



Conservation and Water Stewardship

Environmental Stewardship Division
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February 11, 2015

SVEN T. HOMBACH

Fillmore Riley LLP
1700-360 Main Street
Winnipeg, MB R3C 3Z3
shombach@fillmoreriley.com

Dear Mr. Hombach:

Re: Urbanmine Inc. – Environmental Monitoring Report Review

The Environmental Monitoring Report dated December 16, 2014 prepared by Dillon Consulting for Urbanmine facility located at 72 Rothwell Road in Winnipeg has been reviewed. The following are some comments summarized for your consideration for a future monitoring requirement.

Noise Monitoring:

The equipment used and the calibrations are acceptable. The following are concerns on the results compiled and presented for noise monitoring.

- The discussion did not clearly indicate the date and time of the day that was monitored for a background noise assessment.
- In accordance with the Ontario Environmental Noise Guidelines, NPC-300, the noise generated by ambulance siren and train should have been excluded when establishing the background noise level.
- The report did not discuss how the average Leq in Table 1 for the hourly sound pressure was calculated. The facility operation log (Appendix H) indicated that most of the outside machineries were operating between 7am and 5pm. The average Leq calculated for this period of operation shows a higher average value of Leq than the one reported in the table.
- There is no rationale provided for the selection of monitoring location L1 (on top of the roof).

- An impulsive sound is a typical noise generated in facilities such as Urbanmine. There is no indication how this type of sound has been assessed.
- The raw data provided in Appendix A indicates that on October 10, 2014, for most of the period the facility operated its machinery, the sound was not recorded. This was not discussed in the report.
- For monitoring stations L2 and L3 there is no discussion if any precaution was taken to avoid a reverberant effect of the fence.

Vibration Monitoring

- The vibration monitoring is reviewed and considered acceptable.

Particulate Monitoring

- A meaningful assessment is not possible because some of the TSP samples were collected during less than an 18-hour period. According to Environment Canada's data completeness criteria, sample collection should cover at least 75% (hours) of a day (18 hours) to be valid 24-hour average data.
- The rationale for considering the particulate concentration obtained from samples A-MP3-1 and A-MP2-3 as background ambient particulate concentration is not discussed.
- There was no specification or background provided to support the selection of a Gillian High Volume Air Sampler for the assessment.

If you have any question regarding the comments, please contact the undersigned at (204) 945-7023 or Eshetu.Beshada@gov.mb.ca.

Yours truly,

“original signed by”

Eshetu Beshada, Ph.D., P. Eng.
Environmental Engineer
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Registries