

**ALLARD DISTRIBUTING LTD.  
HUGUETTE LAKE QUARRY PERMIT,  
LABRADOR WEST**

***Environmental Assessment  
Registration Document***

Submitted by:  
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## **1.0 NAME OF UNDERTAKING**

Huguette Lake Quarry Permit

- Quarry Permit Identification
  - File 711:12216 covering 6.5 ha

## **2.0 PROPONENT**

### **2.1 Name of Corporate Body**

Allard Distributing Ltd.

### **2.2 Address**

1501 Luce Road  
P.O. Box 421  
Labrador City, NL  
A2V 2K7

### **2.3 Chief Executive Officer**

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A2V 2K7  
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### **2.4 Principal Contact Persons**

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### **3.0 THE UNDERTAKING**

#### **3.1 Nature of the Undertaking**

The proposed project is a 6.5 ha quarry permit (File 711:12216) that will be developed as a source of surficial sand and gravel aggregate.

#### **3.2 Purpose/Rationale/Requirement for the Undertaking**

The main purpose and rationale for this project is to develop the quarry as a source of sand mainly to be used as winter road sand, but also to supply local markets in Labrador West. A quarry permit was first applied for in 2017 for a 1.56 ha area, however in 2018 Allard increased the size of the quarry application area to 6.5 ha due to the nearly exhausted resources in the proponent's other quarries in Labrador West.

### **4.0 DESCRIPTION OF THE UNDERTAKING**

#### **4.1 Geographic Location**

The project is located approximately 16.2 km southwest of Labrador City, and on NTS Map Sheet 23B/14, entirely within the Municipality of Labrador City (**Figures 1 to 3**). The project's location is zoned as Mineral Reserve - Rural under the Town of Labrador Cities Municipal Plan whereby quarrying is a permitted land use. Under the Provincial Forestry Services Branch the quarry permit application is located in a much broader area zoned as a domestic cutting area. Sensitive human receptors located near the proposed project area are shown on **Figure 4** and consist of a cluster of private cabins/dwellings, the closest of which is located 590 m from the nearest project boundary. The project area is also situated between the Bloom Lake Mine Railway (935 m to the northwest) and the Trans-Labrador Highway (1,610 m to the southeast).

#### **4.2 Physical Features**

##### **4.2.1 Project Site Description**

Topography is generally hilly with elevations ranging from 600 m to 800 m above sea level for several kilometers surrounding the area. The project itself sits at an elevation of approximately 620 m. Adjacent to the quarry permit area are several quarry permits (**Table 1 – Figure 3**) held by Grey Rock Services Inc. (Grey Rock). The primary physical feature of this project will be the quarry itself. The closest body of water to the project is a brook that drains into Huguette Lake and the brook is located 40 m away from the nearest permit boundary. A small inlet of the brook extends away from the river and is at its closest 5 m away from the permit boundary. The next nearest body of water is a pond approximately 1.2 ha in size located 115 m northeast of the project.

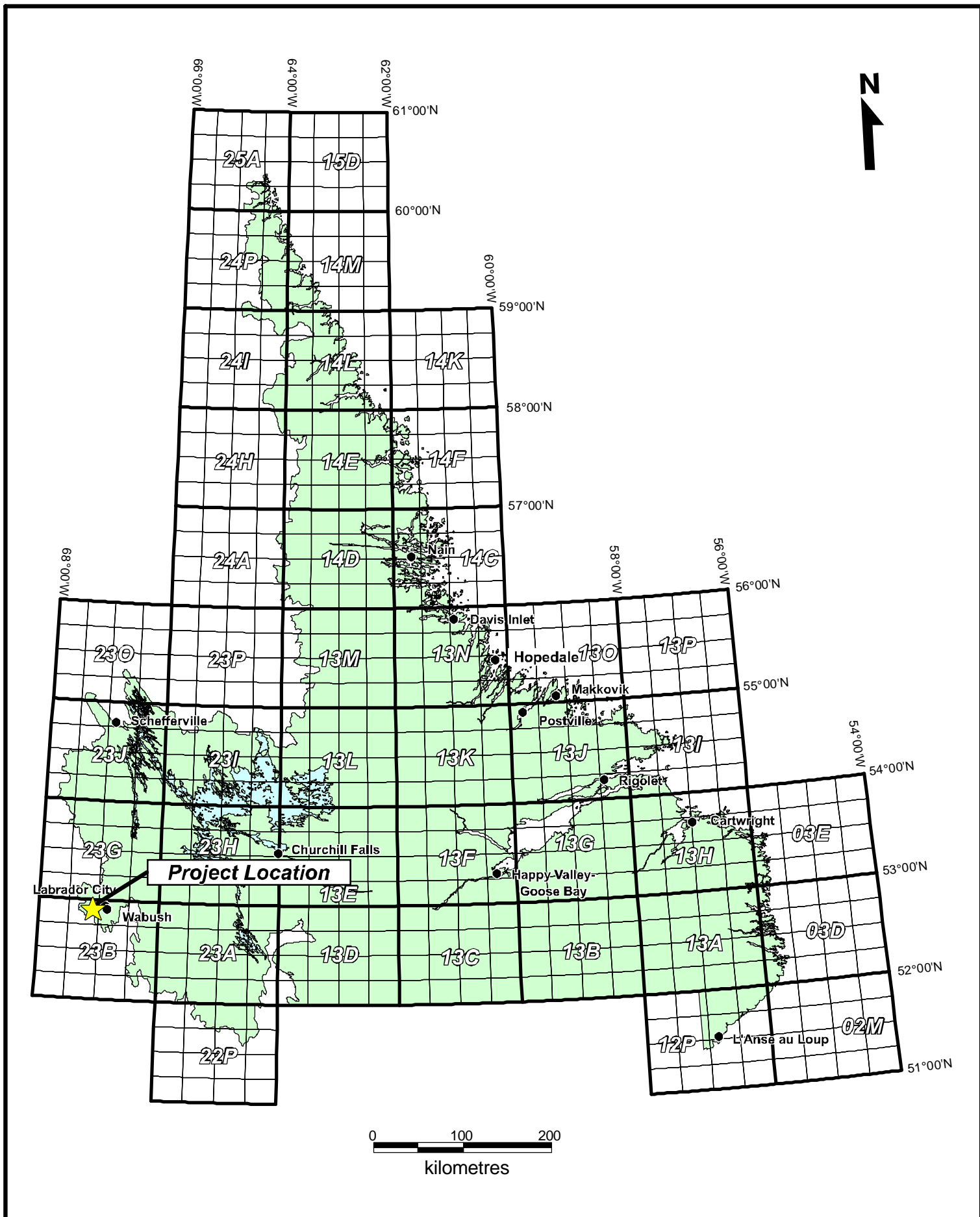


FIGURE 1: PROJECT LOCATION MAP (N.T.S. 23B/14)

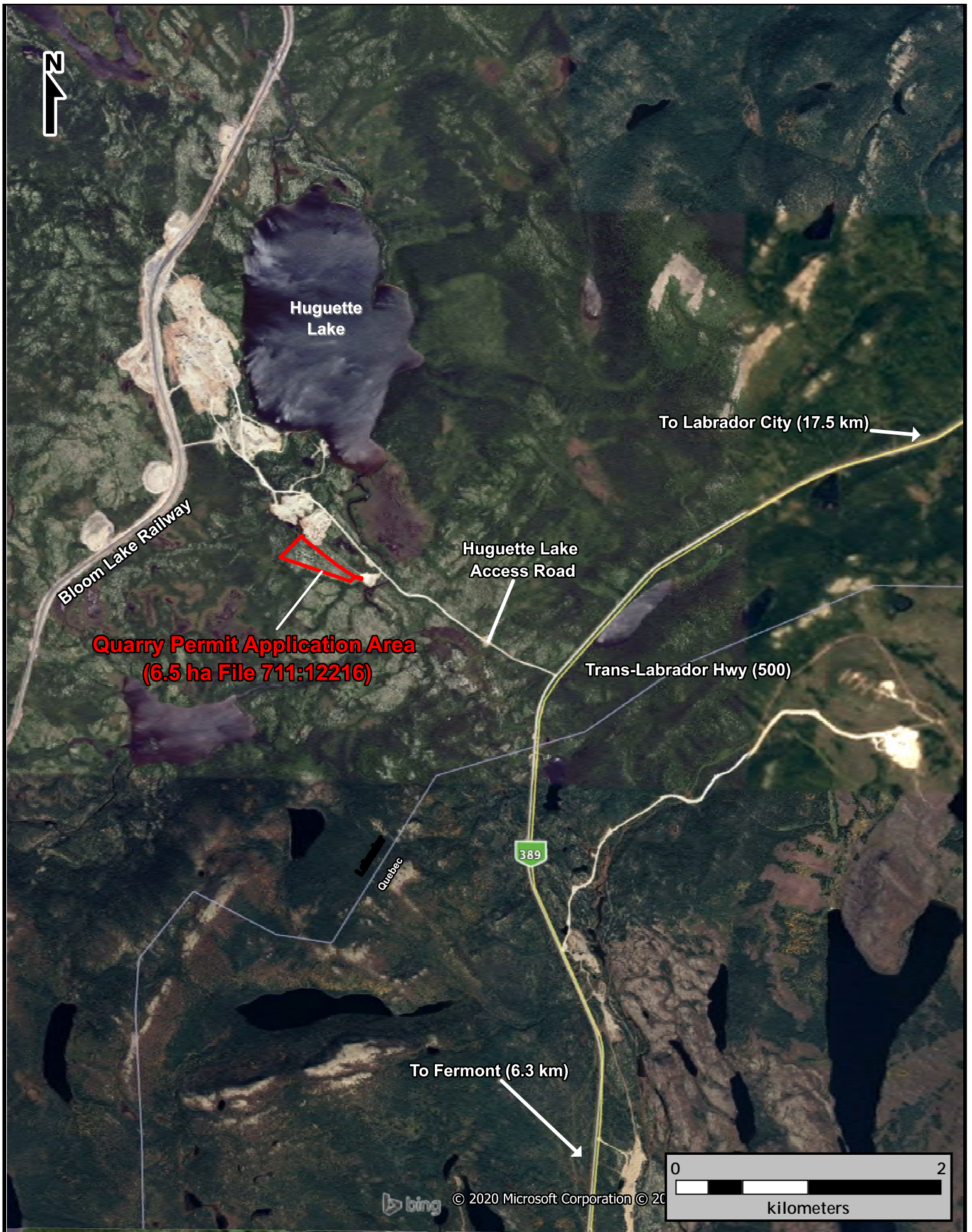


Figure 2: Quarry Permit Location Map



Figure 3: Detailed Quarry Permit Location Map





Figure 4: Receptors Location Map

**Table 1: Active Quarry Permits in the Immediate Area of the Project**

File #	Permit ID	Permit Type	Comapny	Size/Area (ha)
142431	711:6327	Quarry Permit	Grey Rocks Services Inc.	0.5
142434	711:6656	Quarry Permit	Grey Rocks Services Inc.	1.2
142451	711:9017	Quarry Permit	Grey Rocks Services Inc.	2.5
142447	711:6944	Quarry Permit	Grey Rocks Services Inc.	4.0

## **4.2.2 Existing Biophysical Environment**

The proposed quarry site is located within the *Mid Subarctic Forest* (Michikamau) *Labrador Ecoregion*. The climate in this region is characterized as continental and subarctic with cool, short summers, and cold and severe winters. Open lichen woodlands are characteristic of the region with extensive ribbed fen & string bog complexes. Bogs are usually bordered with dominant black spruce forest stands; aspen and jack pine also occur in this ecoregion. The area within the quarry permit boundaries is typically covered in caribou lichen and broadly spaced black spruce.

## **4.3 Construction and Operation**

The construction aspect of the proposed project will consist of clearing the site from trees and grubbing. This process will be gradual and in conjunction with the advancement of the development aspect of the project typically on a yearly basis.

### **4.3.1 Site Access**

Access to the site is gained via a gravel road (Huguette Lake Access Road) that intersects the Trans Labrador Highway (TLH – Highway 500) 17.5 km from the town of Labrador City and 6.3 km from Fermont, Quebec (**Figure 3**). The quarry area is located 1.5 km along the gravel road and access to the site will be through the existing/developed and adjacent Grey Rock quarry permits under File 711:6327 & 711:6656 as presented on **Figure 3**. Due to the general openness of the overall area and low forest density it will be difficult to initially control access at the entry point of the quarry which is located along the boundary of an adjacent quarry area being developed. As development proceeds and organics are windrowed, a combination of windrowed material, armourstone and a locked gate will be utilized to secure the quarry area.

### **4.3.2 Site Clearing**

Site clearing will be done gradually and in conjunction with the advancement of quarry development. A significant number of the trees inside the quarry area are small and not considered merchantable timber. The remaining merchantable timber present will be cleared by manpower and handheld chainsaws and will be harvested under a cutting permit issued by the Department of Fisheries and Land Resources. The wood will be made available to local communities to be used as firewood. Surficial soils, subsoils and grubbing will be stripped and windrowed to the permit boundary. This windrowed material will be used to construct perimeter berms as required. The perimeter berm along the northeast side of the quarry permit area may not be required depending on the development stage of the adjacent permit holder. In this case the grubbing will be windrowed to the southwest and northwest quarry permit boundaries.

### **4.3.3 Quarry Development and Operation**

Development of the quarry will expand from the quarry's entry point towards the West. Annual production from the site is anticipated to be between 12,000 to 20,000 tonnes per year. Development activities to be undertaken will consist of the gradual removal and stockpiling of organics to the perimeter of the site. Operational activities will consist of pit run removal and transport of aggregate resources. This will be performed using heavy equipment such as excavators, front end loaders and dump trucks. Processing activities may consist of screening. Typical quarrying activities will take place approximately between May and September of each year but will ultimately be dictated by the timing of seasonal spring melt and the onset of winter conditions.

## **4.4 Potential Sources of Pollution During Construction and Operation**

The construction and operational phases of the development will utilize equipment such as chainsaws, front end loaders, dump trucks and excavators. This equipment represents a potential source of noise disturbance, exhaust emissions, the potential release of petroleum hydrocarbons, dust, domestic waste, and general refuse. Also, construction and operational activities introduce the possibility of erosion and transport of fine-grained particles such as clay and silt to nearby water bodies.

Air pollution will be controlled by having all equipment on site fitted with the appropriate emission-control equipment, and dust will be kept at a minimum by the watering of roads as required. If required, screeners will be fitted with water suppression equipment to

reduce dust. Water can either be trucked in via a water truck from nearby Municipalities or sourced from nearby natural water sources under a Water Use License to be issued by the Provincial Water Resources Division.

Noise levels associated with the type of heavy machinery that will be used are not anticipated to reach levels problematic to the general public. There have been no documented complaints of noise related to several quarry operations already present in the area. Workers will have the proper hearing protection and the work site, as noted above, is a controlled work environment.

Domestic waste generated during construction will be collected and disposed of in accordance with the Waste Material Disposal Act. A portable toilet will be installed inside the quarry, sewage will be handled and maintained by an approved sewage service provider.

Fuel will not be stored on site but will be brought in as required by a petroleum product service company. The handling of petroleum products on site will comply with the Storage and Handling of Gasoline and Associated Products Regulations. Complete and regularly checked emergency spill kits will be available on site at all times for containment and cleanup of any hydrocarbon leaks. Any leaks or spills in excess of 70 liters will be reported immediately to the Environmental Emergency Telephone Line and will be cleaned up immediately.

The erosion and transport of fine-grained particles during construction and operational activities will be controlled by using appropriate mitigating measures such as erosion control ditches, check dams, hay bales and silt fencing. Site runoff will ultimately be directed towards vegetated areas, acting as a filter for fine particles (See **Section 4.5** below).

#### **4.5 Potential Resource Conflicts During Construction and Operation**

Potential resource conflicts during operations and aspects to be addressed with this undertaking are related to the visual aspect of the quarry for individuals travelling on the nearby Trans Labrador Highway, sediment erosion and control within the quarry, and impacts on wildlife. The following design considerations are provided to address these concerns and will be applied as preventative measures:

- The site is located 1.6 km from the Trans-Labrador Highway (TLH) and is currently not visible from the Highway. The proponent will ensure a tree screen is kept

between the project and the highway to ensure the project is concealed from view from the TLH.

- A small portion of the quarry permit area is located inside the required 50 m stream buffer. That portion will be made a protected area, and ultimately no disturbance or resources will be excavated within 50 m of any body of water (see **Figure 3**). Additionally, within the proposed 6.5 ha area, a 5 m wide buffer will be left inside along permit boundaries where no resources will be excavated. Berms constructed from the windrowed organics will be placed within buffers and will serve as an additional protection/filter against sediment runoff. These berms will also help control access to the quarry area from areas beyond the main access road.
- Should water runoff become a problem, erosion and sediment control measures in line with industry best management practices will be utilized. This will include silt fencing, hay bales and erosion control ditches with rock check dams to prevent drainage of suspended solids into a body of water. Also, a small settling depression may be constructed to temporarily hold water within the quarry and allow for suspended sediment to deposit prior to water being released into vegetated areas. Site water will be directed away from the stream and along drainage ditches with check dams. It should be noted that a sand and gravel aggregate resource is naturally permeable reducing the amount of site runoff.
- The pit floor will be kept lower than the perimeter berms, where present, as it progresses so as to contain precipitation water within the quarry site.
- Gradual clearing of trees during quarry development, as opposed to complete clearing before proceeding to development, will greatly reduce the exposed mineral soil and reduce erosion and transport of fine-grained particles.
- The area is not known to be frequented for hunting or fishing in general. With respect to wildlife and their habitat, the site will be developed and be operated following the established legislation and guidelines of the *Wild Life Act (CC. 96-809)*, and any encounter with wildlife shall follow the regulations stated in this Act.

## 4.6 Occupation

The occupations required for this development are listed below and classified as per the National Occupational Classification (2011):

### **Construction**

- 1 Quarry Supervisor (8221)
- 2 Heavy Equipment Operator – Loader/Excavator (7521)
- 1 Logging and Forestry Laborer (8616)

### **Operation**

- 1 Quarry Supervisor (8221)
- 2 Heavy Equipment Operators – Loader, Excavator, Screening (7521)
- 3 Heavy Equipment Operators – Tandem, Tandem-Tandem and/or Semi Dump Trailers (7521)

Operation of the quarry will necessitate approximately 6 full time employees during the construction season. Some of the employees will be utilized to both clear the quarry site (Construction Phase) and extract/process material (Operational Phase). All required personnel will be filled with currently hired Allard Distributing Inc. staff.

### **4.7 Reclamation and Closure**

Progressive reclamation will begin when feasible from a development perspective and when all resources are removed from an area. The quarry will be rehabilitated within the Department of Natural Resources' quarry permit guidelines. Quarry faces will be resurfaced to implement 30-degree sloping. Subsequently, the previously windrowed and preserved organic material that was stripped during the construction phase will be re-spread to promote natural revegetation. Once the quarry reaches a development phase that will not require additional expansion, then progressive reclamation will begin to allow for revegetation of the site as quickly as possible.

### **5.0 APPROVAL OF THE UNDERTAKING**

**Table 2** contains a list of referral agencies, responses received to date and possible permits required for the project, most of which are already in progress.

**Table 2: Referral Agencies, Responses and Possible Permits Required**

<b>Department/Regulatory Agency</b>	<b>Status</b>	<b>Possible Required Approvals/Permits</b>
Works, Services & Transportation	Approved	
Tourism, Culture, Industry and Innovation -Tourism	Approved	
Tourism, Culture, Industry and Innovation -Provincial Parks	Approved	
Tourism, Culture, Industry and Innovation -Historic Resources	Approved	
Government Service Center (Service NL) (Labrador City)	Conditional Approval	Vegetation screen to be maintained to restrict view from Highway
Fisheries and Land Resources -Crown Lands	Approved	
Fisheries and Land Resources -Agriculture	Approved	
Fisheries and Land Resources -Fisheries and Aquaculture	Approved	
Fisheries and Land Resources -Natural Areas	Approved	
Fisheries and Land Resources -Wildlife	Conditional Approval	
Fisheries and Land Resources -Forestry Resources & Agrifoods	Approved	Operating permit Commercial cutting permit
Fisheries and Land Resources -Land Management	Approved	
Municipal Affairs and Environment -Water Resources Management Division	Conditional Approval	
Municipal Affairs and Environment -Environmental Assessment Division	Project Registration Required	Environmental assessment registration
Municipal Affairs and Environment -Provincial Planning	Approved	
Natural Resources - DNR (Lands Division) -Quarry Materials	Approved	Quarry permit
Town of Labrador City	Conditional Approval	Zoned as Mining Reserve - Quarrying permitted

## 6.0 SCHEDULE

The proposed schedule for this project is as follows:

Submission of Registration Document:	August 2020
Review of Submission Document by Government:	September/October 2020
Commencement of Construction and Operations	Fall 2020 or Spring 2021

## 7.0 FUNDING

Funding for the construction and operation of the project will be provided entirely by the proponent.

## 8.0 LIMITATIONS

This environmental registration document was prepared by NCD Consulting Ltd. in consultation with Allard Distributing Ltd. for their use under the terms defined in a written contract between the two parties. The information included in this document was provided by the client and relates to the scope of this project exclusively. NCD Consulting Ltd. has worked with the client and utilized NCD's combined knowledge in quarry development and potential environment related concerns to, as accurately as possible and with the information available, layout the development of the site. Allard Distributing Inc. is ultimately responsible for executing the commitments made in this document.



Name: Mr. Gilles Allard

Position: President,  
Allard Distributing Ltd.

Aug 26/2020

Date