

PENNEY PAVING LIMITED BADGER CHUTE QUARRY PERMIT

Environmental Assessment Registration Document

Submitted by:

Penney Paving Limited

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Grand Falls – Windsor, NL

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Prepared with the assistance of:

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December 07, 2023

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1.0 NAME OF UNDERTAKING

Badger Chute Quarry Permit Application

- Quarry Permit Identification
 - File 711:13168 covering 10 ha

2.0 PROPONENT

2.1 Name of Corporate Body

Penney Paving Limited

2.2 Address

14 Duggan Street, P.O Box 806
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2.3 Chief Executive Officer

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3.0 THE UNDERTAKING

3.1 Nature of the Undertaking

The proposed project, referred to as the Badger Chute Quarry, is a 10 ha quarry permit application area (File #711:13168) located ~ 5 km southeast of the Town of Badger. Penney Paving Limited (Penney Paving) proposes that the quarry will be developed under a quarry permit, for producing aggregate products for use in the construction industry within the Badger, Grand Falls-Windsor, and Bishop's Falls areas.

3.2 Purpose/Rationale/Requirement for the Undertaking

The main purpose/rationale of this project is to produce aggregate products including, but not limited to Class A, Class B, winter sand, concrete aggregate, and asphalt aggregate for the intent of supplying Penney Paving's contractual requirements for various construction contracts within Central Newfoundland.

Penney Paving's current operating quarry in the area, referred to as the Aspen Brook quarry (File #711:120228, **Figure 3**), is set for a full site closure by 2027 once the remaining target material has been exhausted. As such, the Badger Chute quarry permit holds significant importance to Penney Paving, as it will provide the company with access to a local aggregate source in order to continue supplying construction materials to projects in the region. This new quarry site will replace the existing Aspen Brook quarry and both will be operational until the Aspen Brook site is fully rehabilitated by 2027, if not sooner.

There is established access to the quarry area via the existing truck drivable roads which branch from the Trans-Canada Highway (Route 1) and run south-southwest providing access to Penney Paving's Badger Chute quarry as well as the multiple other operating quarries in the immediate area. Quarry access is discussed in detail in **Section 4.3.1**.

4.0 DESCRIPTION OF THE UNDERTAKING

4.1 Geographic Location

The quarry application area is located in the Exploits District of Central Newfoundland on NTS map sheet 2D/13 (**Figure 1**), ~ 5 km directly southeast of the Town of Badger (~6.2 km via the Trans-Canada Highway, **Figure 2**). Access to the quarry site is gained via an existing ~ 2.2 km long truck drivable road which branches from the Trans-Canada Highway (Route 1) and travels south-southwest to the quarry area. A 450 m long access route has been proposed (**Figures 3 and 4**) to reach the quarry permit area from the main access road (**Section 4.3.1**).

No waterbodies or watercourses are located near the project boundary, with the Exploits River sitting over 550 m to the south-southwest (**Figure 3**). The quarry boundary area is not located within a Municipal Planning Area, Municipal Boundary, Protected Road, or any other legislated land use under the Urban and Rural Planning Act.

The quarry boundary sits within a Land Grant (Folio #105 / Volume #TL2) held by Exploits River Lumber & Pulp Co. (Exploits Lumber), as do the other five operational quarries in the immediate area. No conflicts with the Exploits Lumber Land Grant are foreseen due to the fact that all merchantable timber was cleared from the area between 2020 and 2021 by a commercial harvester, under a commercial cutting permit, within a Silviculture Zone held by the Department of Fisheries, Forestry and Agriculture (**Section 4.3.2, Figures 3 and 4**). Furthermore, the small 10 ha size of the quarry permit area is minuscule compared to the ~ 11,000 ha land grant area. The quarry also lies within a Newfoundland Hydro and Newfoundland Power distribution area.

The Badger Chute quarry, along with three neighboring approved and operating quarries (**Figure 3**) are located within a 992 ha Mineral License (035233M) held by Shawn A. Ryan. As such, no access to the permit area will be denied to the mineral rights holder for any planned mineral exploration work, as discussed in **Section 4.5**.

As the project is within a noted nesting bird and caribou habitat zone, all necessary precautions will be adhered to as per the Government of Newfoundland and Labrador Wildlife Divisions legislative requirements and the Wildlife Act.

The impact of the quarry on the human receptors near the project will be very minimal in nature, as the closest receptor to the project is a Crown Title (# 98373) held by Badger Forest Products, which is located over 1.7 km to the north. The Town of Badger and Riverfront Chalets, a privately owned lodging business, are both located over 5 km to the west and the east respectively. A further 10 Crown Title areas sit between 2 km and 5 km from the permit boundary, as shown on **Figure 5**.

4.2 Physical Features

4.2.1 Project Site Description

The 10 ha quarry permit application area is situated near 5 currently approved/operational quarries. These include KDJ Enterprises quarry (File # 711:10884 / Permit #148283) Hunt's Concrete quarry (File # 711:9933 / Permit #147117) and Exploits Valley Paving quarry (File # 711:40181 / Permit #147973) which all sit immediately to the east. Penney Paving's Aspen Brook quarry (File #8790 / Lease # 120228) and Hunt's Concrete quarry (File # 711:2678 / Permit #146020), are situated ~ 2.3 km further to the east (**Figure 3**).

The quarry area is located over 550 m north-northeast of the Exploits River, at the plateaued crest of a heavily forested hillside, which rises between 30 m and 45 m from the banks of the river to the plateaued hilltop. A Newfoundland Hydro transmission line

held under Crown Title #153602, which includes the required 30 m wide easement to the transmission towers centerline, sits ~ 20 m southwest of the permit area boundary. This allows Penney Paving to easily maintain the additional 15 m buffer area to the transmission line easement as required by the Department of Industry, Energy and Technology (DIET), as shown on **Figure 4**.

4.2.2 Site Visibility

Elevations within the permit boundary range from ~ 120 m – 122 m elevation. As the banks of the Exploits River lie between 77 m and 90 m in elevation, the sight lines from the river towards the quarry site are obscured by over 550 m of heavily forested hillside which rises between 30 m and 45 m vertically from the banks.

Visibility of the site from the river is not expected to be an issue, much like the other approved quarry permit areas directly next to Penney Paving's permit application area. A generalized example of the hillside obscuring the sightline from the Exploits River is presented on **Figure 6**.

The permit area lies between 1 km and 2 km south-southwest of the Trans-Canada Highway, with the land between the quarry permit area and the highway being heavily forested, completely obscuring the site from view. Furthermore, visibility of the site will be no greater than the other 3 approved quarry sites adjacent to the permit area boundaries (**Figures 3 and 4**).

4.2.3 Existing Biophysical Environment

The proposed quarry is located within the *Northcentral Subregion* of the *Central Newfoundland Forest Ecoregion*. It is the most continental part of the island in terms of its biophysical environment. This region has higher summer maximum temperatures and lower rainfall than other portions of Newfoundland with the mean annual precipitation ranging from 1000 mm to 1300 mm. The mean annual temperature is around 4.5°C, with a mean summer temperature of 12.5°C and a mean winter temperature of -3.5°C. Night frost can occur in summer months due to the warm summer daytimes and high evapo-transpiration losses. The higher elevations are rugged and rocky, while lower lying areas have a rolling terrain.

The rolling to undulating topography is characterized by shallow, medium quality till with soil texture ranging from sandy loam to loam. Balsam fir and black spruce are the most prominent tree species in the moist upland slopes while paper birch and aspen commonly grow in the lowlands on disturbed sites. Some areas lack good forest growth due to exposure to winds and poor soil conditions. Kalmia heath and lichens are found on drier sites. Black bear, caribou, moose, lynx, coyote and red fox are typical types of wildlife in the region.

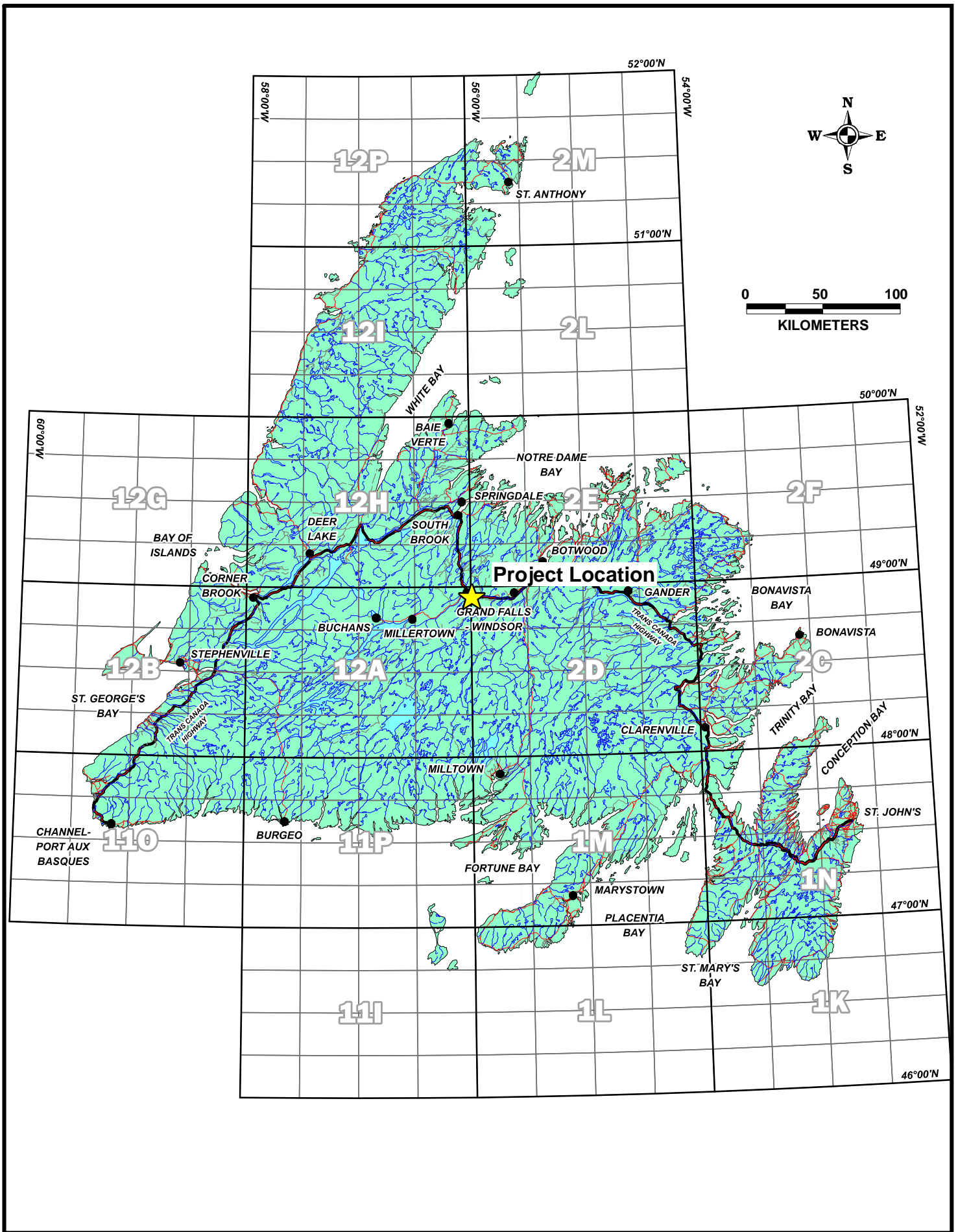


Figure 1: Project Location Map (NTS 2D/13)



Figure 2: General Quarry Area Map

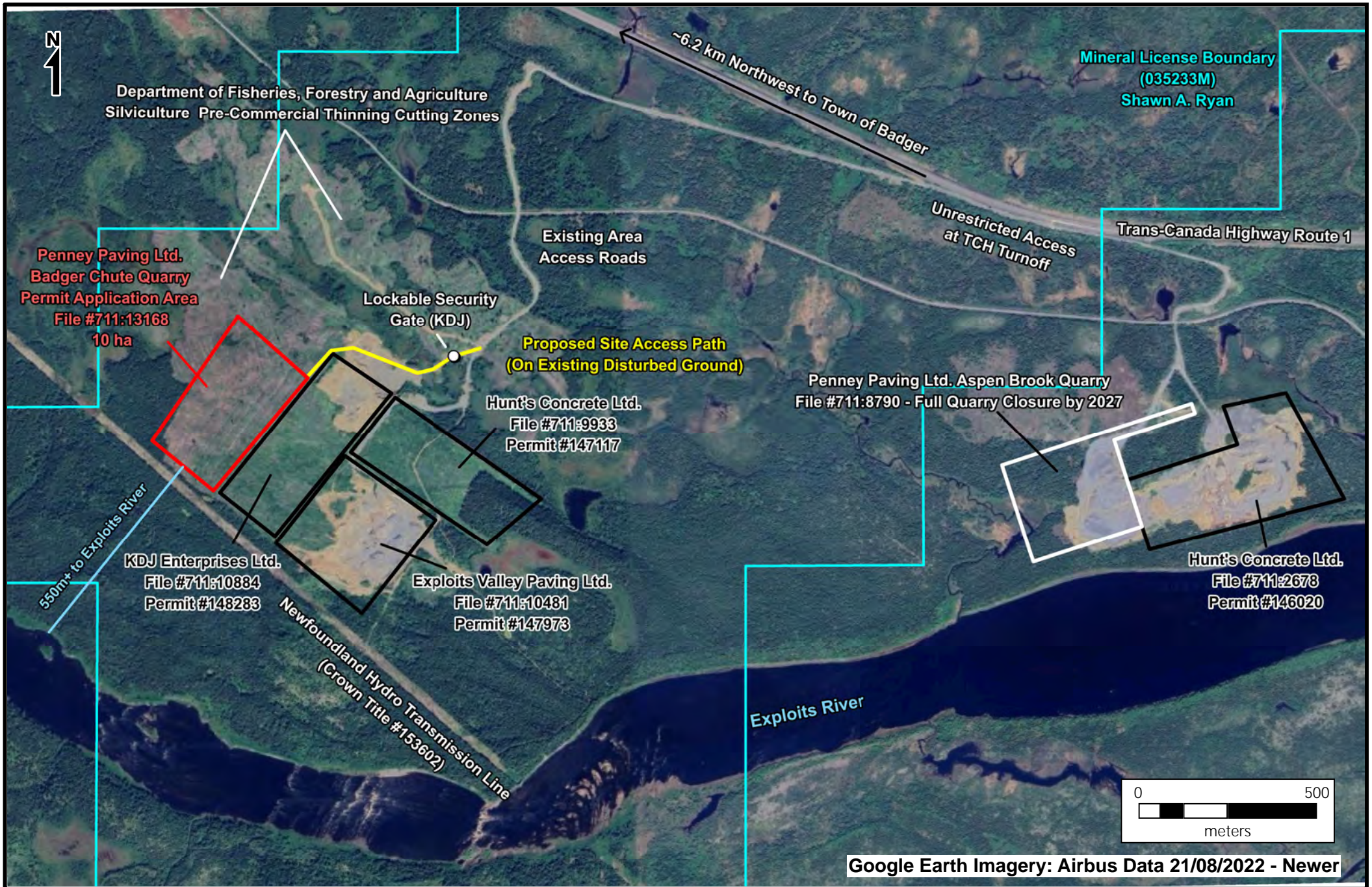


Figure 3: Quarry Permit Location Map

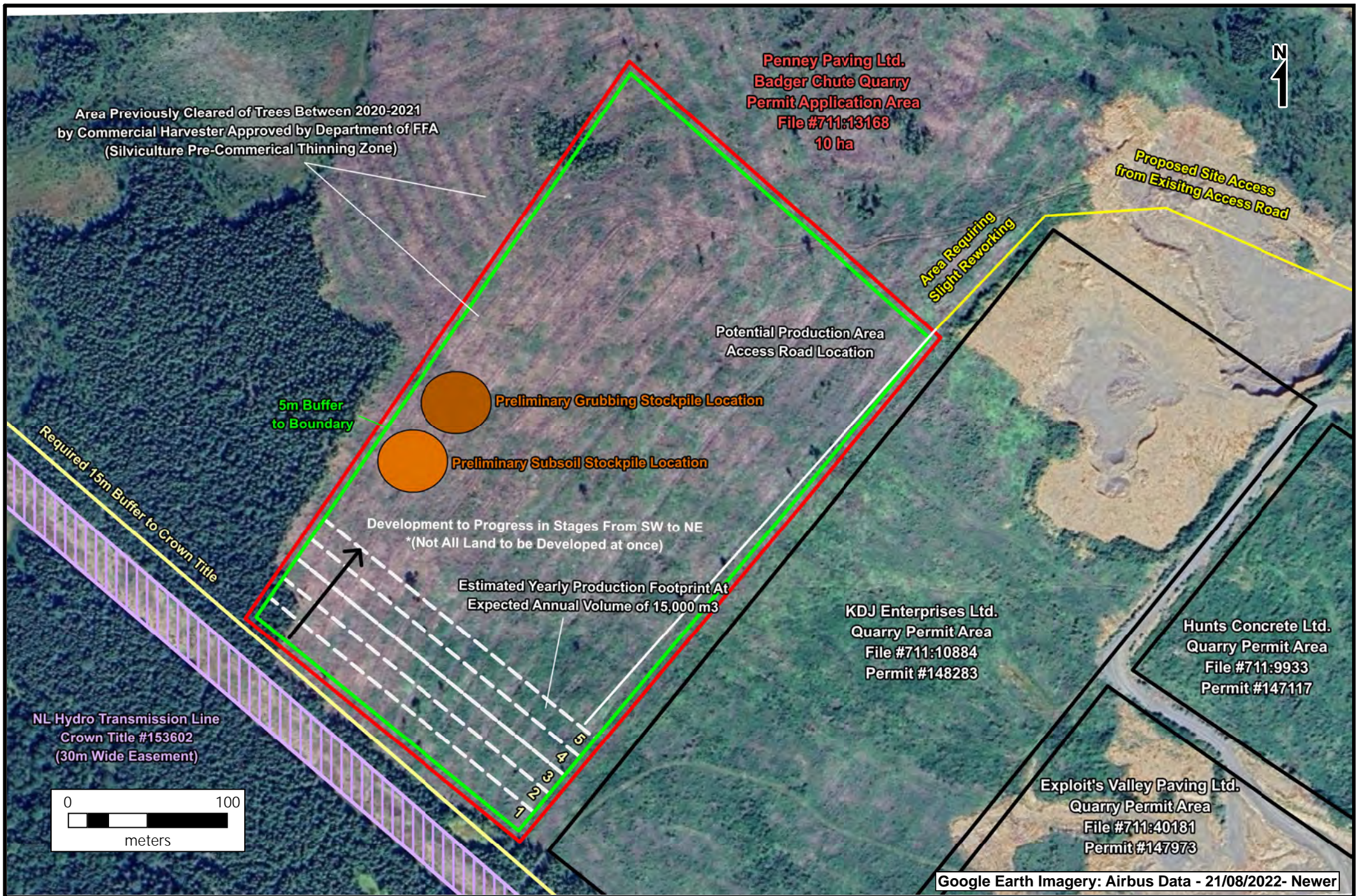


Figure 4: Detailed Quarry Permit Map

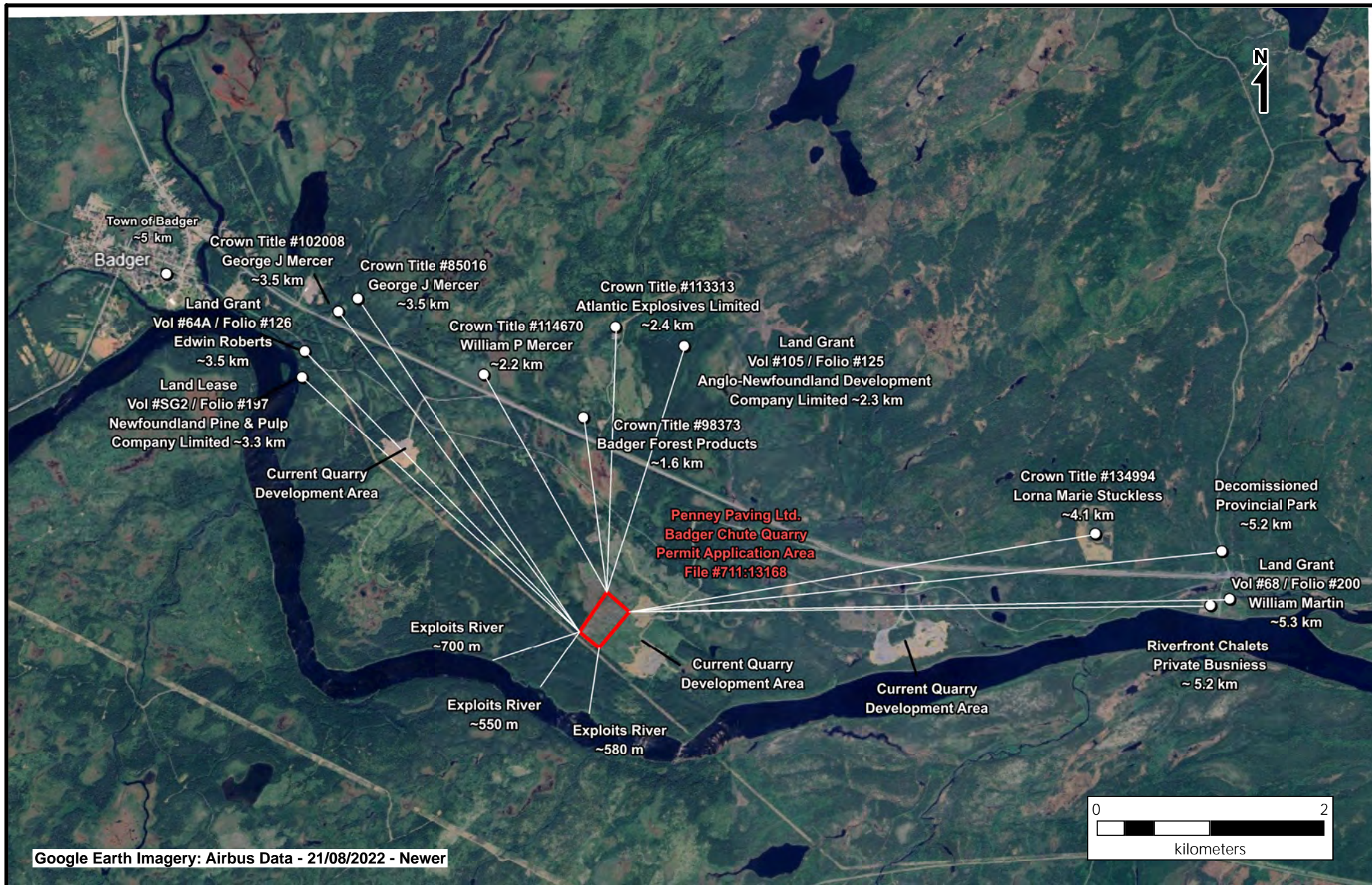


Figure 5: Receptor Location Map

Google Earth Image - Banks of Exploits River Southwest of Quarry Permit Boundaries, Looking East

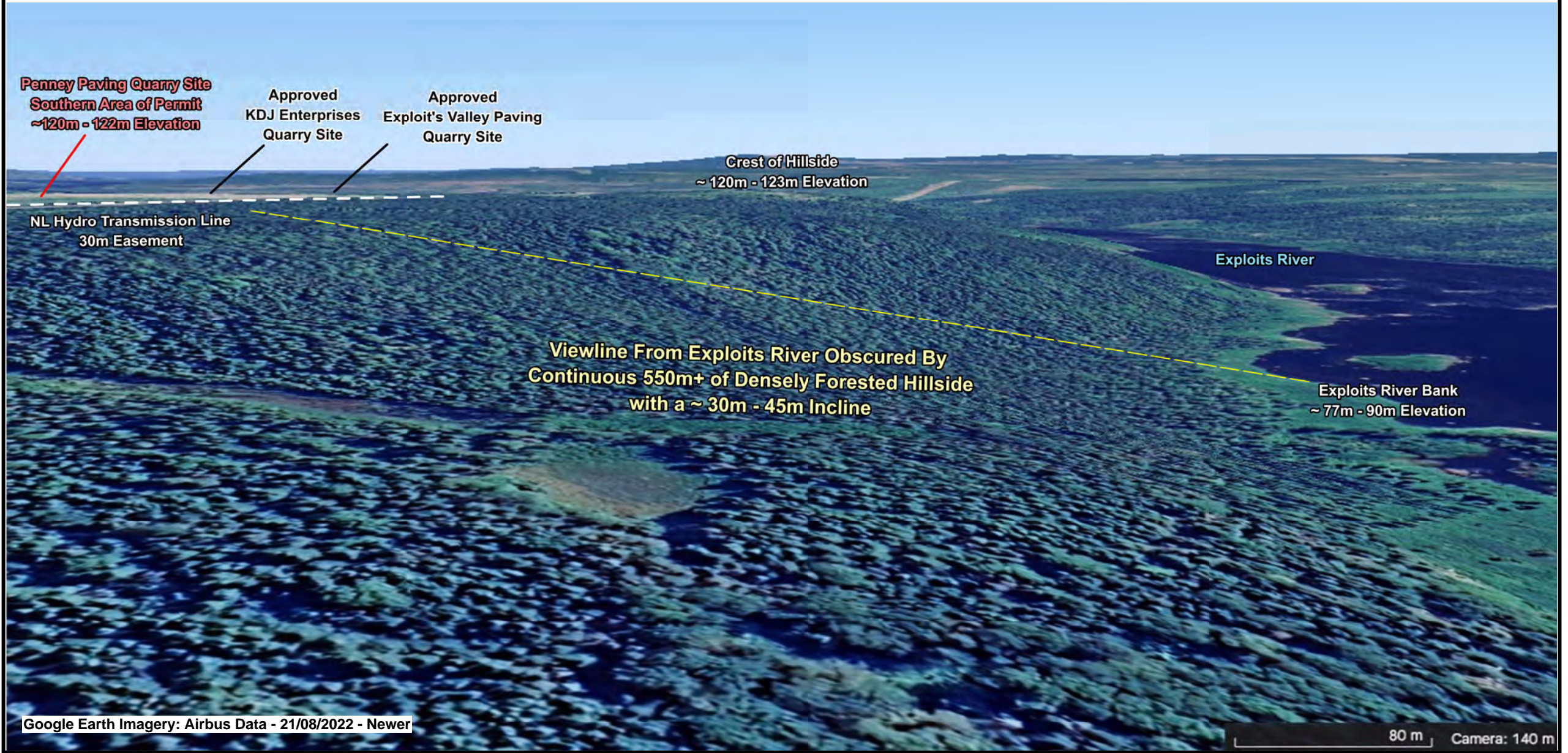


Figure 6: Site Visibility Depiction

4.3 Construction and Operation

The construction aspect of the proposed project will consist of clearing the site of grubbing/organics/mineral soil before proceeding to remove any sand/gravel resource material. All material with a high organic content (topsoil/grubbing) removed during construction/production of the quarry permit area will be preserved and stockpiled for future reclamation work. Underlying surficial/mineral soils will also be stockpiled, albeit separately from the organic material, for later rehabilitation of the site. Any overlying coarser aggregate material that will be removed during construction/production operations will be stockpiled and used at a later date, possibly as winter maintenance sand or other end uses as required.

The development operations of this quarry will generally advance towards the northeast, starting in the southwest and progressing away from the southwestern permit boundary towards the quarry entrance as indicated on **Figure 4**. Each of the depicted production areas (dotted grey polygons, **Figure 4**) show the estimated footprint for annual production of the site at the anticipated yearly extraction volume of 15,000 m³. At the time of drafting this report, Penney Paving has determined that their yearly rate represents a realistic volume to meet their current business demands. However, this volume is to be considered a preliminary estimate and may be altered when the production plan design is finalized upon the projects anticipated release from environmental assessment. Processing on site will only consist of crushing and screening of the extracted material (see **Section 4.3.3**). No washing of materials or other secondary product processing will take place on site.

4.3.1 Site Access

A 450 m long access route has been proposed (**Figures 3 and 4**) to reach the quarry permit area from the main access road that sits on ground that has already been disturbed from neighbouring quarry activities. A small (~120 m) portion of the proposed site access route near the quarry entrance may require some reworking of the disturbed ground with some placement of unconsolidated material to level out the quarry entrance (**Figure 4**). As per the required conditions of the approval of this access route from the Department of Transportation and Infrastructure, Penney Paving will ensure that Truck Turning signs will be in place at the TCH turnoff prior to its use. If signage installation by Penney Paving is required, a permit to work from the Bishop's Falls Depot will be acquired by Penney Paving prior to construction.

Access to the site is secured via the lockable gate installed by KDJ Enterprises Ltd. (KDJ) at the turn off point for their quarry permit area (File # 711:10884 / Permit #148283), which neighbors Penney Paving's permit directly to the east (**Figure 3**). Penney Paving will utilize this lockable gate with written permission from KDJ, which will be obtained prior to

any construction or development within the permit area and this approval will be included in the quarry lease plans

Public access to the general area via the existing roads will not be restricted from the Trans-Canada Highway. Access will only be restricted at the security gate adjacent to the quarry area boundary in order to maintain local access for wood cutting and other recreational activities by the general public.

4.3.2 Site Clearing

The quarry is located within a Silviculture Pre-Commercial Thinning Zone held by the Department of Fisheries, Forestry and Agriculture. Currently the entire quarry permit area has already been cleared of trees and merchantable timber except for a very small area in the Southwest corner. Thus, there is no anticipated conflict with previous forestry work. If additional tree cutting is deemed necessary to clear the southwest corner, it will be done by either handheld chainsaw and will be garnered under a commercial cutting permit issued by the Department of Fisheries, Forestry and Agriculture.

Grubbing/overlying organics will be stripped and preserved on site within designated stockpile areas. While the organic material layer within the area is noted to be quite thin, Penney Paving will preserve this material separately from non-organic bearing subsoils to the best of their ability. Surficial soils and subsoils will be stripped and windrowed to the permit boundary within the 5 m buffer area depicted on **Figure 4**. All stripped organics and additional surficial soil material will be preserved within separate stockpiles on site for future reclamation of the quarry. The stockpile locations presented on **Figure 4** are preliminary in nature and the actual stockpile locations may be adjusted during the construction/production stages within the quarry in order to provide the most efficient flow of development.

The clearing of grubbing and surficial soils will happen in yearly phases and not all at once, as dictated by development and demand. This will be done in order to minimize disturbances of the land within the quarry area and the overall disturbed footprint at any given time and allowing for regrowth within exhausted areas (**Figure 4**).

4.3.3 Quarry Development and Operation

The construction aspect of this project will be carried out across the 10 ha area in yearly phases, with the work consisting of clearing the site of grubbing while removing and stockpiling the organics (as mentioned in **Section 4.3.2**). A slight reworking/addition of material for the quarry entrance area may be carried out (**Section 4.3.1**) and will be completed by utilizing an excavator to rework the ground and/or place material. Any potential additional material needed for the access road will likely be sourced from Penney Paving's nearby Aspen Brook quarry in the area (File #8790 / Lease # 120228) as shown on **Figure 3**. If other factors hinder the supply of this material, it may also be

trucked in from other approved quarry sites in the surrounding area. For a list of all personnel/equipment required for construction/operation of the quarry see **Section 4.6**.

Operational activities will consist of removing the sand and/or gravel material by heavy equipment, which will then be crushed and screened as required, and stockpiled on site. Processing activities will include the use of a excavators and/or front-end loaders to transfer material into the crusher/screener and possibly haul trucks to then transport the crushed/screened material to the designated stockpile area. The crusher/screener will be mobile in nature and will be readily moved as required to facilitate a more productive processing setup. The use of water for washing of materials and additional secondary processing of product materials will not be required.

All extraction activities will adhere to the Government of Newfoundland and Labrador's Occupational Health and Safety Regulations under the Occupational Health and Safety Act, including maintaining a maximum quarry face height of 5 m. No blasting of any bedrock will take place within the quarry. The phase block footprints depicted on **Figure 4** are strictly preliminary in nature and are only shown as a potential indication of the production area developed per year.

With the anticipated approval times and the anticipated release from EA review, typical quarrying activities are slated to take place as soon as spring weather conditions permit within the quarry area subsequent to final approval from the Department of Industry, Energy and Technology. This is around May of 2024 but will ultimately be dictated by the timing of approval, material demand and the ground conditions during the spring thaw.

4.4 Potential Sources of Pollution During Construction and Operation

The construction and operational phases of the development will utilize equipment such as front-end loaders, excavators, and dump trucks. This equipment and related activities represent a potential source of noise disturbance, exhaust emissions, the potential release of petroleum hydrocarbons, dust, domestic waste, and general refuse.

4.4.1 Air

Air pollution will be controlled by having all equipment on site fitted with the appropriate emission-control equipment. Site clearing will be completed in phases, with only areas required for production cleared, reducing the overall potential of excessive dust and pollution impacts. Thus, the entire 10 ha will not be stripped of its organic cover initially. Dust created by equipment operation along roads will be kept at a minimum by the watering of roads as required. All activities within the quarry will be conducted in a manner that respects the province's *Air pollution Control Regulations (2004)*.

4.4.2 Noise and Vibration

The extraction and processing operations of the quarry site are not anticipated to have an effect on nearby receptors any more than the active adjacent quarry operations in the area. All equipment will be kept in good operating order to ensure that maximum manufacture decibel levels produced are not exceeded. Workers will have the proper hearing protection and the work site will be a controlled work environment.

4.4.3 Domestic Waste and Sewage

During the quarry construction phases, portable lavatories will be located within the proposed quarry boundaries and will be utilized as required. Once regular quarry production operations begin, the portable lavatories may still be used, or employees may utilize other facilities within the Town of Badger or other nearby communities. Domestic waste generated during construction and general operations will be collected and disposed of in accordance with the Environmental Protection Act 2002. Waste and sewage will be removed by approved service providers.

4.4.4 Fuel

Diesel fuel will be required to operate the development and processing equipment that will be located within the quarry area. Fuel may be supplied through petroleum storage tanks and/or a mobile fuel truck from Penney Paving's other nearby quarry site.

In the event that a petroleum fuel storage tank will be placed on site, all required permitting including the Registration of Gasoline and Associated Products and a Mobile Fuel Storage Tank Permit will be acquired from the Government Service Branch – Operations Division of the Government of Newfoundland & Labrador. Any potential fuel storage tanks will also comply with the required Storage Tank System Test from Service NL. The handling of petroleum products on site will comply with the Storage and Handling of Gasoline and Associated Products Regulations. All fuel stored on site will be placed in a spill tray that would exceed the capacity of the storage unit placed within it.

Fuel storage areas will be regularly checked, and emergency spill kits will be available on site at all times for containment and cleanup of any hydrocarbon leaks. All equipment will be kept in good operating order with regular inspections in an effort to proactively prevent spill incidents and identify leaks. Any leaks or spills in excess of 70 liters will be immediately reported to the Provincial Environmental Emergency Telephone Line and cleaned up.

4.4.5 Effluent

There is a potential for erosion and the transport of fine-grained particles during construction activities in relation to clearing of the land. This will be monitored on a

constant basis during construction while clearing takes place and, if required, appropriate mitigating measures in line with industry best management practices will be utilized.

The first step will be to create erosion control ditches with check dams, hay bales, and silt fencing to filter water leaving the site. Site runoff will then be directed towards vegetated areas that will act as an additional filter for fine particles. Gradual phased development of the site will ensure that the organic layer will not be stripped all at once for the entire site, and this will reduce the amount of mineral soil exposed thus reducing the overall impact of erosion.

The same process will be applied for the operational phases of the project. Site runoff will be directed to various vegetated areas depending on what stage of development is occurring. If required, as a larger footprint is developed and/or progressive reclamation is in progress, a small shallow depression may be constructed to temporarily hold water within the quarry. This will allow for suspended sediment to deposit prior to water being released into vegetated areas along ditches with check dams, hay bales and silt fencing. All water released into the environment will meet the regulatory requirements of the *Environmental Control Water and Sewage Regulations (2003)* as well as provincial permits.

4.5 Potential Resource Conflicts During Construction and Operation

Potential resource conflicts during construction and operation of the quarry could include the following: mineral exploration work by Shawn A. Ryan (mineral rights holder – 035233M), encounters with wildlife, the use of the area for recreational purposes such as river based aquatic activities (rafting, swimming etc....), ATV riding, hiking, berry harvesting, and wood cutting.

As noted in **Section 4.1**, Penney Paving's quarry permit as well as the Hunt's Concrete, KDJ Enterprises and Exploits Valley Paving quarries, are located within a 992 ha Mineral License (035233M) held by Shawn A. Ryan. As such, no access to the permit area will be denied to the mineral rights holder for any planned mineral exploration work.

Penney Paving commits to working with Shawn A. Ryan to provide unrestricted access and the ability to perform any required mineral exploration activities within the quarry permit area should the need arise. While no issues are expected to arise from this understanding, Penney Paving commits to having open communication with Shawn A. Ryan in the event any plans for exploration work within the boundary area are brought forth. Penney Paving also commits to providing Shawn A. Ryan with a safe and controlled work environment should mineral exploration work take place within the quarry.

Any encounter with wildlife shall follow regulations stated in the Wildlife Regulations under the *Wildlife Act (CC. 96-809)* and legislative requirements for an area known to host nesting birds and caribou habitation. The current and historic quarrying activity throughout

the general area is expected to limit wildlife interaction including recreational activities such as hunting in favor of less developed areas further north in the region.

The quarry area sits within a land grant held by Exploits River Lumber & Pulp Co. (Folio #105 / Volume #TL2). The immediate use of the land for wood cutting by Exploits Lumber is not anticipated to occur, as all merchantable timber within the quarry permit area boundary has been previously cleared by a commercial harvester between 2020 and 2021 under a commercial cutting permit issued by the Department of Fisheries, Forestry and Agriculture. Additionally, the quarry permit area encompasses just 10 ha of the overall ~11,000 ha grant area.

As discussed in **Section 4.2.2**, the sight lines from the Exploits River, towards the quarry site, are obscured by over 550 m of heavily forested hillside which rises between 30 m and 45 m vertically from the banks. Therefore, no disturbances or visual impacts on the recreational use of the river are expected to be created by the quarry.

While locals within the area utilize the existing forestry roads for hiking, ATV riding and other recreational activities, the construction and operation of this quarry area is not expected to cause any conflicts for local land use. This is due to access only being restricted adjacent to the KDJ Enterprises and Penney Paving quarry permit boundaries (**Figure 3**), allowing for unimpeded access to the board area from the TCH. Furthermore, the abundant quarrying activities within the area will generally limit the likelihood of the general public using the area for recreational activities in favor of nearby undeveloped areas surrounding the quarry area and on the north side of the highway.

- Within the proposed quarry area, a 5 m wide buffer will be left intact where no resources will be excavated alongside all permit boundaries. Berms constructed from the windrowed mineral soils and subsoils will be placed within the 5 m buffer area.
- The pit floor will be kept lower than the perimeter berms, where present, as development progresses so as to contain precipitation water within the quarry site and contain any suspended solids to within the quarry area.
- Precipitation water for the entire site will be controlled at exit points using the mitigation measures previously mentioned in **Section 4.4.5**. Also, the permeable nature of the sand and gravel will allow for some filtration of site water to the subsurface within the quarry permit.

4.6 Occupation

The occupations required for the proponent's site are listed below and classified as per the National Occupational Classification (2016)

Construction

- 1 Quarry Supervisor (8221)
- 3 Heavy Equipment Operators –Excavator/Dump Truck (7521)

Operation

- 1 Quarry Supervisor (8221)
- 1-2 Heavy Equipment Operator – Loader/Excavator (7521)
- 1 Heavy Equipment Operator – Crusher/Screenner (7521)
- 2-3 Heavy Equipment Operators – Tandem or Semi Dump Trailers (7521)

The operation of the quarry will require up to 7 employees to run at the anticipated production rate of ~ 15,000 m³ annually, although fluctuations in material demand may lead to a change in the number of required employees and annual production.

4.7 Reclamation and Closure

The project will be rehabilitated as per the conditions of a quarry permit issued by the Department of Industry, Energy and Technology. All subsoils and mineral soils that have been windrowed within the 5 m buffer area and/or stockpiled on site during the quarry construction and production (**Figure 4**) will be used to slope all exposed 5 m quarry faces to 30 – degrees. Grubbing and organics that have been stripped and separately preserved on site will be re-spread in an even layer across all disturbed areas to promote natural revegetation, including the sloped areas created from subsoils.

As the quarry sits on completely undeveloped ground, all organic and subsoil material within the quarry permit boundaries can be appropriately preserved for rehabilitation. The undeveloped nature of the permit area indicates that sufficient subsoil material will likely be available to complete rehabilitation of the site. Additional grubbing/organic bearing material may be imported to the site in order to complete an evenly spread layer of reclamation material, if deemed necessary. Alternatively, the planting of nitrogen fixing plants such as lupins or tree seedlings may be utilized to complete site rehabilitation.

5.0 SCHEDULE

The proposed schedule for this project is as follows:

Submission of Registration Document	December 2023
Review of Submission Document by Government	February 2024
Commencement of Construction and Operations	May 2024

6.0 APPROVAL OF THE UNDERTAKING

Table 1 contains a list of referral agencies, responses received, and possible permits required for the project, some of which are already in progress.

Table 1: Referral Agencies, Responses and Possible Permits Required

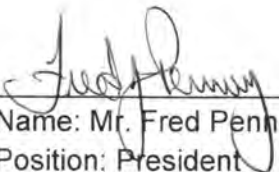
Department/Regulatory Agency	Status	Possible Required Approvals/Permits
Newfoundland Hydro	Conditional Approval	
Newfoundland Power	Approved	
Municipal Affairs and Environment - Land Use Planning	Approved	
Municipal Affairs and Environment - Water Resources Management Division	Conditional Approval	
Municipal Affairs and Environment - Environmental Assessment Division	Project Registration Required	Environmental Assessment Registration
Industry, Energy and Technology - Electricity and Alternative Energy Division	Approved	
Industry, Energy and Technology - Mineral Lands Division	Conditional Review	Quarry Permit & Visibility Management Review
Tourism, Culture, Arts and Recreation - Archeology	Approved	
Tourism, Culture, Arts and Recreation - Parks	Approved	
Tourism, Culture, Arts and Recreation - Product Development	Approved	
Service NL	Conditional Approval	
Transportation and Infrastructure	Approved (existing access to site)	Truck Turning Signage
Department of Fisheries and Oceans Canada	No Response	
Fisheries, Forestry and Agriculture - Forestry	Approved	Operating Permit & Cutting Permit (If Required)
Fisheries, Forestry and Agriculture - Crown Lands	Approved	
Fisheries, Forestry and Agriculture - Land Management	Approved	
Fisheries, Forestry and Agriculture - Wildlife	Conditional Approval	
NAV Canada – Land Use Office	Approved	

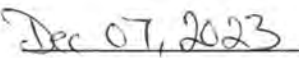
7.0 FUNDING

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 Penney Paving Limited 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 extensive 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 in a safe and environmentally sustainable manner.


Name: Mr. Fred Penney
Position: President
Penney Paving Limited


Date