

## TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the *Toxics Reduction Act* and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation (O. Reg.) 455/09.

### Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This Plan Summary applies to the Toxic Substance Reduction Plans for PM2.5
National Pollutant Release Inventory (NPRI) and O. Reg. 127/01 Identification Numbers	NPRI ID: 10249 O. Reg. 127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Cargill Limited 24 Ontario Street Halton Hills, Ontario L7G 3K6
The number of full time employee equivalents at the facility	51
North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	31 - Manufacturing 3113 – Sugar and Confectionary Product Manufacturing 311351 – Chocolate and chocolate confectionary manufacturing from cocoa beans
Public contact	Nigel Retford, EHS Leader
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	UTM Zone 17 586702 E, 4834462 N
Parent Company Information	Cargill Incorporated PO Box 5612 MS-12 Minneapolis, MN 55440-5612

### List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

- PM10\*
- PM2.5\*

\*Per O. Reg. 455/09, “no single CAS numbers apply to these substances”

### Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility’s intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

A statement of the Facility's intent to reduce its "creation" of the Toxic Substance has not been included as a part of this Plan. The Toxic Substance cannot be "used" in the Facility process and therefore no statement with respect to intent to reduce use of the Toxic Substance is required.

The Toxic Substance has triggered reporting under the TRA and O. Reg. 455/09 due to two activities at the Facility which are interpreted as "creations" of the Toxic Substance under the TRA framework. The first activity that has been classified as a "creation" of the Toxic Substance for the purpose of the required TRA Quantification, Accounting, and Reporting exercise for the Toxic Substances is the generation by physical means of suspended particulate matter in various size fractions commonly referred to as dust; which is subsequently released to the atmosphere.

The second activity that has been classified as a "creation" of the Toxic Substance is the generation of suspended particulate matter as a by-product of combustion of fuels in stationary equipment.

The MOECC has stated that the TRA is not intended to focus on "end of pipe" emissions as they don't necessarily have any bearing on the amount of a substance that is "used" or "created," however in this case, "end of pipe" emissions of suspended particulate matter is the determining factor of the Facility's TRA reporting status with respect to the Toxic Substance.

Despite the Facility's reporting status with respect to the Toxic Substance, the Facility feels that it has previously optimized its control of the "creation" and subsequent release of the Toxic Substance to the greatest extent that can reasonably be expected. This position is supported by the following information.

It is well documented that release of suspended particulate matter is an inherent by-product of activities undertaken in many industries, and that the activities leading to the release of suspended particulate matter are essential to these industries. In recognition of this, the MOECC has imposed various regulatory requirements related to the release of suspended particulate matter, which include:

O. Reg. 419/05, under which a Facility must demonstrate compliance with substance-specific ground-level concentration limits of emitted substances, including suspended particulate matter in all forms that are reportable under the NPRI and TRA reporting programs.

The requirement for any Facility that may discharge any contaminant to the atmosphere to apply for and obtain an Environmental Compliance Approval (ECA) for air which approves the facility's emissions and provides performance limits, documentation requirements, and reporting requirements which a Facility must meet in order to maintain compliance with the ECA on an ongoing basis.

Cargill currently meets all of the above regulatory requirements which are designed to control the release of the Toxic Substance and minimize potential off-site impacts resulting from the release of the Toxic Substance.

In addition most of the release points of the Toxic Substance are controlled by dust collectors which act to reduce the amount of the Toxic Substance "created" and released to the atmosphere.

## **Objectives of the Toxic Substance Reduction Plan**

The objectives of this Plan are as follows:

- provide the reader with information on measures currently in place at the Facility which control the “creation” and subsequent release of the Toxic Substance
- provide support for the Facility’s position with respect to the Statement of Intent of this Plan
- document how, by preparing this Plan, the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance

## **Description of Why the Toxic Substance Is Used or Created**

The Toxic Substance has triggered reporting under the TRA and O. Reg. 455/09 due to two activities at the Facility which are defined as “creations” of the Toxic Substance under the TRA framework. The first activity that has been classified as a “creation” of the Toxic Substance is the generation by physical means of suspended particulate matter in various size fractions as dust; which is subsequently released either as stack or fugitive emissions. The second activity that has been classified as a “creation” of the Toxic Substance is the generation of particulate matter as a by-product of combustion of fuels in stationary equipment. Due to the nature of the Toxic Substance, the substance can never be “used” in the Facility process.

For the purpose of the required TRA Quantification, Accounting, and Reporting exercise for the Toxic Substance, the calculated “release” values have been assumed to be equal to the amount “created” for each emission source, despite the fact that some of these releases are controlled releases. Section 12(6) of O. Reg. 455/09 provides considerations for determining the “Best Available Methods” for tracking and quantifying the Toxic Substance. MOECC guidance pertaining to this section of O. Reg. 455/09 states that the importance of selecting Best Available Methods is to provide the best decision making information when determining which toxics reduction options, if any, are worthwhile to implement. It should be noted that, given the Facility’s decision to not include in this Plan a statement of its intent to reduce the “creation” of the Toxic Substance (as supported by the information provided in the Statement of Intent section of the Plan), no decisions will be made with respect to toxics reduction based on the calculated “creation” values for the Toxic Substance. Taking this into consideration, the Facility used judgement based on relevance and effort required to obtain information and feels that it has gone to reasonable efforts in identifying and applying the Best Available Methods for quantifications in this case.

A graphical representation of the Facility’s “creation” and subsequent release of the Toxic Substance is provided as part of the Toxic Substance QAR exercise in Appendix A. Process Flow Diagrams (PFDs) and associated descriptions of stages and processes are described in detail in the following section.

## **Rationale for Not Implementing Toxic Substance Reduction Options**

As required by s.18(4) of O. Reg. 455/09 (as amended by s.9(3) of O. Reg. 214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories.

Therefore the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified.

### **Statement that the Plan Summary Accurately Reflects the Current Version of the Plan**

As required by s.24(1)8 of O. Reg. 455/09 this Plan Summary accurately reflects the current version of the Plan.

### **Planner License Number**

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan is as follows:

Russell Polack  
Air Quality Specialist  
Golder Associates Ltd.  
Toxic Substance Reduction Planner License Number TSRP0002

### **Copies of the Certification**

Certification statements are provided in the following pages.

**Toxic Substance Reduction Plans Certification by Highest Ranking Employee**

As required by s.4(2) of the *Toxics Reduction Act* (TRA), Toxic Substance Reduction Plans must contain a certification, signed by the highest ranking employee at the Facility who has management responsibilities relating to the Facility.

As per TRA guidance, if a Toxic Substance Reduction Plan is completed after the date prescribed in s.11.1 of Ontario Regulation (O. Reg.) 455/09, a rationale must be provided by the HRE which explains the reason that the Plan was completed after the prescribed date. Also following TRA guidance, a "Confirmation Statement" is being provided in place of the corresponding Certification Statement prescribed in s.19 of O. Reg. 455/09.

The following statement, made on behalf of the HRE satisfies the requirement for a written rationale for completing each respective Toxic Substance Reduction Plan listed below after the date prescribed in s.11.1 of O. Reg. 455/09:

*The Toxic Substance Reduction Plan subject to this Confirmation Statement has not been completed in accordance with s.11.1 of O. Reg. 455/09 as it has been prepared after the deadline outlined in O. Reg. 455/09 of December 31, 2016. The reason for this is that the previous owners of the Facility had prepared an equivalent Toxic Substance Reduction Plan which the Cargill understood would remain valid after Cargill took over the Facility. Cargill was advised by the Ontario Ministry of the Environment and Climate Change that this new Plan was required to be prepared after the deadline to prepare it had passed.*

The following Confirmation Statement satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plans that are assembled within this single document, with the exception of s.11.1 of O. Reg. 455/09:

As of (insert date) July 27, 2017 I, (insert name) Ryan Browne certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act, with the exception of section 11.1.

- PM2.5 (dated July 27, 2017)

Ryan Brown

Signature

July 27, 2017

Date

Ryan Browne

Print Name

**DATE** July 27, 2017

**PROJECT No.** 1774144

**TO** Nigel Retford  
Cargill Cocoa and Chocolate Georgetown

**CC** Natalie Jones

**FROM** Russell Polack

**EMAIL** rpolack@golder.com

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CERTIFICATION STATEMENT FOR THE TOXIC  
SUBSTANCE REDUCTION PLAN FOR THE TRA SUBSTANCE PM10  
CARGILL COCOA AND CHOCOLATE, GEORGETOWN FACILITY**

Dear Mr. Retford:

Golder Associates Ltd. (Golder) was retained by Cargill Cocoa and Chocolate Georgetown facility (the Facility) to provide various services pertaining to Toxic Substance Reduction Plan (the Plan) preparation for *Toxics Reduction Act* (TRA) substance referred to as PM10, including Toxic Substance Reduction Planner (Planner) certification.

Following TRA guidance, in circumstances where a Plan is prepared after the date prescribed in s.11.1 of Ontario Regulation (O. Reg.) 455/09, a Planner "Confirmation Statement" is to be provided in place of the corresponding Certification Statement prescribed in s.19 of O. Reg. 455/09. The following Confirmation Statement satisfied this requirement. Furthermore, the following Confirmation Statement is limited to the respective versions of the Plans which are dated as indicated in the Confirmation Statement:

*As of July 25, 2017, I, Russell Polack certify that I am familiar with the processes at the Cargill Cocoa and Chocolate Georgetown Facility that uses or creates the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the Toxics Reduction Act, 2009 that are set out in the toxic substance reduction plans referred to below for the toxic substances and that the plans comply with that Act and O. Reg. 455/09 (General) made under that Act, with the exception of section 11.1.*

- PM2.5 (July 27, 2017)



Russell Polack  
Toxic Substance Reduction Planner  
License No. TSRP0002

July 27, 2017

Date

RLP/NCJ/ca

[https://golderassociates.sharepoint.com/sites/11577g/05 technical work/tra planning/tra plans/2 - pm2.5/certification statements/2 - planner certification statement.docx](https://golderassociates.sharepoint.com/sites/11577g/05%20technical%20work/tra%20planning/tra%20plans/2%20-%20pm2.5/certification%20statements/2%20-%20planner%20certification%20statement.docx)

