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MEMORANDUM

DATE:	2025-08-21	RWDI Reference No.: 2512741
TO:	David Schulz	EMAIL: DSchulz@walkerind.com
CC:	Matt Betram	EMAIL: mbertram@skeltonbrumwell.ca
FROM:	Brian G. Sulley	EMAIL: Brian.Sulley@rwdi.com
RE:	Discussion of Potential Air Quality Impacts Redford Pit Expansion West Grey, Ontario	

Dear David,

RWDI was retained by Harold Sutherland Construction Ltd ("the client"), a subsidiary of Walker Aggregates Inc., to review potential dust emissions associated with their proposal to establish a new aggregate extraction operation (hereafter referred to as "the Project", and/or "the pit expansion") with an annual extraction limit of up to 300,000 tonnes.

Extraction will occur to a depth no lower than 1.5 metres above the established water table. The pit expansion is to be located immediately adjacent to the client's existing Walker Redford Pit, on lands legally described as North ½ of Lot 20, Concession 5 NDR, located north of the intersection of Allan Park Road and Concession 4 NDR (referred to as "the Site" and/or "the subject lands").

To authorize the pit expansion, the client is applying for a Class "A" Pit Licence (Above Water) under the Aggregate Resources Act ("ARA"). Concurrently, a Zoning By-law Amendment application will be submitted to the Municipality of West Grey under the Planning Act to permit aggregate extraction on the subject lands.

The primary air emissions associated with sand and gravel extraction consists of fugitive dust, and tailpipe emissions associated with vehicles and heavy equipment.

Tailpipe emissions associated with vehicles and heavy equipment are already regulated by the Federal government under On-Road Vehicle and Engine Emission Regulations (SOR/2003-2) and the Off-road Compression-Ignition (Mobile and Stationary) and Large Spark-Ignition Engine Emission Regulations (SOR/2020-258). Equipment associated with the operations at the site must comply with these regulations.



David Schulz
Walker Aggregates Inc.
RWDI#2512741
August 21, 2025

Fugitive dust is normally managed at aggregate facilities through a Best Management Practices Plan ("BMPP"), developed in accordance with the Ontario Ministry of Environment, Conservation and Parks ("MECP"), "Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources", ("MECP Technical Bulletin") dated February 2017.

A BMPP is specifically intended to minimize and mitigate any potential adverse effects, thereby protecting public health and safety. If the BMPP is found to be deficient in some way, Section 3 lays out the responsibility for ensuring the plan is implemented, and Section 4 lays out the requirement to review the plan annually.

RWDI has developed BMPPs and peer reviewed BMPPs for sites across Ontario, including large scale infrastructure construction projects, aggregate extraction, cement production and mining. This BMPP is equivalent to the level of control required at any similar facility with which I am familiar.

RWDI recognizes that there are both existing and proposed aggregate operations in the local area. An effective BMPP is intended to minimize and mitigate any potential adverse effects at the nearest sensitive receptors and considers other nearby sources of dust if there is a possibility of cumulative impacts due to operations similar facilities.

All aggregate sites, regardless of the date at which they are licenced, are prohibited from causing adverse effects in accordance with Section 14 of the Ontario Environmental Protection Act. Furthermore, most aggregate sites have a requirement under the ARA to mitigate dust on-site, or a similar condition.

Therefore, it is expected that potential cumulative effects due to operations at the Project and other nearby aggregate facilities are minimized.

With the implementation of the BMPP, it is expected that the Project will not result in unacceptable air quality impacts in the surrounding community, and that the potential for adverse effects will be minimized.

Yours truly,

A handwritten signature in black ink, appearing to read 'B. Sulley', written over a light blue horizontal line.

Brian G. Sulley, B.A.Sc., P.Eng.
Technical Director, Principal
RWDI

August 21, 2025
Attach.