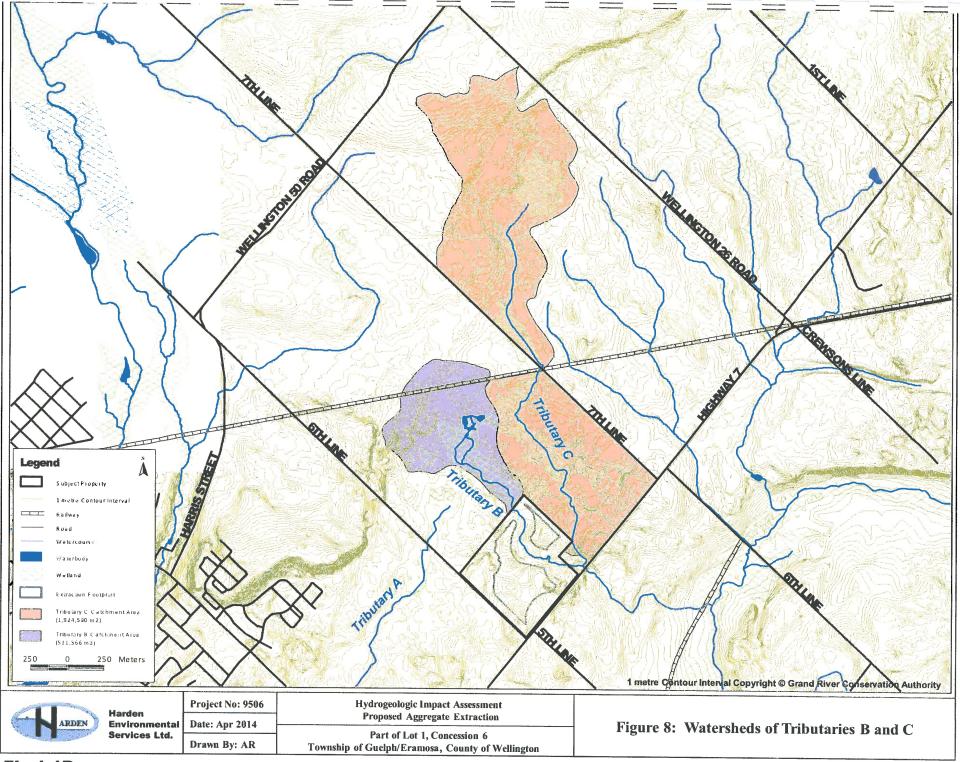
In the event of passive or active dewatering of the pit / quarry floor during the higher water level spring season, excess wet season dewatering may deplete subsequent dry season water levels important for maintenance of Brydson Creek base flows. Therefore, seasonal low level adaptive management Amber and Red Alerts have been recommended. The Applicant has not proposed any Alert levels for M4.

- Fig 4.2 The M2 Adaptive Management Trigger levels are based on the Applicant's Site Plan proposed pit floor and operating water level drawdown requirements. The Amber Alert drawdown level in 2014 decreased from 4.0 m in May to 2.4 m in August.
- Fig 4.3 The Applicant proposed Amber and Red Alerts for Monitor Well 13D are plotted on this hydrograph. These alerts show a 4.1 m drawdown at nearby W5 based on static water levels at the time of W5 completion.
- Fig 4.4 Actual 2014 year seasonal drawdowns to the Applicant predicted (suspect) final west pond water levels are estimated at 4 m in May and at 3.3 m in August for M1D. The bottom of the screen at M1D is at about 348 m asl. This monitor will have to be replaced with a deeper screened base at about 327 m asl to ensure an appropriate operating range is available for Alert monitoring.



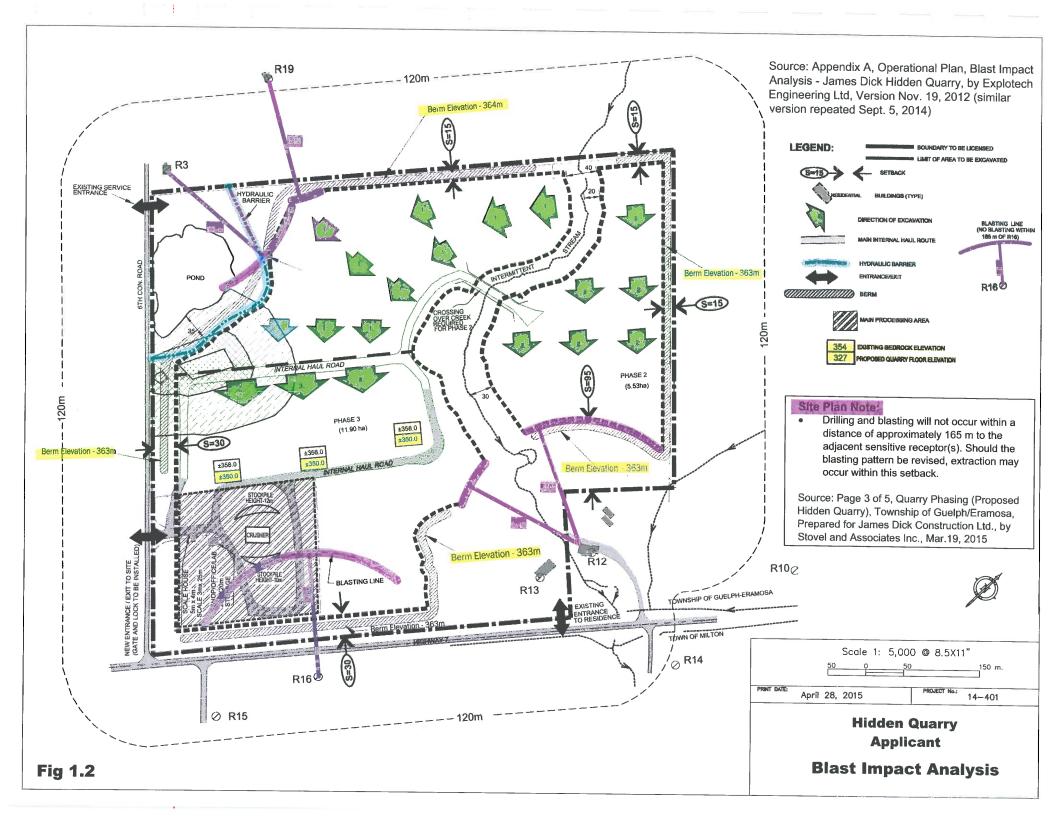
Brydson Creek permanent groundwater upwelling and springs.

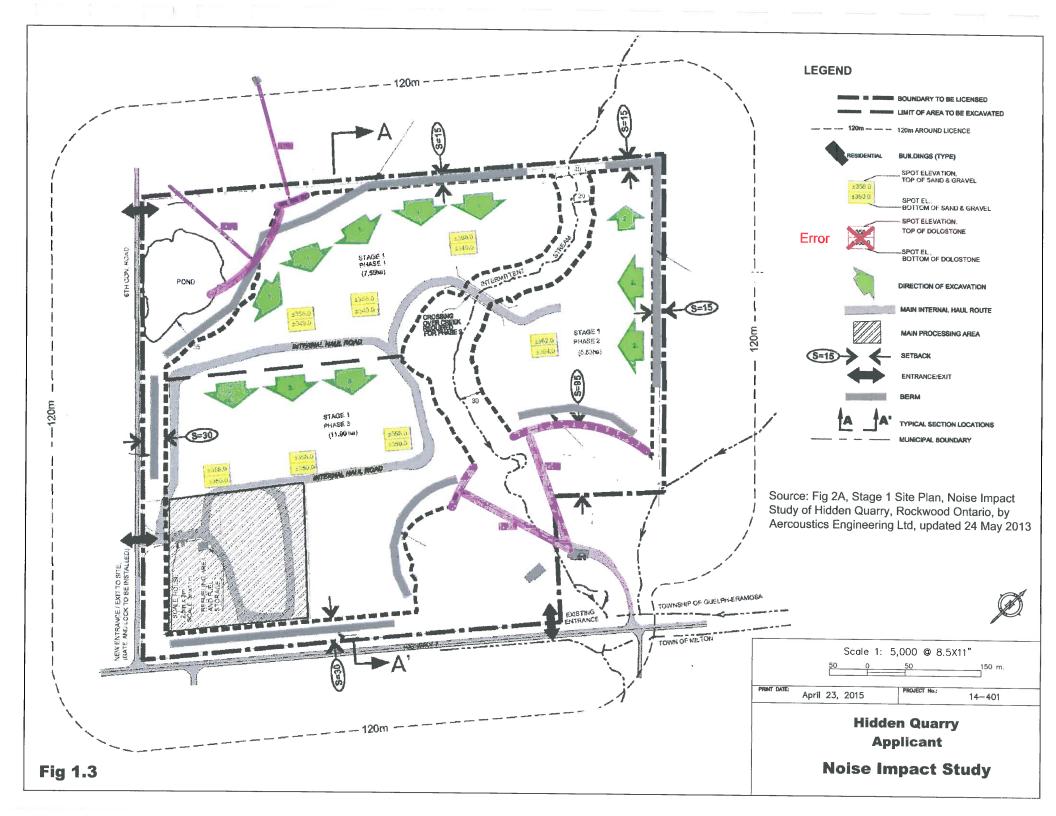
Fig 1.1A

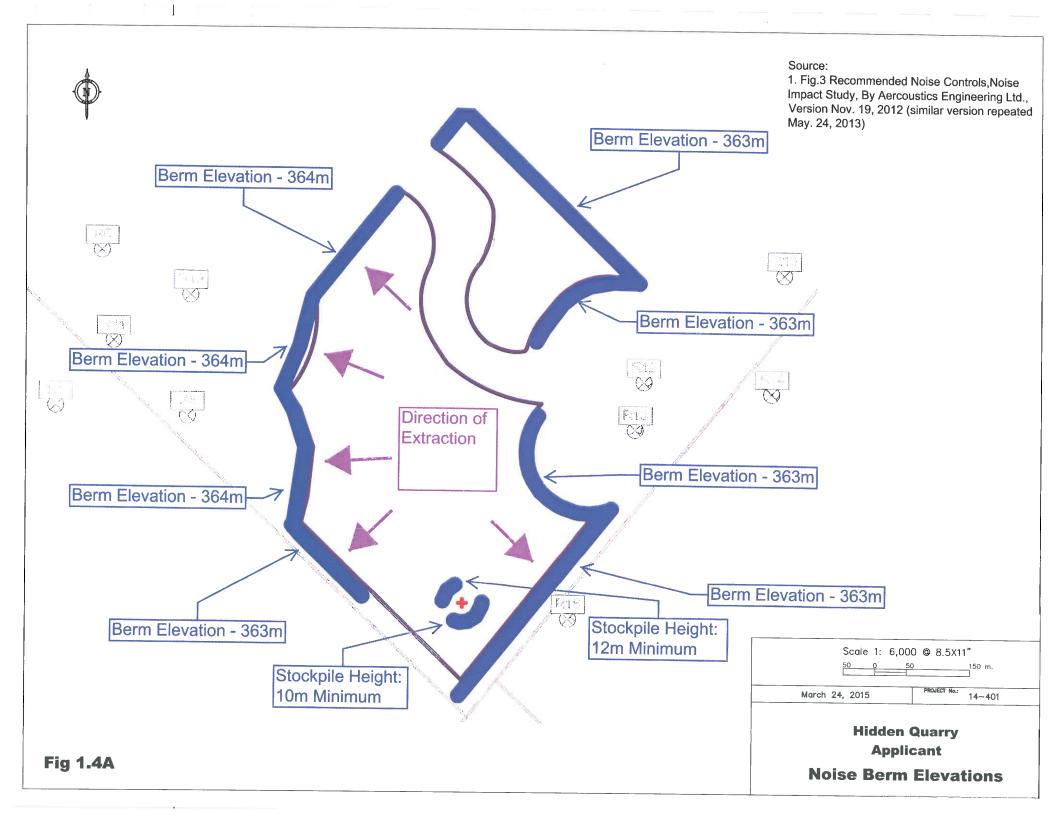


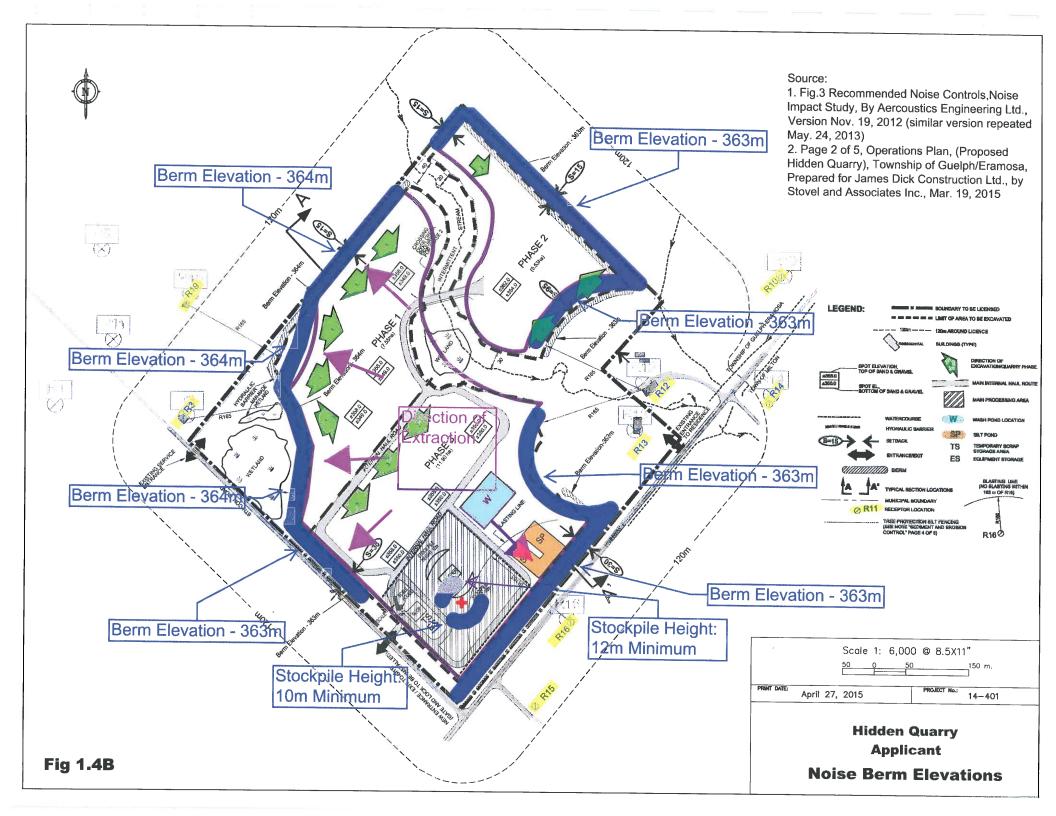


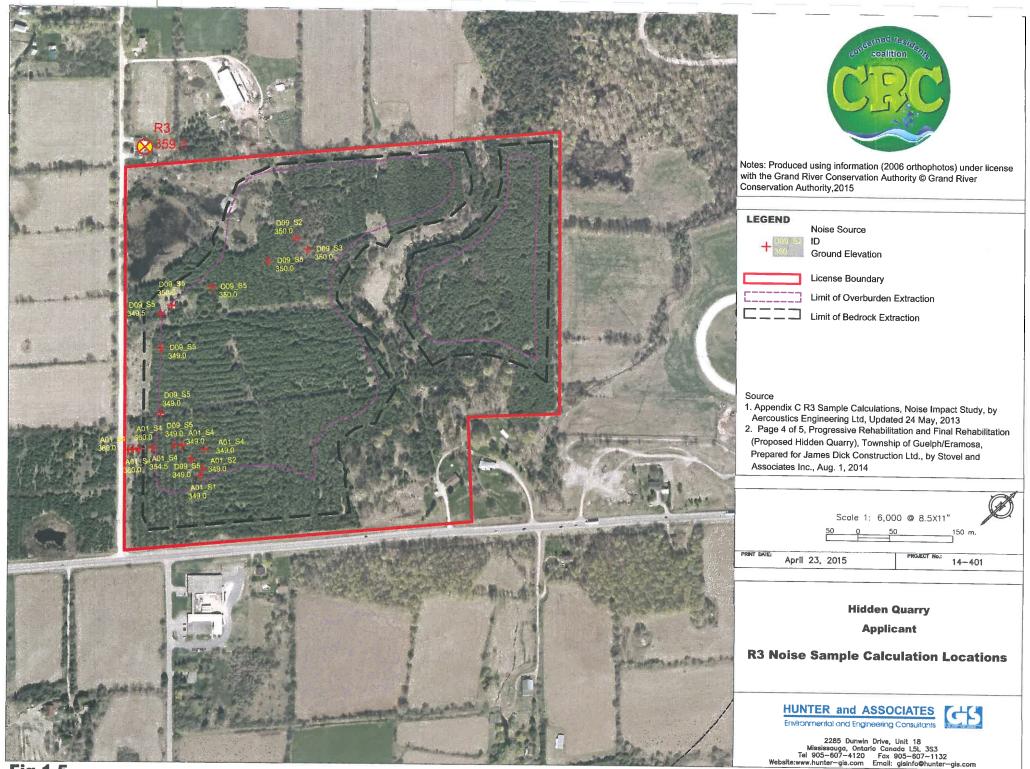
Source: Harden Environmental Services Ltd Response Letter to Burnside Review, June 10, 2014

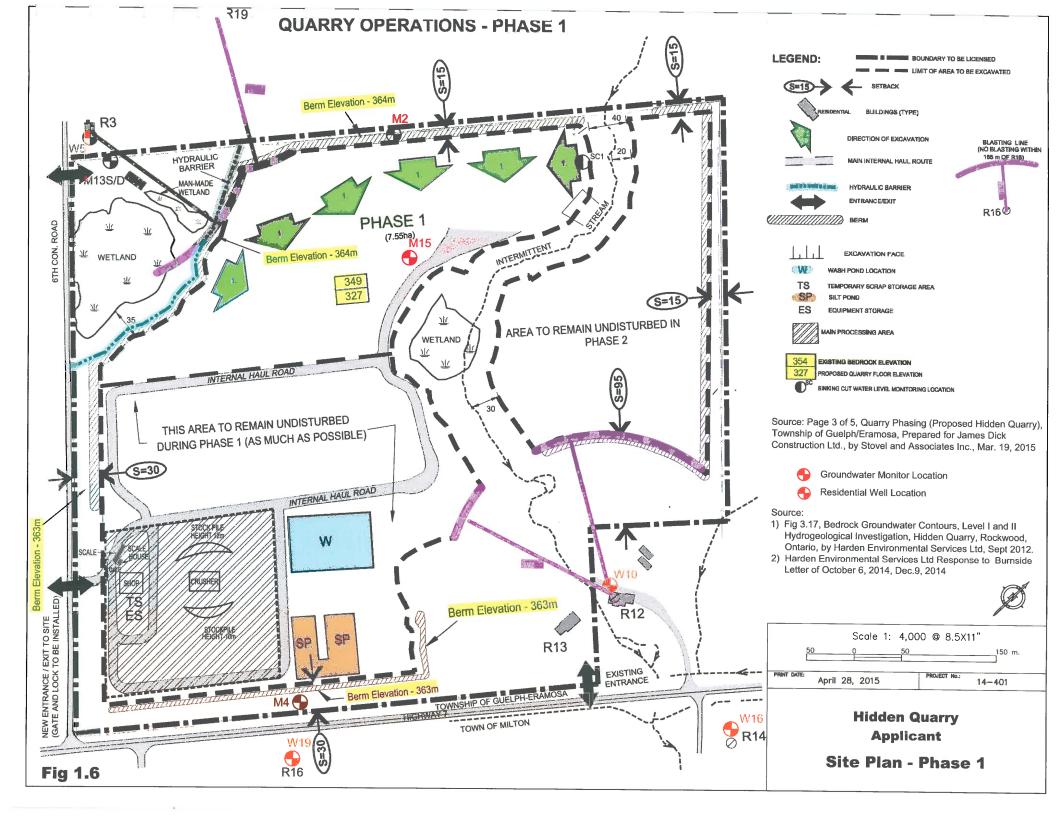


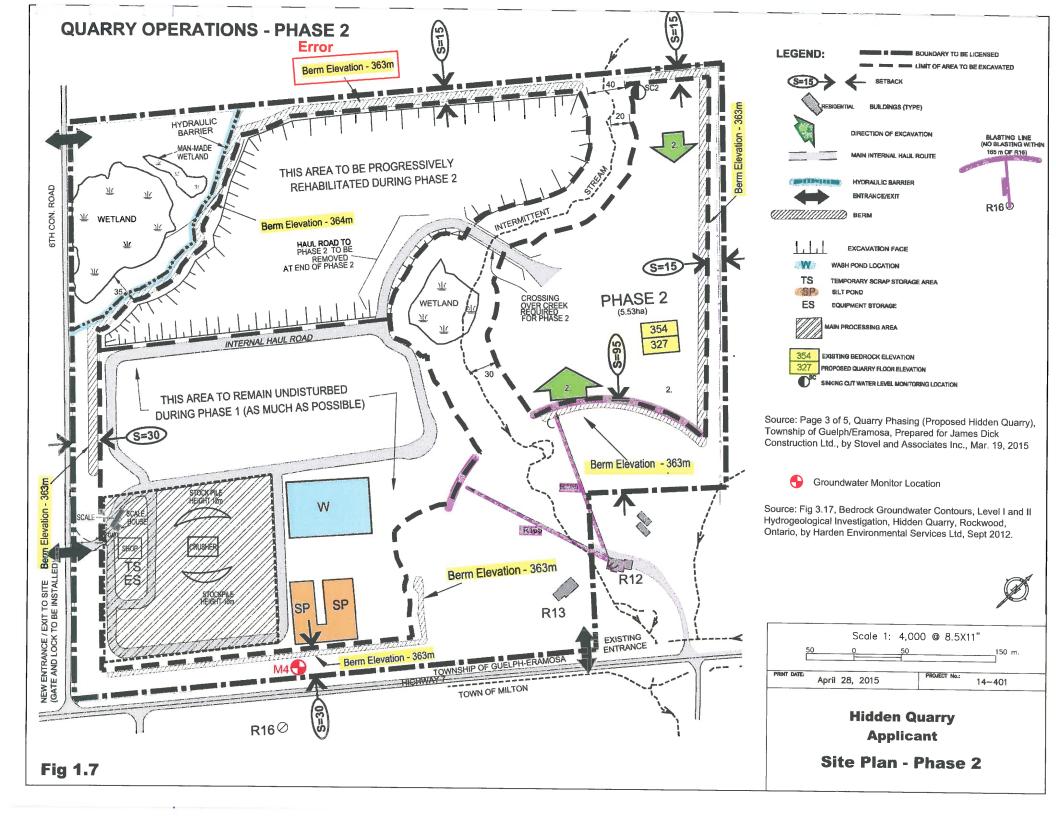


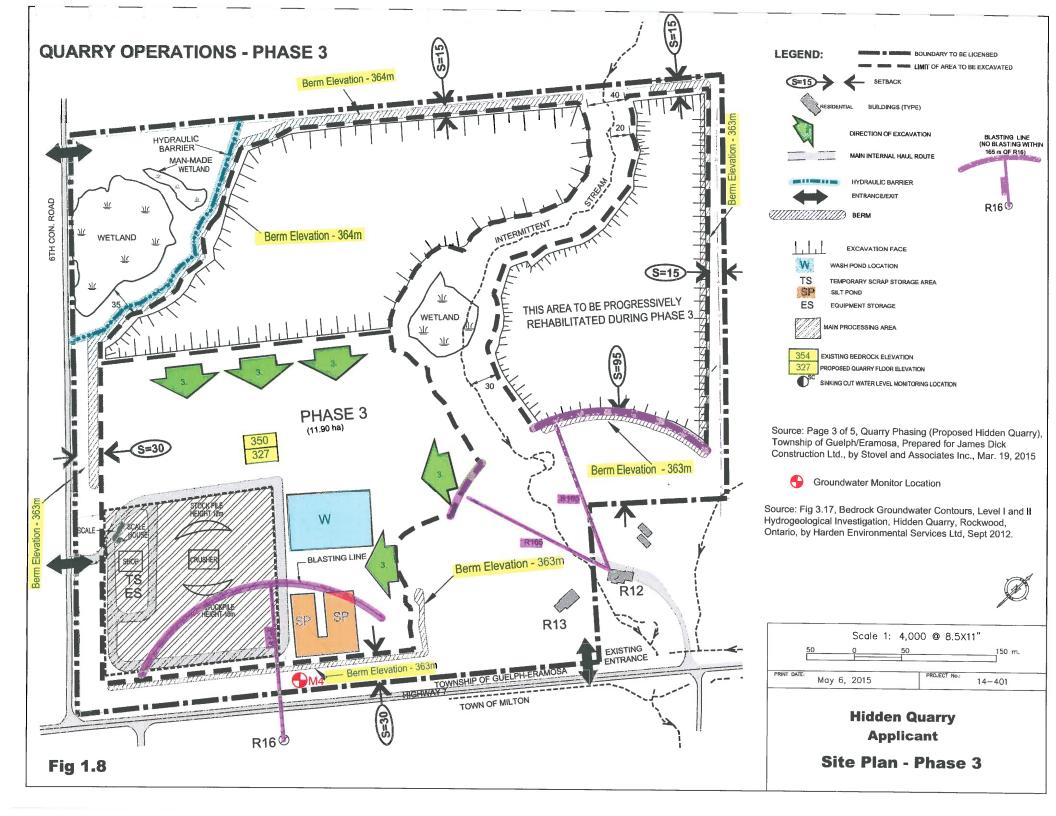


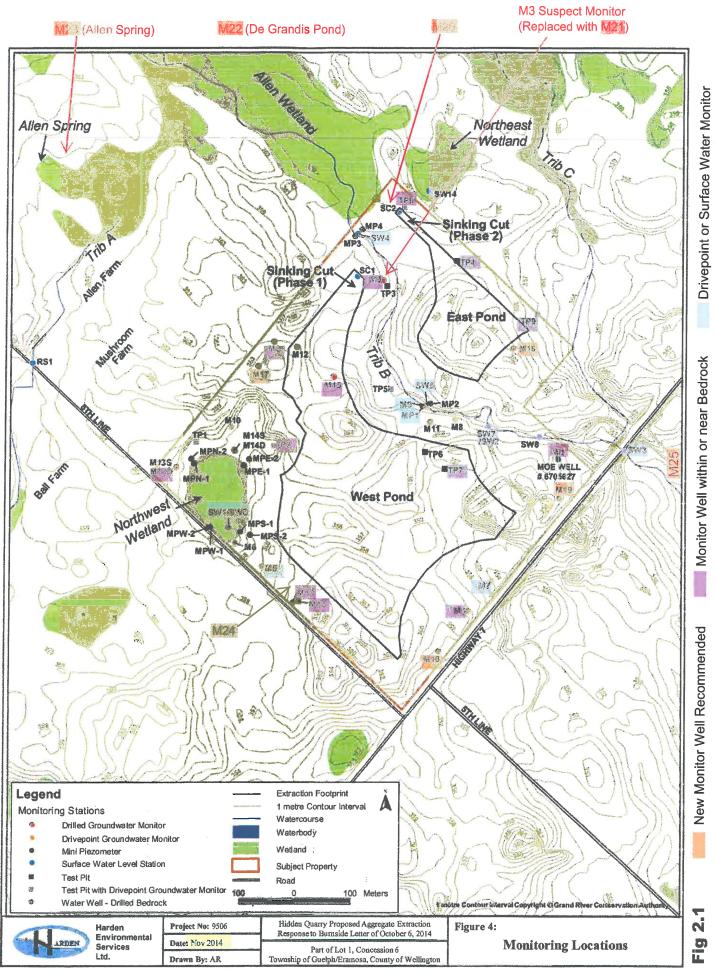












Note: M4 monitor is subjected to interference; M15 will be destroyed; M1D to be replaced.

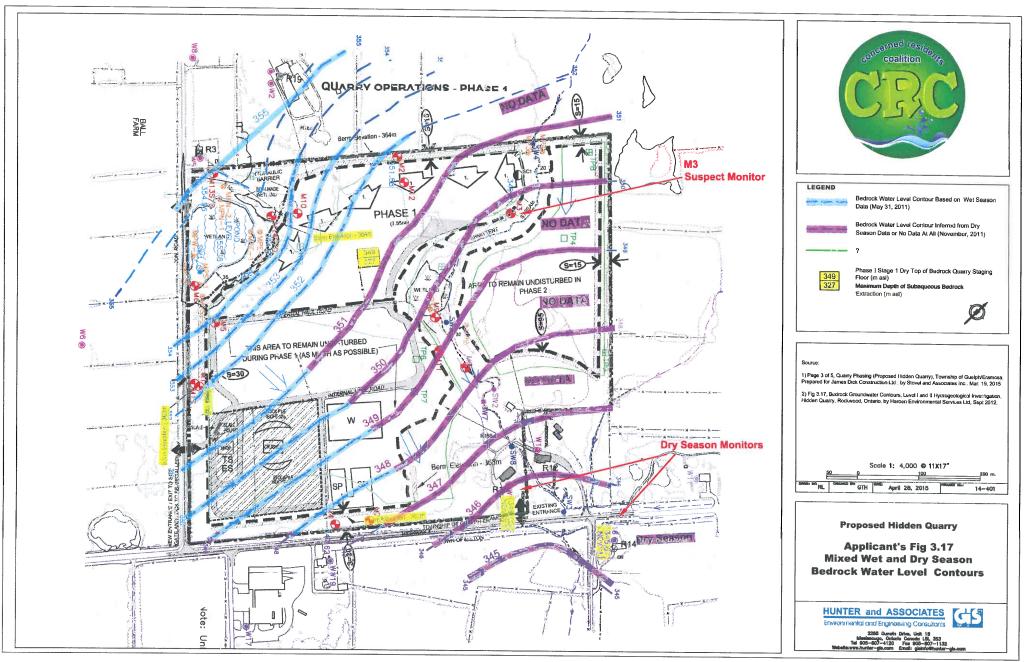
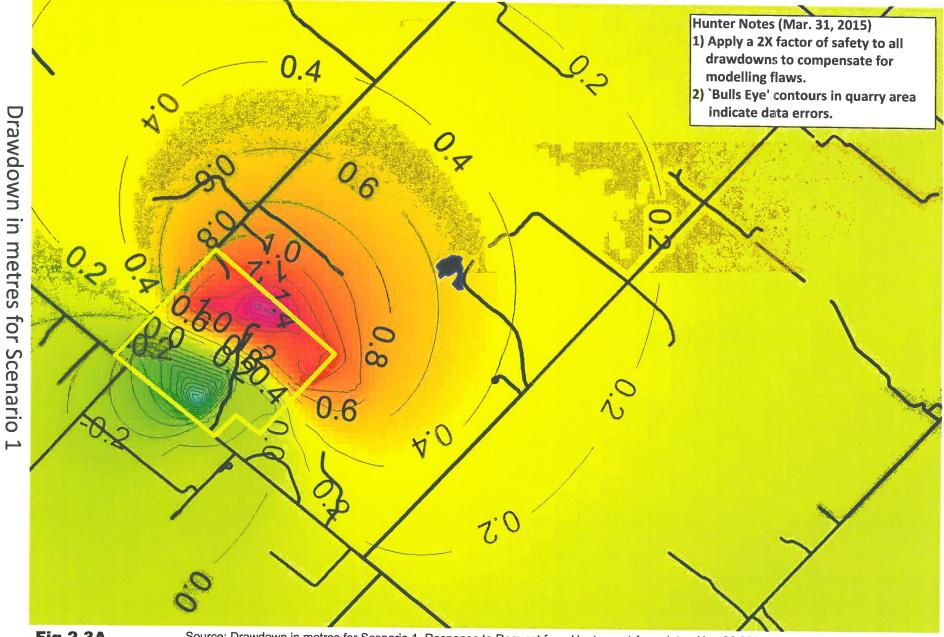


Fig 2.2





Source: Drawdown in metres for Scenario 1, Response to Request from Hunter and Associates (Jan 26 2015 email to K. Wingrove), by Harden Environmental Services Ltd, January 29, 2015

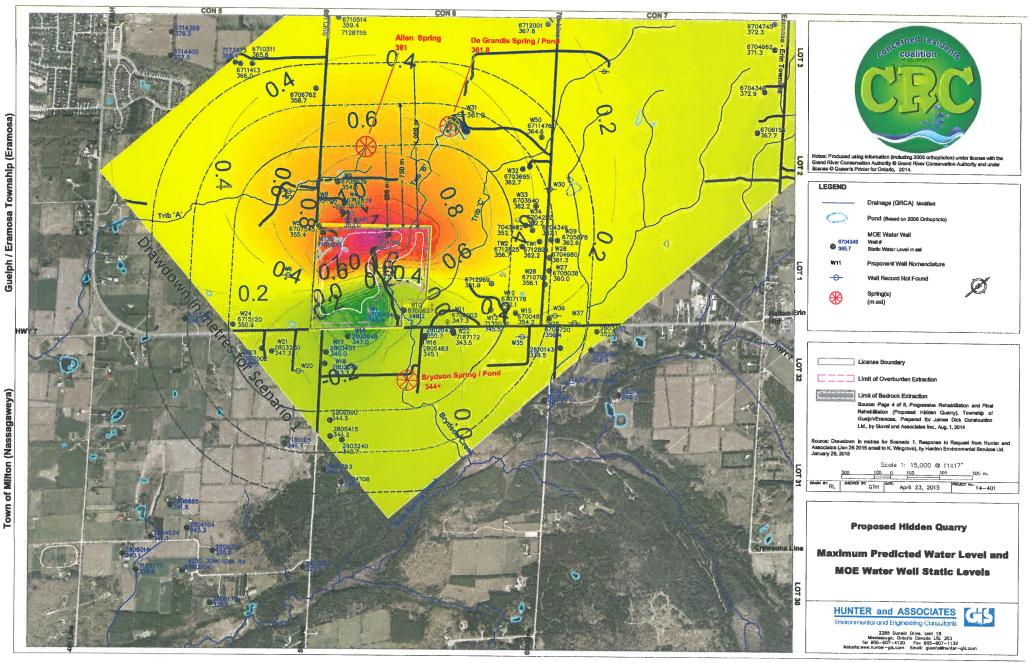
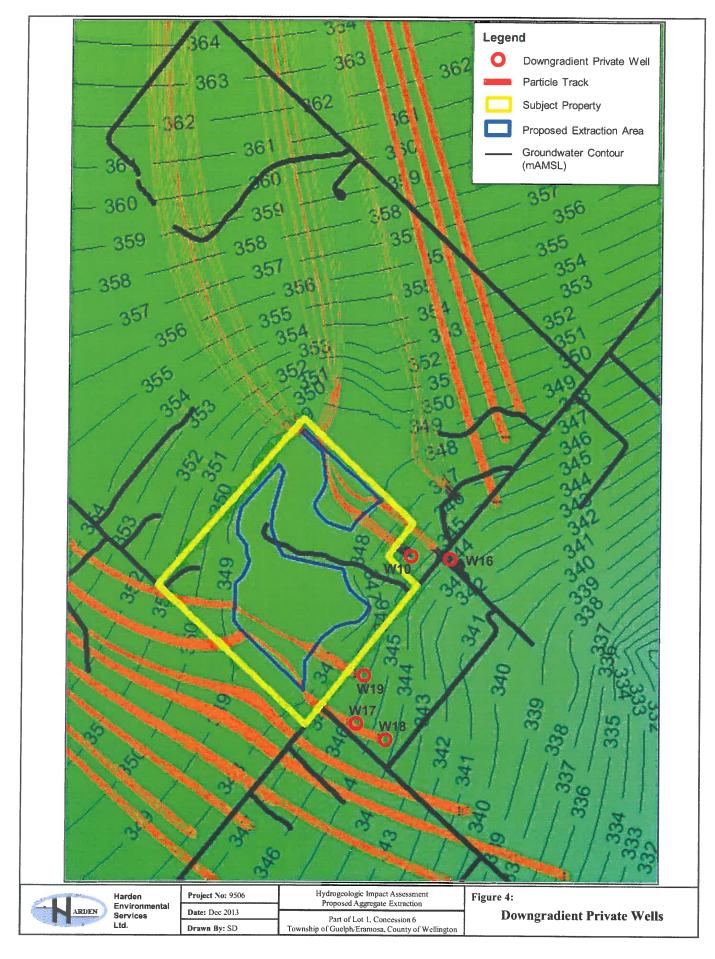
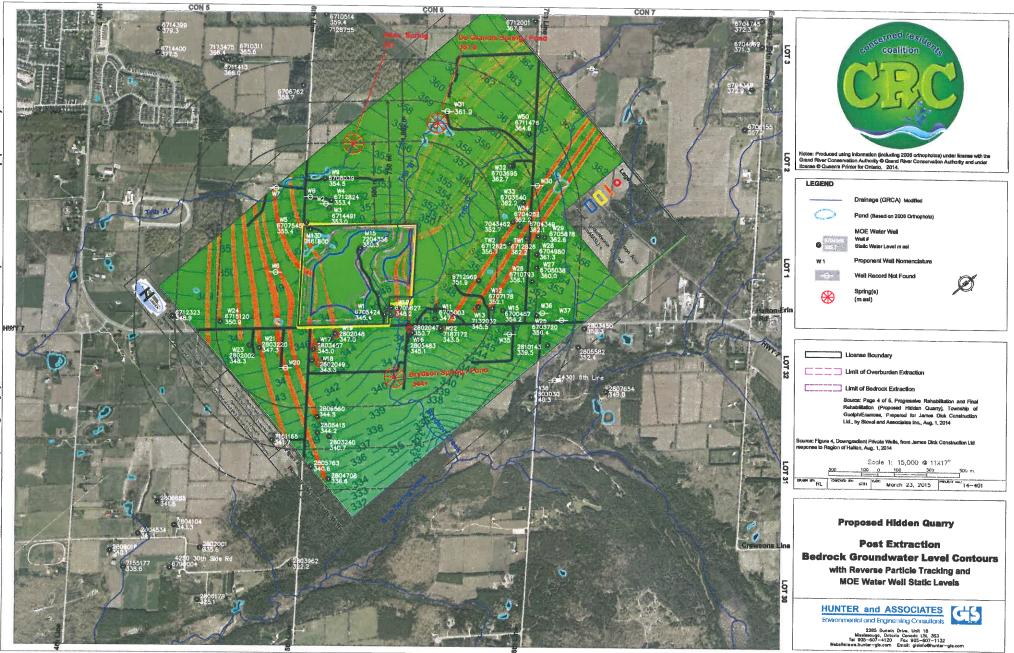


Fig 2.3B

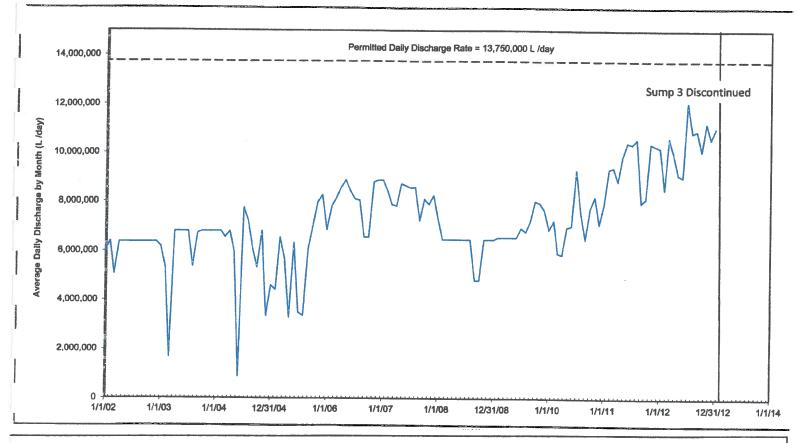


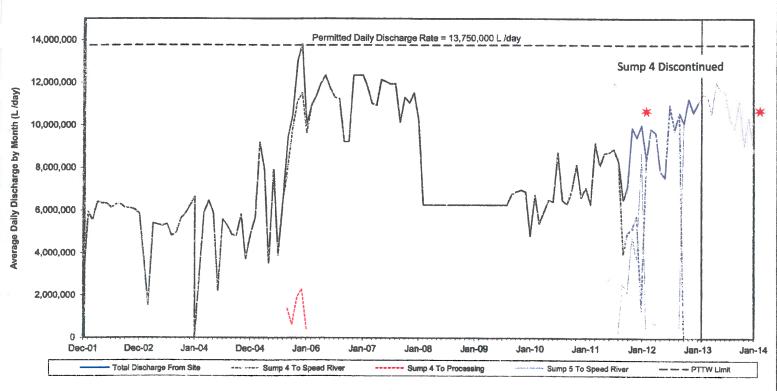




Guelph / Eramosa Township (Eramosa)

Town of Milton (Nassagaweya)

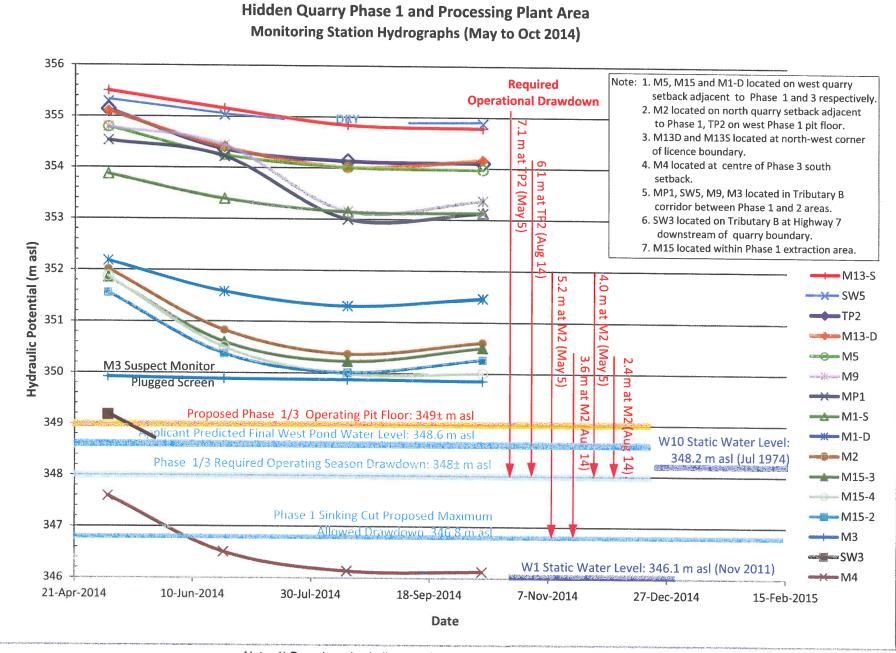




Guelph Quarry Water Discharge from Sump 3, 4, 5 2001-Jan 2014

* Water Quality Sample Event

Fig 2.5



Note: 1) Drawdown in shallow monitors may not fully develop because of the presence

of underlying aquitards or proposed hydraulic barrier influences.

2) Applicant predicted final pond water level suspect.

Mornitoring Station _Hydrograph 20150423.xlsx

Fig 3.1

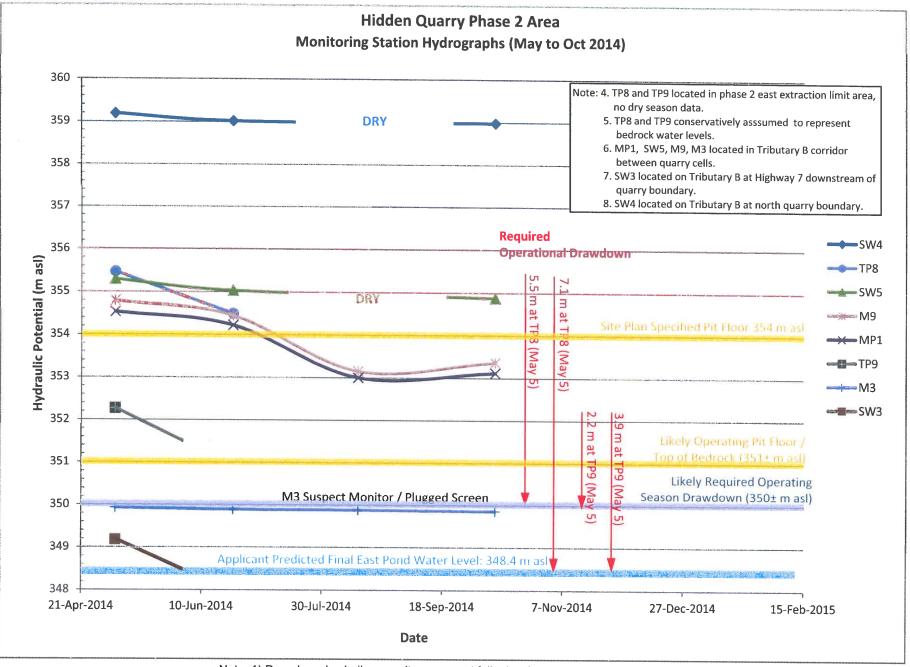


Fig 3.2

Note: 1) Drawdown in shallow monitors may not fully develop

due to the presence of underlying aquitards.

2) Applicant predicted final pond water level suspect.

Prepared by: Hunter and Associates

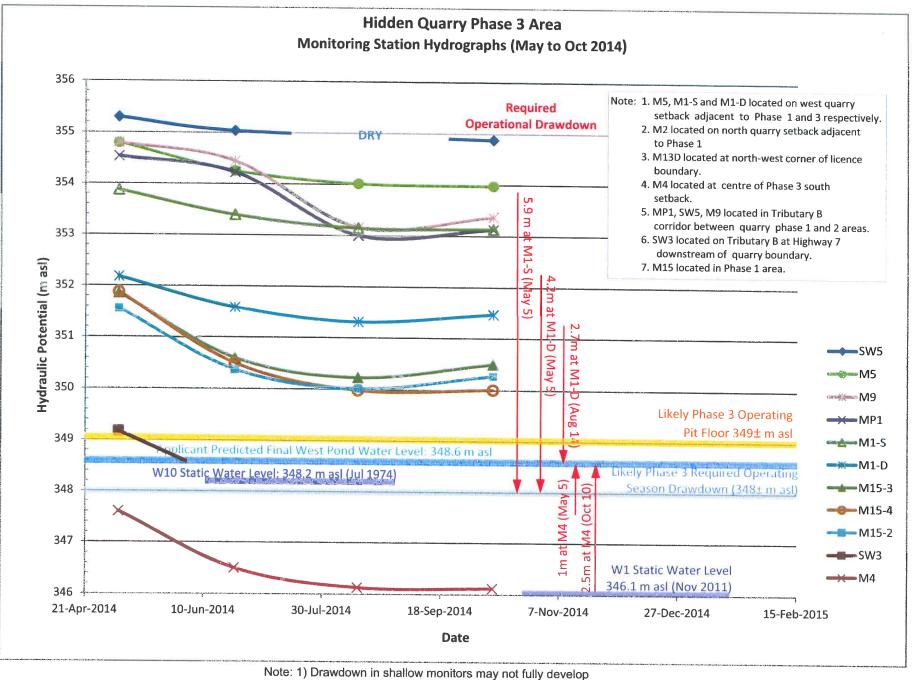
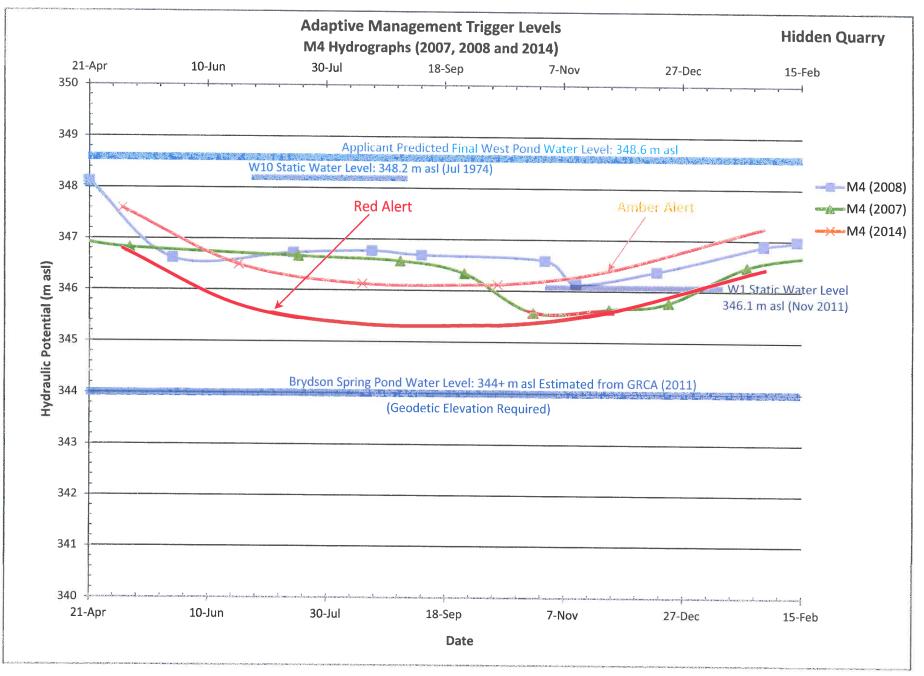


Fig 3.3

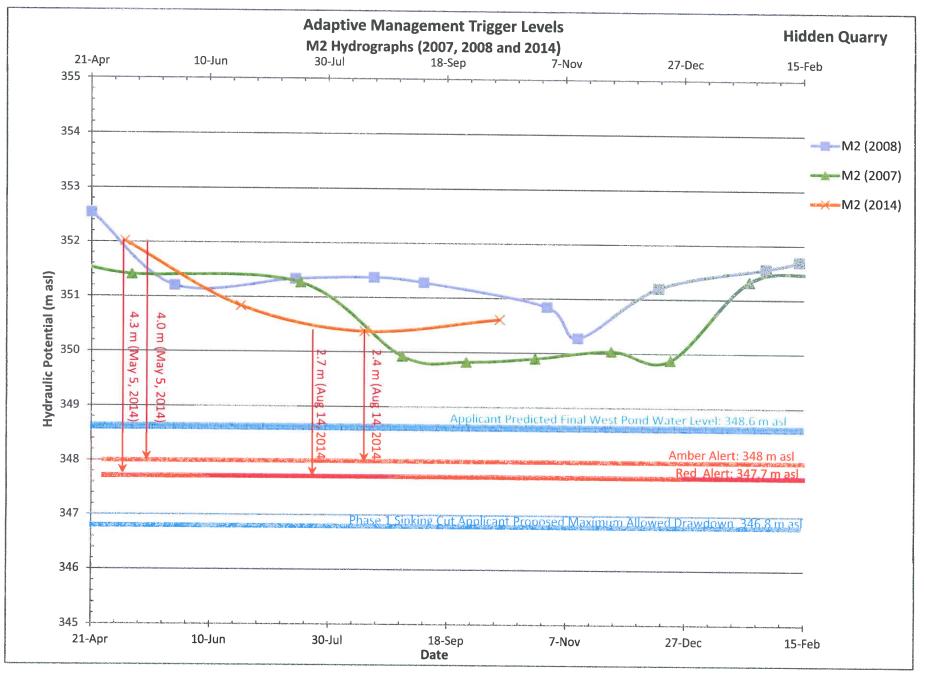
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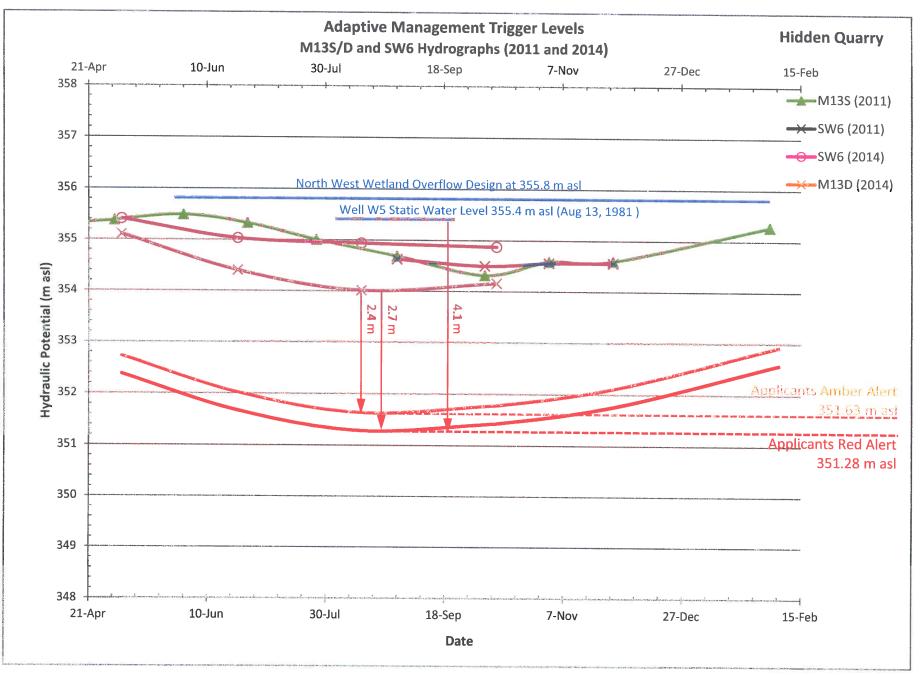
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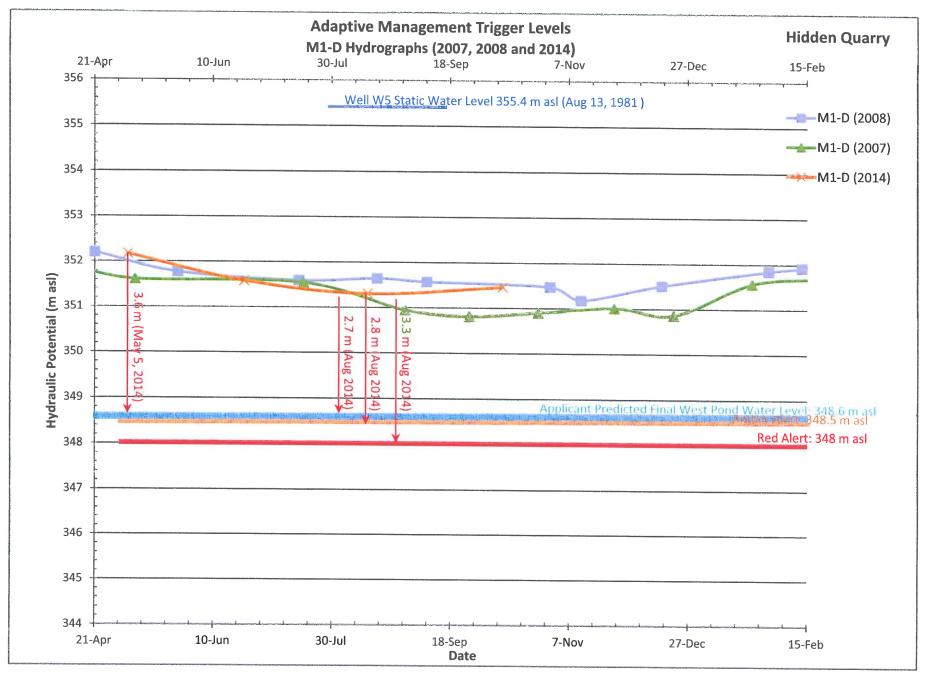
Note: Applicant predicted final pond water level suspect.



Note: Applicant predicted final pond water level suspect.



Mornitoring Station _Hydrograph 20150423.xlsx



Note: Applicant predicted final pond water level suspect.



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10 August 2015

James Dick Construction Limited 14442 REGIONAL ROAD 50 Address Line 2 Bolton, Ontario, Canada L7E 5T4

Attn: Greg Sweetnam

Re: Proposed Hidden Quarry Noise Impact Study Report Addendum #1

Introduction 1

This letter serves as addendum #1 to the Noise Impact Study¹ for the proposed Hidden Quarry development to address the following:

1. <u>Revised quarry floor elevation height for high spring water elevation level</u> The high spring water level was measured to range from 346 masl to 354 masl across the site as shown in Figure 1. In the vicinity of the process plant location the high spring water level elevation is around 350 masl.

A revision to the noise model was required to accommodate the quarry floor remaining above the high water table, specifically in the processing plant area where the quarry floor has increased from 349 masl to 351 masl. The noise model used conservative quarry floor levels of 355 masl in phases 1 and 3 and 354 masl in phase 2.

- 2. Changes to on-site truck haul routes for phases On-site truck haul routes for Phases 1, 2 and 3 have been updated based on the latest site plan.
- 3. Updated location of processing plant and stockpile locations A minor reposition of the processing plant and stockpiles was implemented in the model to reflect the location shown on the latest site plan.

¹ Aercoustics report entitled "Hidden Quarry Noise Impact Study", dated November 19, 2012, updated May 24, 2013.

2 Changes In Noise Controls

To accommodate the above listed changes, the following general revisions to the noise controls were made:

- 1) Quarry floor in the vicinity of the processing plant was changed from 349 masl to 351 masl.
- 2) The east portion of the 12 m stockpile shown on the site plan adjacent to the processing plant was extended to provide screening for R7.
- Removal of recommendation for direction of extraction. There is no requirement to use the working face as a noise control measure. Perimeter berming is will provide sufficient screening.

3 Recommended Noise Controls

With the above listed changes implemented, the following list presents the recommended noise control measures:

 12m and 10m high stockpiles should be maintained in certain locations around the processing plant for each phase and stage. The stockpile peaks should be located no further than 30m from the processing plant, and should be located such that, in plan, they block line-of-sight between processing plant equipment and sensitive receptors, as described in the table below:

Stockpiles Positioned To Shield Receptor IDs	Minimum Stockpile Height (m)			
R1 and R15 to R18	10			
R3 to R7, R11 and R19	12			

This configuration is shown in Figure 2.

- 2. A quiet drill with a maximum sound power rating of 112dBA should be used. This corresponds to a maximum sound pressure level rating of 75dBA at 30 meters.
- 3. Earth berms should be constructed to the elevations shown and located as shown on Figure 2.
- 4. The processing plant area should be established at an elevation of 351m, and a haul route trench connecting the processing plant area to the Stage 1 Phase 1 extraction area should be excavated to the same 351m elevation.
- 5. All construction equipment used in site preparation/construction must meet the sound emission standards defined in MOE publication NPC-115 and

Guelph/Eramosa Bylaw 5001/05. The relevant background information on nonstationary noise sources as well as publication NPC-115 is given in MOE Model Municipal Noise Control Bylaw, 1978 as well as the sound source exclusions defined in MOE publications NPC 205/232, 1995.

4 Predicted Noise Levels

Table 2 presents the predictable worst case noise levels at the receptors.

	Daytime (07:00 – 19:00)		Early Morning (23:00 – 07:00)	
	Overall Worst		Overall Worst	
Receptor		Calculated Sound		Calculated Sound
	Sound Levels	Level Limit	Sound Levels	Level Limit
R01	50	50	36	45
R02	49	51	33	45
R03	45	45	27	40
R04	41	45	25	40
R05	41	45	22	40
R06	39	45	21	40
R07	39	45	22	40
R08	41	45	22	40
R09	42	45	23	40
R10	48	53	32	45
R11	42	45	24	40
R12	49	50	33	45
R13	48	50	31	45
R14	48	53	32	45
R15	45	50	32	45
R16	49	57	35	45
R17	41	45	28	40
R18	43	45	32	40
R19	45	45	27	40

Table 2 Predicted Worst-Case Noise Levels in dBA

5 Closure

Please do not hesitate to contact the undersigned if you have any questions.

Yours Truly,

alles

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