

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 for the Substance(s) whose Toxic Substance Reduction Plans are summarized by this this Plan Summary | This Plan Summary applies to the Toxic Substance Reduction Plans for the following prescribed Toxic Substances: Particulate Matter, PM10, PM2.5 (Per O.Reg.455/09; "no single CAS numbers apply to these substances") |
| National Pollutant Release Inventory (NPRI) and O.Reg.127/01 Identification Numbers | NPRI ID: 29772 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 | DECAST Ltd. 8807 County Road 56 Utopia, Ontario L0M1T0 Canada |
| The number of full time employee equivalents at the facility | 498 |
| The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code | 32 – Manufacturing 3273 – Cement and concrete product manufacturing 327330 – Concrete pipe, brick and block manufacturing |
| Public contact | Bruce Parrinder Manager, Environmental Health & Safety/Human Resources DECAST Ltd. [address per above] (705) 734-2892 |
| The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum | UTM Zone 17 594127 E, 4910051 N |
| Parent Company Information | TACC Group 270 Chrislea Road Woodbridge, ON L4L 8A8 (905) 856-8500 |

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:

Chromium*
Manganese*
Nickel*
Particulate Matter*
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 is not "used" within the Facility's process and therefore no statement with respect to intent to reduce use of the Toxic Substance is required.

The Facility is captured by the requirements of the TRA pertaining to the Toxic Substance since the Facility meets the TRA's definition of target facilities "with North American Industry Classification System codes commencing with the digits 31-33 (manufacturing)" and also triggered the Toxic Substance's TRA reporting threshold, which was adopted by the TRA from National Pollutant Release Inventory (NPRI).

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 either as stack or fugitive emissions.

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 opinion is supported by the following two aspects:

Compliance with Regulatory Requirements

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

- Ontario Regulation 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.
- The ECA requirement to prepare and implement a "Fugitive Dust Best Management Practices Plan." This document outlines controls and best management practices in place with respect to minimizing suspended particulate matter releases in the form fugitive dust at the facility.
- The ECA requirement to prepare and implement an Operations and Maintenance Manual which outlines operating procedures and maintenance programs for processes with what the MOECC refers to as "Significant Environmental Impacts." This document assists Facility personnel in operating the Facility in a manner that minimizes the potential for environmental impacts.

Measures Currently in Place to Minimize Releases of Suspended Particulate Matter

As a result of satisfying all of the above noted regulatory requirements in addition to voluntary actions with respect to suspended particulate matter releases, the Facility actively implements a variety of controls to minimize suspended particulate matter releases from different parts of its process components. These controls include, but are not limited to, the following:

- Implementation of the controls outlined in the Facility's Fugitive Dust Best Management Practices Plan, which was developed in consultation with the MOECC; such as:
 - roadway watering, supplemented by application of chemical dust suppressants, enforcement of speed limits, roadway maintenance and cleanup procedures;
 - covering of outdoor conveyors; and
 - training of operators to identify and promptly respond to malfunctions or abnormal operating conditions that result in excessive suspended particulate emissions.
- Operation of several baghouses and/or dust collectors serving various process components to minimize suspended particulate matter. This equipment is actively, inspected and maintained in accordance with the terms and conditions of the Facility's ECA, or according to Manufacturer's specifications.
- Measures in place to minimize dust emissions from material transfers including, but not limited to, enclosed piping for cement unloading, 4-sided enclosures for sand/aggregate deliveries, and indoor storage of material.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the 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; and
- document how 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. The Toxic Substance is not 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.

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:

James McEvoy

Air Quality Specialist

Golder Associates Ltd.

Toxic Substance Reduction Planner License Number TSRP0288

Copies of the Confirmation

Confirmation statements are provided in the following page.

June 26, 2018

Project No. 1893705

Bruce Parrinder, Manager, EH&S/HR
DECAST Ltd.

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CONFIRMATION STATEMENT FOR TOXIC
SUBSTANCE REDUCTION PLANS FOR DECAST LTD. UTOPIA FACILITY**

Dear Mr. Parrinder

Golder Associates Ltd. (Golder) was retained by the DECAST Ltd. facility located at 8807 County Road 56 in Utopia, Ontario to provide various services pertaining to Toxic Substance Reduction Plan preparation under the *Toxics Reduction Act* (TRA), including Toxic Substance Reduction Planner (Planner) confirmation of Toxic Substance Reduction Plan (the Plans).

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 satisfies this requirement. Furthermore, the following Confirmation Statement is limited to the respective version of the Plan which is dated as indicated in the Confirmation Statement:

As of June 26, 2018, I, James McEvoy, certify that I am familiar with the processes at the DECAST Ltd. Utopia Facility that use 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 plan referred to below for the toxic substance and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act, with the exception of section 11.1.

- Chromium (dated June 19, 2018);
- Manganese (date June 19, 2018);
- Nickel (dated June 19, 2018);
- Particulate Matter (dated June 19, 2018);
- PM₁₀ (dated June 19, 2018);
- PM_{2.5} (dated June 19, 2018).



James McEvoy, P.Eng.

Toxic Substance Reduction Planner

License No. TSRP0288

BSF/JDM/NCJ/ng

[https://golderassociates.sharepoint.com/sites/1893705/technical work/tra plans/confirmation statements/1893705 decast tra planner confirmation.docx](https://golderassociates.sharepoint.com/sites/1893705/technical%20work/tra%20plans/confirmation%20statements/1893705%20decast%20tra%20planner%20confirmation.docx)

Toxic Substance Reduction Plans Confirmation 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 (HRE) 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.

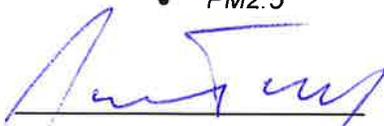
The following statement, made on behalf of the HRE, satisfies the requirement for a written rationale for completing the Toxic Substance Reduction Plan listed below after the date prescribed in s.11.1 of O. Reg. 455/09:

The Toxic Substance Reduction Plans subject to this Confirmation Statement had 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. This plan could not be submitted due to a lack of resources and expertise at the Facility.

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. 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 June 19, 2018,, I, Jim Tully, P.Eng., Executive Vice President, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are 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.

- Chromium (dated June 19, 2018)
- Manganese (dated June 19, 2018)
- Nickel (dated June 19, 2018)
- Particulate Matter (dated June 19, 2018)
- PM10 (dated June 19, 2018)
- PM2.5 (dated June 19, 2018)



Jim Tully
Executive VP
DECAST Ltd.

June 19, 2018

Date