

Date: February 13, 2026

To:
Minister of Environment and Climate Change
Government of Newfoundland and Labrador
P.O. Box 8700
St. John's, NL A1B 4J6
Attention: Director of Environmental Assessment

Re: Environmental Assessment Registration – Shingle Recycling Facility

Dear Minister,

On behalf of Black Rock Construction Group, I am pleased to submit the enclosed Environmental Assessment (EA) Registration document for our proposed Shingle Recycling Facility located at 49 Horizon Drive, Holyrood, NL.

This project represents Newfoundland and Labrador's first dedicated asphalt shingle recycling facility, with the primary purpose of diverting shingle waste from landfills and processing it into Recycled Asphalt Pavement (RAP). The initiative aligns with provincial priorities for waste reduction, greenhouse gas reduction, and green industry development.

The undertaking has been designed to operate in full compliance with provincial environmental protection standards. Our project will create new green jobs, extend the lifespan of local landfills, and reduce reliance on virgin asphalt.

In accordance with the Environmental Protection Act and the Environmental Assessment Regulations, please find attached the completed EA Registration document prepared in the format required by the Department.

Black Rock Construction Group is in good standing with the Registry of Companies.

We respectfully request that the Department proceed with the registration review and issue a decision under the Environmental Assessment Act at the earliest opportunity. Should you or your staff require any additional information or supporting documentation, please do not hesitate to contact us.

Thank you for your consideration of this application.

Sincerely,

Neil Pittman

Neil Pittman
Director, Black Rock Construction Group

NAME OF UNDERTAKING: Avalon Shingle Recycling Facility

PROPONENT:

(i) Name of Corporate Body: **Black Rock Construction Group**

(ii) Chief Executive Officer:

Name: **Neil Pittman**

Official Title: **Director**

(iii) Principal Contact Person for purposes of environmental assessment:

Name: **Adrian Abbott**

Official Title: **Project Manager**

Proponent is in good standing with the Registry of Companies.

THE UNDERTAKING:

(i) Name of the Undertaking: **Avalon Shingle Recycling Facility**

(ii) Purpose/Rationale/Need for the Undertaking:

The purpose of the undertaking is to divert shingle waste from landfills to be repurposed into recycled asphalt pavement, cold patch asphalt, aggregates, and more. Currently, there are over 5,000 tons of shingle waste disposed of in landfills in Newfoundland each year, yet these shingles contain valuable minerals that can be reintegrated into construction operations.

Shingle recycling is on the rise across Canada as the technology and information are becoming more available, with Northstar Clean Technologies recently developing a new site in Calgary, Alberta after the success of their operation in Delta, BC. There are several other companies that are stated to recycle shingles including Gemaco Sales Ltd. and Intercity Recycle Ltd. in BC, Eccopave Inc. and Environmental Processors West Inc. in Alberta, Greensite Recycling and Penner Waste in Manitoba, BFI Waste Management and Sittler Environmental Inc. in Ontario, among others. There are currently no advertised shingle recycling operations in Atlantic Canada, which will put Newfoundland at the forefront of environmental leadership should the facility be approved.

The undertaking was previously assessed as **EA 2373 – St. John’s Shingle Recycling Facility** and was released from further assessment. A relocation is proposed to comply with land-use zoning procedures.

(i) GEOGRAPHICAL LOCATION

The intended site proposed to implement the asphalt shingle recycling facility is located at 49 Horizon Drive, Holyrood and has been cleared for industrial zoning. The site is situated within an established industrial area, in proximity to compatible industrial and commercial businesses, making it an ideal location for a shingle recycling facility.



Figure 1: Plot of land to be acquired.



Figure 2: Site image showing geographical coordinates.

The geographical coordinates of the site are 47°21'44"N 53°06'39"W. The proponent intends to

purchase one acre of land from this site, so the subdivision of the property may call for the exact address to change.

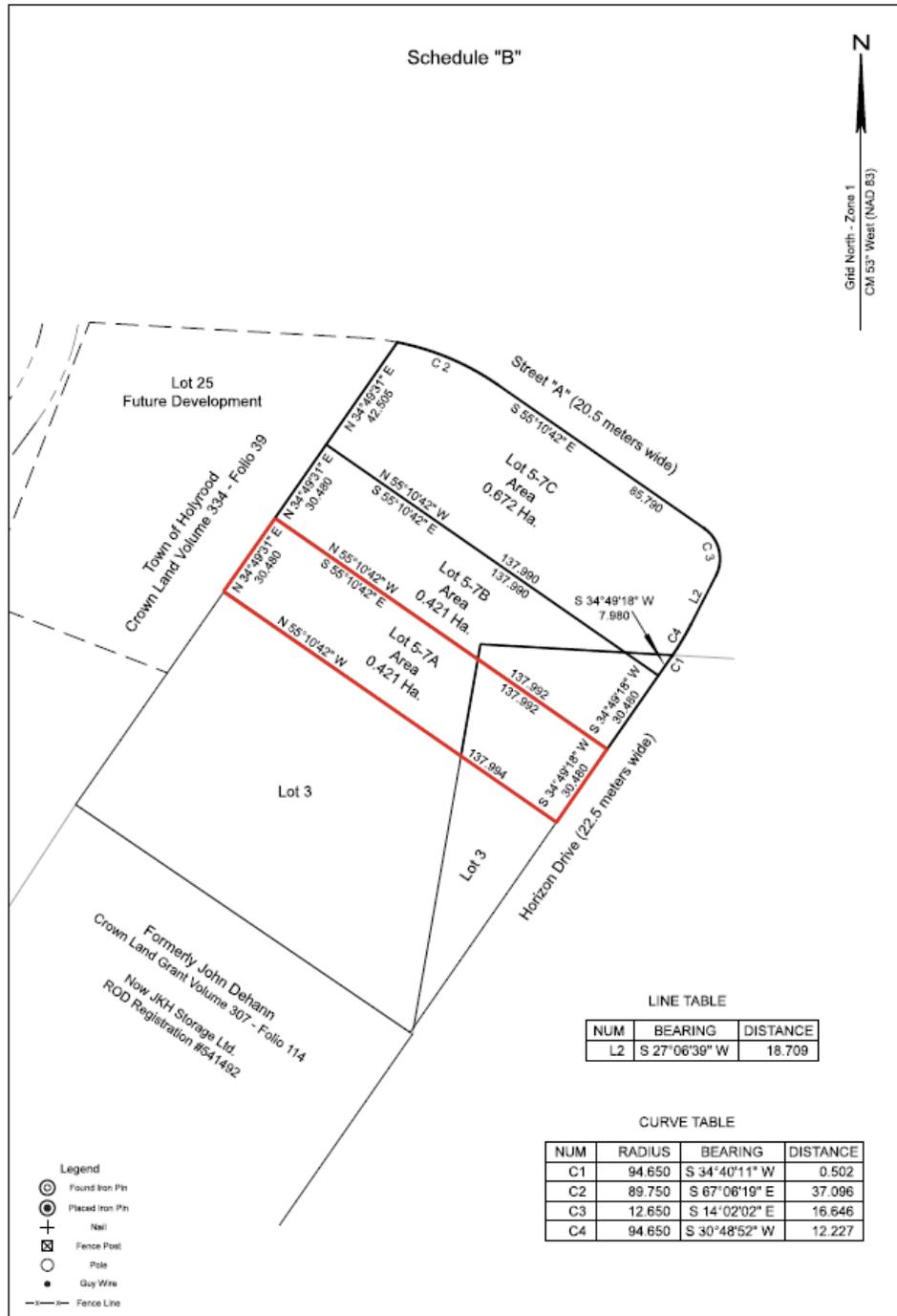


Figure 3: Land survey showing dimensions and angles. Lot 5-7A is the proposed site.

(ii) PHYSICAL FEATURES

The major physical features of the undertaking consist of the following:

- Rexworks Maxigrind 425 Horizontal Grinder
- Bagela BA10000 Asphalt Recycler
- Small Trailer Scale House
- Industrial Truck Scales
- Dump Bins
- Steel Building (Future Addition)

The size of land for the undertaking to be implemented is approximately 1 Acre, or one third of the lot shown in Figure 2. The vegetation within the lot will be trimmed and excavated and the land will be graded and paved with minimal effect on the environment. The topography will be mildly affected by levelling the area, and surrounding commercial businesses will be notified of the new operations. The concept plan shown in Figure 3 gives a general idea of the layout planned for the site.



Figure 4: Site concept plan.

(iii) CONSTRUCTION

The total construction period will span 6 months upon acquisition of the land and required permits. The plan will be conducted as follows:

- Month 1 – 2: Removal of vegetation, grading and paving.
- Month 3 – 4: Installation of fencing and power lines.
- Month 5 – 6: Mobilization of equipment, installation of scales and environmental protection systems.

Upon approval of permits and transfer of land ownership, physical construction on site is planned to commence by March 1st, 2026.

Potential pollutants during construction phases will be minimal. Exhaust emissions from a skid-steer, 5-ton excavator and heavy equipment will be present. However, no significant solid waste or liquid pollutants are anticipated during construction.

Some possible causes of resource conflicts during construction are:

1. Land Use Compatibility
 - i. Temporary disruption to adjacent industrial/commercial operations due to construction traffic, noise, or dust.
2. Traffic and Road Infrastructure
 - i. Increased heavy truck movements may temporarily impact municipal road capacity or road surface condition.
 - ii. Potential conflicts with commuter traffic.
3. Groundwater Resources
 - i. Although no domestic wells are identified nearby, excavation activities may alter surface drainage patterns.
4. Vegetation and Wildlife Habitat
 - i. Clearing activities may temporarily disturb migratory birds or small wildlife (if construction runs into summer months).
 - ii. Loss of minor vegetative cover.
5. Noise Environment
 - i. Temporary increase in noise levels during clearing, grading, and equipment mobilization.

6. Air Quality

- i. Dust emissions from grading and truck movement.
- ii. Diesel exhaust from heavy equipment.

The intended property for development at 49 Horizon Drive is located in an established industrial area. A review of available mapping and municipal records indicate that no domestic drinking water wells are located in the vicinity of the project footprint. However, the area proposed is not municipally serviced with water lines, so the site is to be supplied with water tanks for cleaning and fire protection measures. Should future operational requirements necessitate a non-domestic water supply, the proponent will install a well and septic tank as well as obtain all required water use licenses in accordance with provincial legislation prior to implementation.

(iv) OPERATION

The undertaking will provide a facility for contractors to dispose of shingles to be repurposed into clean recycled asphalt, which will reduce the amount of landfill waste from C&D operations while providing new material to be used in hot mix asphalt (improves pavement performance and reduces cracking), cold patch material (fills potholes and cracks), road aggregate for unpaved roads and more. The project will introduce Newfoundland contractors to greener solutions in the local construction industry and aims to influence cleaner practices in the trade.

Regular operations upon completion of the facility will consist of renting roll-off dump bins to roofing contractors for disposal of shingle waste, which will be mobilized to and from the site using hook-lift trucks. Bins with discarded shingles will then be brought to site and weighed at the scale house before being dropped near the horizontal grinder. An operator will then mulch the shingles using the grinder crane, with a magnet in place at the output to remove nails.

Following this, the ground shingle waste will be transferred to the asphalt recycler using a skid-steer to produce recycled hot mix asphalt, which can be used in new road construction jobs or various paving infrastructure. Future recycling methods will include cold patch production, extracting liquid asphalt, and recycling aggregate sands.

The facility will be capable of processing between 200–300 tons of shingle waste daily. If the facility receives 90% of discarded shingle waste on the Avalon Peninsula, grinder operation will only be necessary for approximately 30 days a year.

Some possible causes of resource conflicts during operation are:

1. Traffic & Transportation Network

- i. Ongoing truck traffic associated with bin transport and material sales may increase

wear on municipal roads.

- ii. Potential congestion near site entrance.
2. Air Quality
- i. Marginal risk of particulate emissions from shingle grinding.
 - ii. Diesel emissions from equipment.
3. Noise Environment
- i. Intermittent noise during grinding operations.
 - ii. Potential interaction with nearby commercial operators.
4. Soil & Land Quality
- i. Potential risk of marginal localized ground contamination associated with equipment leaks.
 - ii. Long-term surface hardening affecting drainage.
5. Waste Management System
- i. Rejection of contaminated shingle loads may require disposal at regional landfills, affecting landfill capacity.
6. Energy Use & Emissions
- i. Facility energy consumption contributing marginally to regional emissions.

(v) ENVIRONMENTAL PROTECTION MEASURES

Potential pollutants during everyday operations are minimal, with petroleum runoff and equipment leaks encompassing the main concerns. Mitigation procedures will be conducted regularly to ensure proper containment of pollutants, including but not limited to daily equipment and product inspections, maintaining covered storage and on-site spill kits, and upholding proper drainage routes for runoff.

(v)(i) ASBESTOS MANAGEMENT

The proponent acknowledges that asphalt shingles may contain asbestos, particularly in materials manufactured prior to regulatory phase-outs.

To address this risk, the following management strategies will be implemented:

- **Pre-acceptance controls:** Only asphalt shingles from approved sources will be accepted. Contractors delivering shingle waste to the facility will be required to declare that the shingles are asbestos-free. Loads suspected of containing non-compliant or prohibited materials will be rejected.
- **No burning of materials:** Under no circumstances will shingles or other debris be burned on site.
- **Mechanical processing only:** Shingle size reduction will be conducted using enclosed mechanical equipment designed to minimize airborne particulates.
- **Dust suppression measures:** Water misting and operational controls will be employed during processing as required.
- **Worker protection:** All operators will wear appropriate personal protective equipment (PPE), including respiratory protection where warranted.
- **Waste segregation and disposal:** Any material identified as unsuitable or potentially hazardous will be isolated and disposed of at a licensed facility in accordance with applicable regulations.

(v)(ii) ENVIRONMENTAL IMPACT MITIGATION

Some general mitigations for potential environmental impact are as follows:

1) Air Quality and Emissions

- Full compliance with provincial air pollution control regulations.
- No burning of prohibited or unauthorized materials on site.
- Routine inspection and maintenance of all diesel-powered equipment to ensure optimal fuel efficiency and reduced emissions.
- Use of dust suppression techniques (e.g., water application) during dry conditions.

2) Water Protection and Runoff Management

- Compliance with the Environmental Control Water and Sewage Regulations.
- Maintenance of positive drainage away from stockpiles and processing areas.
- Implementation of ditching, grading, or sediment controls where required to prevent off-site sediment transport.
- Secure storage of fuels and lubricants.
- Registration of fuel storage tanks as needed.

3) Vegetation and Wildlife Protection

- Avoidance of vegetation clearing during the migratory bird nesting season (May 15 –

August 15) wherever practicable.

- Establishment of vegetated buffers around raptor nests or other sensitive wildlife features if identified during site activities.
- Active management of material stockpiles to prevent nesting by ground-nesting species.

4) Material Sourcing and Site Management

- Quarry materials required for construction will be sourced exclusively from approved and licensed suppliers.
- Covered storage of raw and processed materials to reduce runoff and contamination risks, as needed.
- Inventory controls to prevent excessive accumulation of stockpiled materials.

5) Occupational Health and Safety

- Mandatory use of PPE, including high-visibility clothing, hearing protection, respiratory protection (as required), and protective footwear.
- Provision of emergency washing facilities on site.
- Implementation of lone-working procedures if required.
- Routine safety training and toolbox meetings for all site personnel.

6) Equipment and Energy Efficiency

- Operating heavy equipment in a manner that maximizes fuel efficiency and minimizes idling.
- Preventative maintenance programs to reduce leaks, breakdowns, and environmental risk.
- Spill response kits maintained on site, with trained personnel available.

7) Traffic and Community Considerations

- Scheduling of material deliveries and removals to minimize congestion.
- Coordination with municipal authorities regarding haul routes and operational hours.
- Communication with neighboring industrial operators as required.

(vi) OCCUPATIONS

The construction phase of this project will be completed by the employees of Black Rock Construction Group and its affiliated companies. An estimated 10–15 employees will be regularly assisting with the clearing of land and construction of the facility. Upon commencement

of operations, an average of 3–4 employees will be on site to manage consistent production.

Required occupations on site are:

- [1] Heavy Equipment Operator (73400) — To run machinery, excavators and skid-steer.
- [2] Construction Labourers (75110) — To upkeep cleanliness on site and assist contractors.
- [1] Receptionist (14101) — To check-in customers, log scale weights and process payments.
- [1] Construction Manager [On/Off Site] (70010) — Ensure operations remain profitable.

Black Rock Construction Group offers equal-opportunity employment to people of all genders and ethnicities. We positively encourage applications from suitably qualified and eligible candidates regardless of age, colour, disability, national origin, ancestry, race, religion, gender, sexual orientation, gender identity and/or expression, veteran status, genetic information, or any other status protected by applicable law.

(vii) APPROVAL OF THE UNDERTAKING:

Approval required for the undertaking:

- Asphalt Pavement Storage Area Application Form — Motor Registration Department (Provincial Government)
- Planning/Development Application Form — Planning, Engineering and Regulatory Services (Municipal Government)
- Application for Building Permit — Planning, Engineering and Regulatory Services (Municipal Government)
- Water Resources Management Plan
- Waste Management Plan
- Environmental Protection Plan
- Fire Protection Plan

(viii) SCHEDULE:

Earliest Start Date: February 23rd, 2026

Latest Start Date: March 1st, 2026

Start date varies based on time to acquire permits and approvals as well as scheduling construction around ongoing contracts.

(ix) CAPITAL COST AND FUNDING:

The total project cost is estimated at \$890,000. Of this amount, Black Rock Construction Group will contribute \$534,000 (60%), comprised of cash and existing assets. Funding has been requested for up to \$356,000 (40%) from the Green Transition Fund in order to close the financing gap and ensure that the project can proceed at the required scale.

This grant is requested from:

**Department of Industry, Energy and Technology
Natural Resources Building
50 Elizabeth Avenue
P.O. Box 8700
St. John's, NL, A1B 4J6**

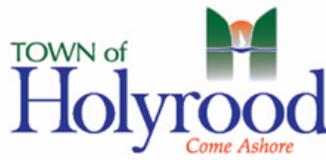
Should you require additional information, please e-mail info@blackrockpaving.ca.

2026-02-12

Date

Neil Pittman

Signature of Proponent



February 12, 2025

86790 NFLD Limited
Neil Pittman
1 Rocks Road
Logy Bay

info@blackrockpaving.ca

Dear Neil:

I have been instructed by the Council of the Town of Holyrood (hereinafter “the Council”) to provide you with the following decision in relation to your application for a Development Permit.

Your application for development for the construction of a Shingle Recycling Facility at 49 Horizon Drive (Lot 5-7) was presented at a regular meeting of Council on May 28, 2024.

I am pleased to inform you that the requested Development Permit has been Approved in Principle, pursuant to s. 20 of the Town of Holyrood Development Regulations (hereinafter “the Development Regulations”).

This approval in principle is subject to the following building and development standards.

General compliance with all Town Development Regulations, which include the following:

- a. Compliance to the National Building Code of Canada 2015 and Fire Codes; A copy of this code, supplement or amendments is available at <http://www.nationalcodes.nrc.gc.ca/eng/nbc/index.html>. The responsibility for compliance with the National Building code is with developer/contractor;
- b. One (1) complete set of building plans to become property of the Town of Holyrood;
- c. Legal land survey with description;
Certified plot plan - A certified location showing the planned building location on the survey plan. Provide all measurements regarding frontage, set back, rear yard, side yard and neighbouring buildings together with sufficient elevation data pertaining to any potential drainage problems. The size and shape of your proposed building must be indicated together with the relevant dimensions; Any changes to the approved plot plan or any other information on file must be

approved by the Town

- d. Approvals from all other regulatory bodies of government that may be impacted by your development including an inspection from the Holyrood Fire Department. You are required to submit copies of approvals from all governing bodies i.e Service NL, etc. including the Holyrood Fire Department.
- e. Parking requirements: One space for every employee, plus 3. Minimum size space of 2.75 m x 5.8 m.
- f. Wheelchair accessible parking is required in accordance with the *Buildings Accessibility Regulations*.
- g. All changes in the use of the building must be approved by the Town of Holyrood;
- h. As per Schedule D of the Town of Holyrood Development Regulations, please submit a scaled drawing of the parking area showing all available parking spaces.
- i. Prior to paving the driveway, a separate permit is required.

1. Culvert Policy

As per the Town's Culvert Installation Policy (*see office for copy of the policy*), the Town requires that all applicants for new developments install driveway/ roadway culverts in existing or newly constructed ditches. Filling in of ditches with rock or gravel is not permitted. These culverts must be installed prior to any further development on the site, failure to comply with this policy will result in the issuance of a Stop Work Order. The applicant is responsible for the cost of the culvert and the installation.

2. NEW INFO: Two-Step Permit Process

The Town of Holyrood has implemented a two-step permit process.

First Permit- Development Permit

For completion of the footing only. Certificate of Location is required before the building permit is issued, and any further development takes place.

Second Permit- Building Permit

When certificate of Location is received and approved by the Town, Permit 2 will be provided for the construction of the building

Failure to comply with the 2-permit process could result in a Stop Work Order or Removal Order if the building is not in compliance with the Town's Development Regulations.

3. Water & Sewer

There is no access to town water services in this location, therefore a drilled well is required for water access.

You are required to send a copy of this letter of conditional approval, your application and a copy of the septic tank design drawings to Government

Services, 5 Mews Place, P.O. Box 8700, St. John's, NL A1B 4J6 for their approval;

- Provide the Town with a copy of the approved septic system design from one of the approved designers;
- Provide the Town with a Certificate of Approval from Government Services for the on-site sewage system;

4. **Sign Permit**

Subject to the provisions of Regulation 67 of the Town of Holyrood Development Regulations, no sign shall be erected or displayed unless a permit for the sign is first obtained by the town.

5. **Civic Numbering Regulations**

The Town of Holyrood has adopted Civic Numbering Regulations which requires the civic number of the residence or business to be displayed on the main building of each property in a conspicuous location and displayed in a visually suitable manner. For a copy of these regulations, please contact the Town Office.

6. **Occupancy**

You must pick up an Occupancy Permit prior to occupying your business. **An occupancy permit cannot be approved until the civic address is posted on each building and an inspection by the Holyrood Fire Department is completed.** Please contact 709-229-7278 or email firechief@holyrood.ca to arrange an inspection

7. **Sign Permit**

Subject to the provisions of Regulation 67 of the Town of Holyrood Development Regulations, no sign shall be erected or displayed unless a permit for the sign is first obtained from the town.

8. **Waste Material from Construction**

The Town of Holyrood does not permit the onsite burial or burning of waste from the construction of your home. Waste materials arising from the construction of the referenced structures must be sent for disposal to a waste disposal site which has a current approval to operate which has been issued by the Department of Environment & Conservation or Service NL. A complete copy of the Government of NL Department of Environment & Conservation Act can be found online at <http://www.assembly.nl.ca/legislation>

9. **Alterations to the Natural Environment**

Development proposals shall include plans for grading, ditching, and landscaping. Significant alterations to the natural environment (such as changing the drainage pattern or removing vegetation) will be considered during the evaluation of development proposals. Alterations which will

adversely affect adjacent property of watercourses shall not be permitted. Topsoil or sods shall not be removed except with the approval of Council.

10. Mature Trees

Because of their importance to the landscape and to the privacy and amenities of residential areas, mature trees shall be preserved and replaced as necessary. Such trees may be removed only when they become dangerous because of age, disease, or proximity to a building; if they are overcrowded, and unduly inhibit light and air circulation for landscape purposes and building occupancy; or if they will unduly obstruct construction.

Where necessary, Council may require a Landscape Plan to identify how mature trees shall be preserved and replaced where necessary. A site visit will be required by the Director of Infrastructure & Public Works to determine or not a Landscape Plan.

11. Fees

The following fees must be paid, and a permit issued before any development takes place:

- \$ 500 Landscaping deposit (refunded when front landscaping is completed)
- \$ 100 Occupancy Permit
- \$ _____ Building permit (based on \$3.00 per ___ square meters)

\$_____ Total Permit Fee to be determined when building plans are submitted

If you choose to prepare your site prior to paying for and picking up your development permit, you must complete a site preparation permit at a cost of \$50.00.

12. No Changes

No changes are permitted to the conditional approval unless approved by the town.

13. Development Time Period

This conditional approval is for one year. If your development has not commenced within this year, you may request to have your approval renewed for a further period, not in excess of one year.

If your development has not commenced within two years you will be required to complete a new development application and submit for approval.

14. Right to Appeal

In accordance with s. 23 of the Development Regulations, Council advises that you, or other persons with an interest in the proposed Application for a Development Permit, have the right to appeal Council's decision to the Eastern Newfoundland Regional Appeal Board, which was established

under the Regional Appeal Boards Establishment Order under the Urban and Rural Planning Act (O.C. 96-174). Your appeal must be forwarded to:

Secretary
Regional Appeal Boards
c/o Municipal and Intergovernmental Affairs
Government of Newfoundland Labrador
P.O. Box 8700 St. John's, NL A1B 4J6

Pursuant to s. 42(5) of the Urban and Rural Planning Act (S.N.L. 2000, c. U-8), an appeal shall be in writing and shall include:

- (a) a summary of the decision appealed from;
- (b) the grounds for the appeal; and
- (c) the required fee

Thank You

Thank you for choosing Holyrood for your business We look forward to assisting you throughout the development process.

Welcome Ashore!

Sincerely,



Marjorie Gibbons
CAO

/ct

cc: Holyrood Fire Department