

## 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 455/09. This plan summary accurately reflects the content of the Plan for “PM10 – Particulate Matter <= 10 Microns”

### Basic Facility Information

Mandatory Basic Facility Information Item	Details
<b>Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any</b>	PM <sub>10</sub> – Particulate Matter <= 10 Microns [Per O. Reg. 455/09; “no single CAS number applies to this substance”]
<b>NPRI and O.Reg.127/01 Identification Numbers</b>	NPRI ID: 27065 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>	R.W. Tomlinson Limited TRM Stittsville 891 Jinkinson Road Ottawa, ON K2S1B9
<b>The number of full time employee equivalents at the facility</b>	10
<b>NAICS codes and the six-digit NAICS Canada code</b>	NAICS 2 Code: 32 - Manufacturing NAICS 4 Code: 3273 – Cement and Concrete Product Manufacturing NAICS 6 Code: 327320 – Ready-Mix Concrete Manufacturing
<b>Public contact</b>	Domenic Idone Tomlinson Ready Mix 5997 Power Road Ottawa, ON K1G3N4
<b>The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum</b>	UTM Zone 18 423578 E, 5010338 N
<b>Parent Company Information</b>	Tomlinson Group of Companies

# 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 – Particulate Matter <= 10 Microns \*

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

## Statement of Intent

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 types 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 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 resulting from 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, the “creation” and subsequent release 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:

### 1) Compliance with Regulatory Requirements

It is well documented that the release of suspended particulate matter is an inherent by-product of concrete ready mix facilities with the following activities contributing to the “creation” and release of the Toxic Substance:

- material handling;
- cement and cement supplement silo filling;
- batching and truck mixing;
- truck traffic on unpaved roadways; and
- combustion from stationary sources.

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;
- 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 a qualifying 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; and
- The requirement to prepare and implement an Operations and Maintenance Manual which outlines operating procedures and maintenance programs for processes with what the MOE 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 and is also a part of the ECA implementation process.

TRM 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.

## **2) 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, TRM 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 MOE; such as:
  - Regular road watering, sweeping of Facility paved roadways and dust suppressant application to Facility unpaved roadways;
  - Dust suppressant application to Facility unpaved roadways;
  - strategic placement of stockpiles with respect to windbreaks (e.g., buildings and hills) for material that is susceptible to wind erosion;
  - installation of wind screens in the vicinity of certain material handling operations where existing wind breaks may not be available;
  - optimization of material stockpile size, location and drop heights; and

- reactive measures including curtailing operations in the event of visual disturbance of dust that may occur despite the above controls.
- Operation of baghouses and/or dust collectors serving various process components to minimize suspended particulate matter. This equipment is actively maintained as outlined in the Facility's Operations and Maintenance Manual, which was developed in consultation with the MOE.
- In an effort to reduce fuel consumption and reduce the creation and release of the Toxic Substance, the Facility provides routine maintenance on the fuel burning equipment to ensure they are operating efficiently and are not burning excess fuel, which leads to unnecessary additional creation and release of the Toxic Substance. In addition, comfort heating through fuel combustion is the only practical source of comfort heat at this time.

## **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 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 covered.

## **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 set of activities that has been classified as a "creation" of the Toxic Substance is the generation of suspended particulate matter in various size fractions as dust from the concrete manufacturing process; 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 resulting from combustion of fuels in stationary equipment. Due to the nature of the Toxic Substances, these substances can never 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:

James McEvoy, B.A.Sc.  
Air Quality Specialist  
Golder Associates Ltd.  
Toxic Substance Reduction Planner License Number TSRP0288

## **Copies of the Certification**

Certification statements are provided in the following page.

**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.

The following Certification Statement is being made under s.19(2) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) and satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plans that are assembled within this single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plan which are dated as indicated in the Certification Statement:

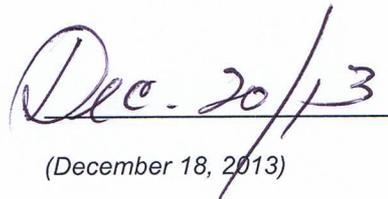
*As of December 18, I, Marcel Parisien, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.*

- PM10 – Particulate Matter <= 10 Microns

(December 18, 2013)



Signature



(December 18, 2013)



Marcel Parisien

December 18, 2013

Project No. 13-1151-0222

Domenic Idone  
R.W. Tomlinson Limited Tomlinson Ready Mix  
5997 Power Road  
Ottawa, ON  
K1G3N4

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CERTIFICATION STATEMENT FOR PHASE II  
TOXIC SUBSTANCE REDUCTION PLANS FOR R.W. TOMLINSON LIMITED TOMLINSON READY MIX  
STITTSVILLE FACILITY**

Dear Mr. Idone::

Golder Associates Ltd. (Golder) was retained by the R.W. Tomlinson Limited Tomlinson Ready Mix facility located at 891 Jinkinson Road, Ottawa, ON, (the Facility) to provide various services pertaining to Phase II Toxic Substance Reduction Plan preparation under the *Toxic Reduction Act* (TRA), including Toxic Substance Reduction Planner (Planner) certification of Phase II Toxic Substance Reduction Plans (the Plan).

The following Planner Certification Statement which is made under s.19.1(4) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) satisfies the Planner Certification requirements for the Plans that are assembled as a single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

*As of December 18, 2013, I, Jamie McEvoy certify that I am familiar with the processes at the Tomlinson Ready Mix Stittsville facility. Tomlinson Ready Mix facility located at 891 Jinkinson Road, Ottawa, ON that uses 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 Ontario Regulation 455/09 (General) made under that Act.*

- *PM10 – Particulate Matter <= 10 Microns* (dated December 18, 2013)



James McEvoy, B.A.Sc.  
Toxic Substance Reduction Planner  
License No. 0288

December 18, 2013

Date

JDM/FSC/ng

