BLACK ROCK
PAVING • CONSTRUCTION • MARINE

Date: September 26, 2025

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 75 Sugarloaf Road, St. John's, 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: 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**

Proponents, where applicable, must be in good standing with the Registry of Companies.

THE UNDERTAKING:

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

(ii) Purpose/Rationale/Need for the Undertaking: **Divert shingle waste from landfills to be repurposed into Recycled Asphalt Pavement (RAP).**

(i) Geographical Location

The intended site prospected to implement the asphalt shingle recycling facility is located at 75 Sugarloaf Road and has been cleared for industrial/commercial zoning. The site is located near the Robin Hood Bay landfill and various industrial businesses, making it an ideal location for a recycling facility.

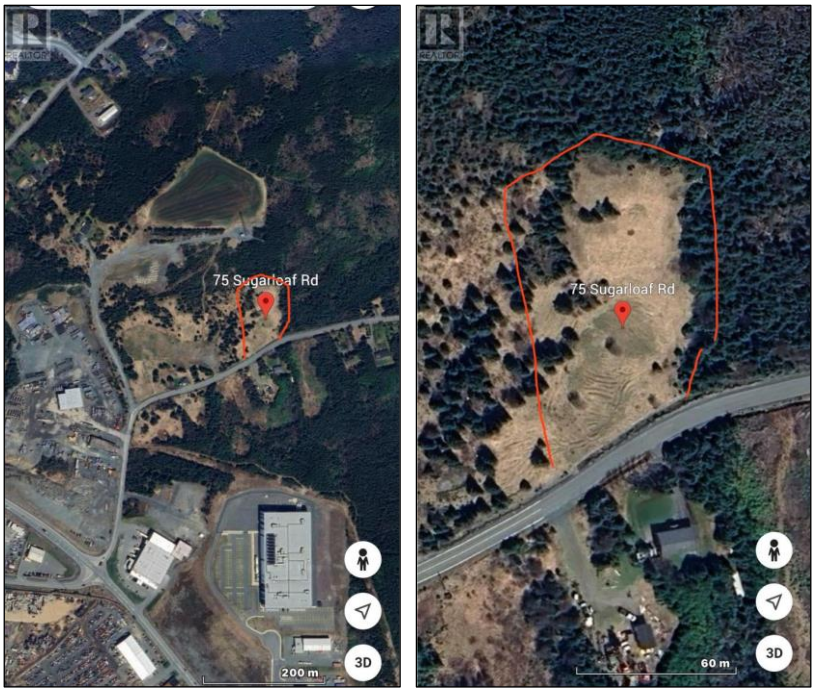

Figure 1: Plot of land to be acquired.

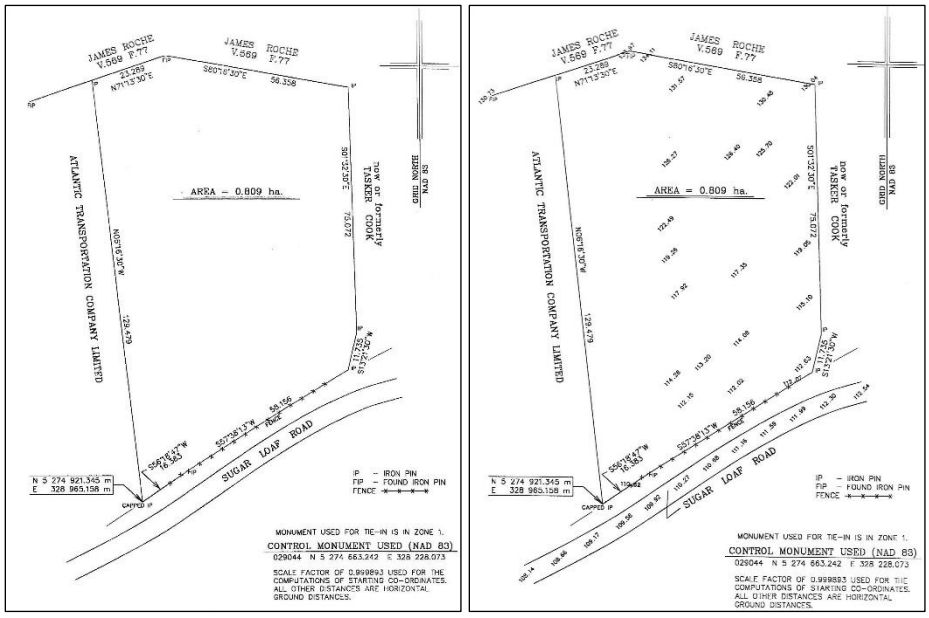

Figure 2: Land survey showing dimensions and angles.

Figure 3: Topographic survey of 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

The size of land for the undertaking to be implemented is approximately 1 Acre, or half of the lot shown in Figures 1 and 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 and residences will be notified of the new operations. The nearest residential property to the site is approximately 300 metres. The concept plan shown in Figure 4 gives a general idea of the layout planned for the site.

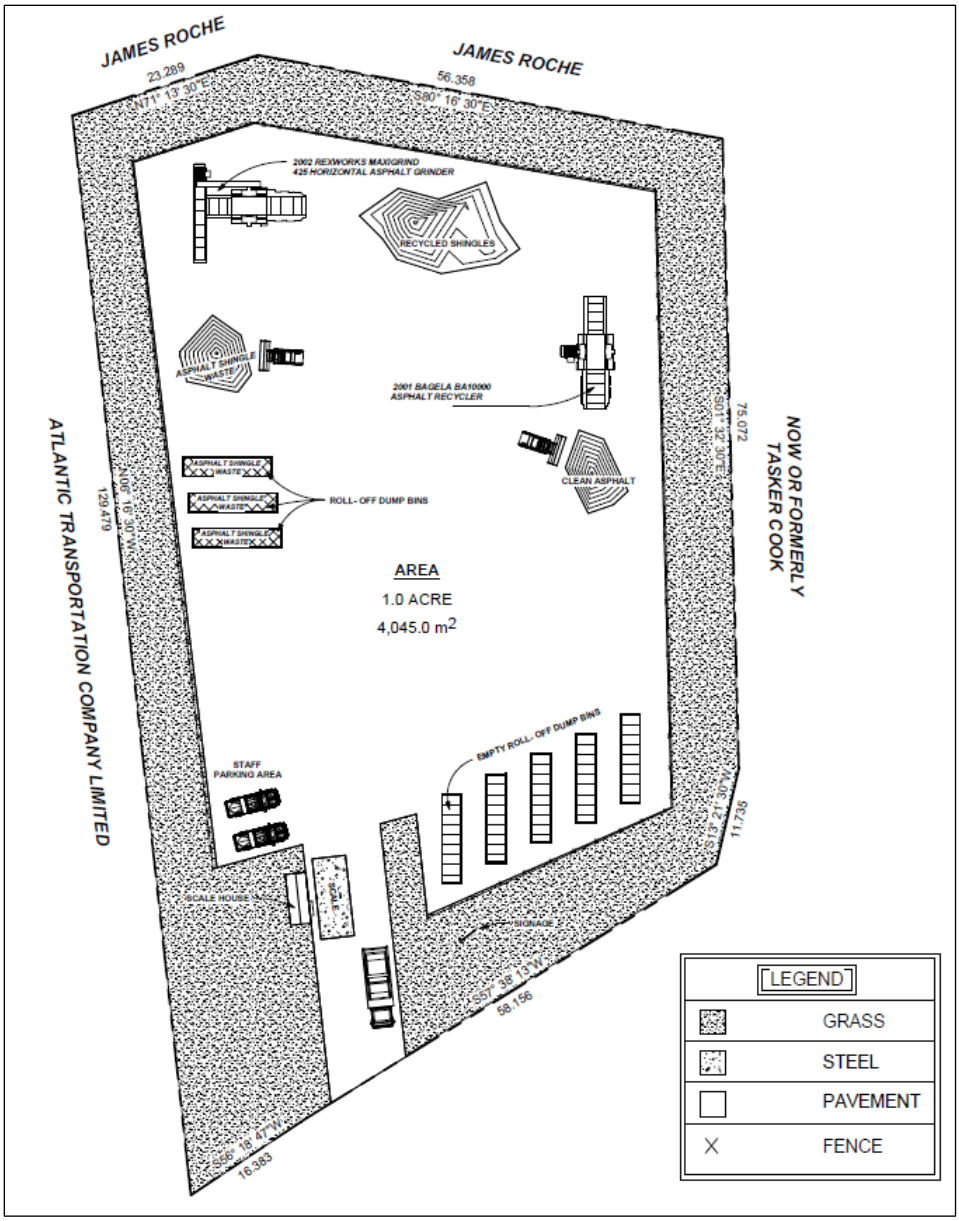

Figure 4: Site concept plan.

(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, the proposed start date of physical construction on site is planned for December 1st, 2025.

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 solid waste or liquid pollutants will be produced by construction.

Some possible causes of resource conflicts during construction are:

- **Heavy equipment conflicts**
    - Same machine needed in two places (dozer/excavator/graders double-booked).
    - Single points of failure (only one water truck, roller, or trailer for mobilization).
    - Maintenance downtime competing with production windows.
- **Water & dust control vs. compaction**
    - One water source or truck serving both dust suppression (clearing/haul roads) and moisture conditioning (subgrade/aggregate base).
- **Materials & consumables**
    - Aggregate or asphalt deliveries not aligned with paving start.
- **Utility locates & protection**
    - Waiting on locate crews.
    - Conflicts between grading cuts and temporary power/water lines.
- **Permits, hours, and community constraints**
    - Noise/haul-hour limits compressing work into shorter windows, forcing multiple crews to pile onto the same area.
- **Weather windows**
    - Moisture-sensitive subgrade or temperature limits for asphalt causing reschedules that stack crews/equipment on the next clear day.

Mitigation for potential adverse environmental impacts include:

- Invest in covered storage to prevent contaminated runoff.
- Conduct regular equipment inspections and maintenance to prevent leaks.
- Plan construction timeline around seasonal weather conditions.

(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 grinded 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.

Some possible causes of resource conflicts during operation are:

Equipment and Machinery Conflicts

- **Single Point of Failure:** If the horizontal grinder or asphalt recycler goes down, the entire production line halts.
- **Competing Uses:** Skid-steers or hook-lift trucks may be required in two places at once (e.g., unloading bins while also feeding the recycler).
- **Maintenance vs. Production:** Preventative maintenance might clash with operational hours, creating downtime.

Mitigation:

- Keep backup agreements with rental providers.
- Maintain a strict preventative maintenance program.

Human Resource Conflicts

- **Crew Overlap:** Scale house staff, equipment operators, and contractors may need to coordinate at peak delivery times.
- **Skill Shortages:** Limited staff with specialized training (e.g., grinder/recycler operation) could slow production.

Mitigation:

- Train employees in multiple roles.
- Use shift rotations to balance workload.

Material and Storage Conflicts

- **Shingle Quality Variation:** Wet, frozen, or contaminated shingles may disrupt recycling efficiency.
- **RAP Output Handling:** If finished RAP is not removed or sold quickly, it can occupy valuable yard space.

Mitigation:

- Develop inventory management practices for both shingles and RAP.
- Create buffer zones for overflow storage.
- Establish agreements with buyers for steady RAP uptake.

Logistics and Traffic Conflicts

- **Truck Movements:** Delivery trucks, hook-lift bins, and customer vehicles may congest the scale area.
- **Scheduling:** Multiple contractors arriving at once could create congestion in weighing and unloading.
- **Road Access:** Facility traffic may conflict with municipal haul routes or peak commuting hours.

Mitigation:

- Implement scheduled drop-off and pick-up times.
- Design site layout with separate entry/exit lanes.
- Coordinate with municipalities on truck routes and noise control.

Potential pollutants during everyday operations are minimal, with petroleum runoff and equipment leaks being the main concern. 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) 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, color, 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.

APPROVAL OF THE UNDERTAKING:

Approvals 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)

SCHEDULE:

Earliest Start Date: December 1st, 2025

Latest Start Date: January 2nd, 2025

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

CAPITAL COST AND FUNDING:

The total project cost is estimated at $725,000. Of this amount, Black Rock Construction Group will contribute $435,000, comprising $255,000 in cash and $180,000 in existing assets, including an asphalt plant, screener, skid-steer, and other equipment. A funding request for $290,000 is made to 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 more information than listed in this document, please e-mail **info@blackrockpaving.ca**.

2025-09-25
Date

Neil Pittman
Signature of Proponent/Chief Executive Officer