

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 Plan for the following prescribed Toxic Substances: ■ Ammonia (Total) (Per O.Reg. 455/09; “no single CAS number applies to this substance”)
National Pollutant Release Inventory (NPRI) and O.Reg.127/01 Identification Numbers	NPRI ID: 3541 O.Reg.127/01 ID: 5103
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	Essroc Italcementi Group – Picton Cement Plant 1370 Highway 49 South Picton, Ontario K0K 2T0
The number of full time employee equivalents at the facility	137
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 327310 – Cement Manufacturing
Public contact	Anthony Jones Director of Environment 3251 Bath Pike Nazareth, Pennsylvania 18064 anthony.jones@essroc.com 610-837-3329
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	330011.27, 4880204.50, Zone 18T
Parent Company Information	Essroc Italcementi Group 3251 Bath Pike Nazareth, PA 18064

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:

Ammonia (total)*

*Per O.Reg. 455/09, “no single CAS number applies to this substance”

Statement of Intent

A statement of the Facility’s intent to reduce the “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 the use of the Toxic Substance is required.

The 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 Substance is the release of the Toxic Substance into the air when limestone is heated in a kiln during the process of cement clinker production. Due to the presence of nitrogen and/or ammonia like compounds found naturally in the limestone rock, the Toxic Substance is created and released as an air emission during this clinker production process. The creation of the Toxic Substance can only be reduced by reducing the Facility’s production or by using a limestone rock that contains less nitrogen and/or ammonia like compounds, which both represent economic infeasible options. Therefore, a statement of the Facility’s intent to reduce the “creation” of the Toxic Substance has not been included as part of this Plan.

It should be noted that existing processes and systems in place at the Facility are capable of meeting or exceeding exposure and release limits imposed by applicable occupational and environmental regulations. This is supported by the following aspects:

- Ontario Regulation 419/05, under which a Facility must demonstrate compliance with substance-specific ground-level concentration limits of emitted substances, including substances 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; and
- the requirement to monitor these emissions through routine testing activities (either spot measurements or continuous emission monitoring).

Objectives of the Toxic Substance Reduction Plan

The Objectives of this Plan are as follows:

- Provide support for the Facility’s position with respect to the Statement of Intent of this Plan;
- Provide the reader with an understanding of the nature of the Facility activity which the TRA has defined as a “creation” of the Toxic Substance; 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 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 Substance is the release of the Toxic Substance into the air when limestone rock is heated in a kiln during the process of cement clinker production.

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”. S.12(6) of O. Reg. 455/09 provides considerations for determining the “Best Available Methods” for tracking and quantifying the Toxic Substance. MOE 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 and Section 7.1, 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:

Jamie McEvoy

Toxics Reduction Planner

Golder Associates Ltd.

Toxic Substance Reduction Planner License Number TSRP0288

Copies of the Certification

Certification statements are provided in the following page.