

## 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
<b>Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any</b>	This Plan Summary applies to the Toxic Substance Reduction Plans for the following prescribed Toxic Substances: Nitrogen Oxides (CAS number 11104-93-1)
<b>National Pollutant Release Inventory (NPRI) and O.Reg.127/01 Identification Numbers</b>	NPRI ID: 11227 O.Reg.127/01 ID: N/A
<b>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</b>	Fisher Wavy Inc. 1 Caesar Road Sudbury ON P3E 5P3
<b>The number of full time employee equivalents at the facility</b>	65
<b>North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code</b>	32 - Manufacturing 3273 – Cement and Concrete Product Manufacturing 327320 – Mix Concrete Manufacturing
<b>Public contact</b>	Andrew Wallgren Fisher Wavy Inc. 1 Caesar Road Sudbury ON P3E 5P3
<b>The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum</b>	Easting – 497208 Northing – 5145745 NAD 83 UTM Zone 17
<b>Parent Company Information</b>	N/A

## **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:

Particulate Matter\*

PM10\*

PM2.5\*

Nitrogen Oxides [CAS number 11104-93-1]

\*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 its generation as a by-product of combustion of fuels in stationary equipment which is interpreted as a “creation” of the Toxic Substance for the purpose of the required TRA Quantification, Accounting and Reporting exercise for the Toxic Substance.

The MOE 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” emission of the Toxic Substance are 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 information.

It is well documented that the release of combustion products such as the Toxic Substance is an inherent by-product of activities undertaken in many industries, including mix concrete manufacturing, and that the activities leading to the release of suspended particulate matter are essential to these industries. In recognition of this, the MOE has imposed various regulatory requirements related to the release of combustion products, which include:

- Ontario Regulation 419/05, under which a Facility must demonstrate compliance with substance-specific ground-level concentration limits of emitted substances, including combustion products 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.

Fisher Wavy currently meets and/or exceeds 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.

## **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; 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 generation of the Toxic Substances as a by-product of combustion in fuels in stationary equipment. The Toxic Substance cannot be "used" in the Facility process.

## **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 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 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: 11227 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	Fisher Wavy Inc. 1 Caesar Road Sudbury ON P3E 5P3
The number of full time employee equivalents at the facility	65
North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	32 - Manufacturing 3273 – Cement and Concrete Product Manufacturing 327320 – Mix Concrete Manufacturing
Public contact	Andrew Wallgren Fisher Wavy Inc. 1 Caesar Road Sudbury ON P3E 5P3
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	Easting – 497208 Northing – 5145745 NAD 83 UTM Zone 17
Parent Company Information	N/A

## **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:

Particulate Matter\*

PM10\*

PM2.5\*

Nitrogen Oxides [CAS number 11104-93-1]

\*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 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 MOE 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, including mix concrete manufacturing, and that the activities leading to the release of suspended particulate matter are essential to these industries. In recognition of this, the MOE 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 requirement for qualifying a facility to prepare and implement a "Fugitive Dust Best Management Practices Plan." This document outlines controls in place with respect to minimizing suspended particulate matter releases in the form fugitive dust at the facility, along with the decision making process that was used to identify fugitive dust emission sources and to develop appropriate best management practices for each type of source. A qualifying facility's Fugitive Dust Best Management Practices Plan must be approved by the MOE as a part of the ECA implementation process.

Fisher Wavy currently meets and/or exceeds 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.

## **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; 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. 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. 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, 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.