

October 28, 2022

**Attention: Sonja Bridges**

**Client file NO: 5684.00**

**Environment Act Licence No. 3199R**

Dear Sonja,

Urbanmine is requesting an extension for the full implementation of all the noise mitigation measures that were identified in Dillon Consulting Limited's (Dillon's) Acoustic Assessment Report dated March 2015. This requirement is under Clause 36 of our current Environment Act Licence [EAL No. 3199R].

As indicated during our in-person meeting on October 12, 2022, the original noise mitigation recommendations (Dillon's 2015 report) were based on a series of conservative assumptions and considerations, including conservative modes of operation and equipment noise levels. Since all noise sources are (will shortly be) onsite and operational, an update to the noise study, consisting of site-specific noise measurements for the new equipment and determination of an optimized noise mitigation plan is necessary. The extension is requested so that time is allowed for complete installation and commissioning of the new equipment, onsite noise measurement (weather dependent) and preparation of an updated site-wide noise source inventory, noise remodeling and optimization of noise mitigation measures.

As per our discussions during the October 12, 2022 meeting, our proposed plan moving forward with regards to the noise mitigation measures is as follows:

1. Upon full commissioning of all the equipment at the Facility (including non-ferrous), a source-specific noise measurement campaign will be undertaken at the Facility to gather site-specific noise data. This may include confirmatory noise measurements for noise sources that were measured onsite previously. The noise propagation model for the site will be updated to reflect the new noise measurements and the mitigation measures that have already been implemented at the Facility. Based on the modelling results an optimized Noise Abatement Action Plan (NAAP) will be prepared for the Facility such that upon full implementation, the Facility will be in compliance with provincial nuisance noise guidelines (i.e., 55 dBA at receptors). Based on the timeline for completion and commissioning of the Facility we expect onsite noise measurements to be completed in Spring 2023.
2. The noise modelling results and the optimized NAAP will be summarized in a report, which will include details of each of the proposed mitigation measures and the corresponding implementation timeline. The report will be submitted to Manitoba Environment, Climate and Parks (MECP) for review and approval by May 31, 2023.
3. Upon approval of the NAAP by MECP, Urbanmine will implement the mitigation measures proposed in the report as per the specified implementation timeline. As the mitigation measures are unknown at this time, we estimate a NAAP completion date of May 31, 2024.

**Noise Pollution Monitoring Plan:**

Urbanmine is requesting to discontinue the noise pollution monitoring plan currently approved under Clause 37 of our Licence [EAL No. 3199R]. The ambient noise monitoring program was initially completed to determine contributions from Urbanmine to the ambient noise environment at nearby receptors. The ambient noise measurements provide cumulative noise levels (hourly) at the receptors and the audio files help identify the sources of emissions. However, while the ambient noise monitoring program helps with determining the existing noise environment (elevated urban area), it cannot determine compliance of the Facility with the applicable criterion (55 dBA) as the measured levels are

cumulative and from all sources in the area. For compliance determination, noise propagation modelling (as proposed in the plan outlined above) similar to the 2015 report is required.

An alternative follow-up noise pollution monitoring plan, prepared by Dillon, to verify the effectiveness of the mitigation measures will be submitted to the Province for review and approval after the mitigation measures have been implemented at the facility.

Sincerely,

Linda Gammon  
QEH&S Coordinator