

FLORADALE FEED MILL LIMITED

**TOXIC SUBSTANCE REDUCTION
PLAN SUMMARY**

2016 Operations – Phase II Substances

Cobalt (and its compounds)

**Phosphorous (total)
Particulate Matter <= 10 microns (PM₁₀)
Particulate Matter <= 2.5 microns (PM_{2.5})**

Date
December 22, 2017

TOXIC REDUCTION POLICY STATEMENT OF INTENT

Floradale does not intend to reduce the amount of cobalt and phosphorous used in its production of animal feeds nor is there any option at this time to reduce the creation of the particulate matter (PM10 or PM2.5) that results from the handling and processing of the bulk dry feed ingredients (grains).

However as Floradale is committed to protecting the environment, wherever feasible, the reduction of these substances will be implemented should alternatives that are both technically and economically feasible be identified. Our employees are encouraged to participate in all types of reduction activities but the toxic substances associated with Floradale operations are primary ingredients in our feeds to improve and maintain the health of livestock and companion animals or by-products created during the processing activities or supporting operations. An additional effort is also ongoing at the facility to reduce the discharge and disposal of these toxic substances as this is not only environmentally responsible operations it also indicates improved efficiencies in our processing operations.

Floradale Feed Mill Limited is deeply committed to the sustainability of the food chain from animal nutrition to human health. The safety of that food chain and an awareness of impacts on the environment and society are the foundations for sustainability. Ongoing research in animal nutrition will identify any opportunities to reduce or replace the use of potentially toxic substances for the environment while maintaining the quality of feed for optimal animal nutrition.

REDUCTION OBJECTIVES

All employees at Floradale Feed Mill Limited will be involved in the reduction of toxic substance use, creation and releases. Cobalt, Phosphorous, Particulate Matter (PM10 and PM2.5) are the priority substances identified in this planning for the reduction associated with off-specification feed formulations and ultimate disposal of toxic containing materials as well as reducing the creation of the substances during handling and production. Floradale's goal is to continue to reduce the amount of feed disposed of that contain the cobalt and phosphorous compound and limit the particulate matter creation where technically and economically feasible. Floradale Feed Mill Limited is committed to animal health and nutrition and as advances in nutritional research occur any changes in the source of nutritional supplements will be incorporated into Floradale's feed formulation as it is granted approval by the appropriate governing bodies and found to be an economically viable alternative. Therefore, there are no options being implemented at this time.

PLAN SUMMARY STATEMENT

This plan summary accurately reflects the content of the toxic substance reduction plan for cobalt, phosphorous, PM10 and PM2.5, prepared on behalf of Floradale Feed Mill Ltd. dated 28 December 2017.

BASIC FACILITY INFORMATION

Company Name: Floradale Feed Mill Limited

Contact Information:

Highest Ranking Employee: Craig Schwindt
President
519-669-5478
craigs@ffmltd.com

Technical Contact: Brian Chamberlain
Operations Manager
519-669-5478
brianc@ffmltd.com

Certified Planner: Beth Rhyno P.Eng.
License Number TSRP0273
Senior Environmental Engineer
Amec Foster Wheeler Environment & Infrastructure
519-650-7104
beth.rhyno@amecfw.com

Parent Company: Floradale Feed Mill Limited
100% ownership

Facility Address: 2131 Floradale Road
Floradale, Ontario
N0B 1V0

UTM Locator (NAD83): Zone - 17
533851E; 4830854N

Business Number: 101825560

The facility's NPRI ID: 0000010220

In 2016, Floradale Feed Mill Ltd. employed about 90 full time employees (equivalent)

The NAICS codes applicable to the facility are:

31	- Manufacturing
3111	- Animal Food Manufacturing
311119	- Other Animal Food Manufacturing

The site utilizes four (4) MOECC prescribed Phase II Toxic compounds: Cobalt, Phosphorous, PM10 and PM2.5. The substances are utilized as essential nutritional ingredients in the multiple animal feed products developed during production. As all four of these substances are essential nutritional requirements for livestock feed or for supporting operations, one collective TRA plan has been developed.

The CAS numbers for the MOECC Toxic Compounds are:

Cobalt (and its compounds)	NA-05
Phosphorous (total)	NA-22
Particulate Matter <= 10 microns (PM ₁₀)	NA-M09
Particulate Matter <= 2.5 microns (PM _{2.5})	NA-M10

This TRA Plan Summary has been created for the 2016 operations as the NPRI threshold reporting quantities for Cobalt were reduced for the 2016 reporting year and the quantity used at the Floradale site met the reporting value. This is the first year that the site met the reporting threshold, due to the reduced reporting quantity and not specifically the production quantity.

CERTIFICATION OF HIGHEST RANKING EMPLOYEE

As of 22 December 2017, I, Craig Schwindt, 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 complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Cobalt (and its compounds)	NA-05
Phosphorous (total)	NA-22
Particulate Matter <= 10 microns (PM ₁₀)	NA-M09
Particulate Matter <= 2.5 microns (PM _{2.5})	NA-M10



Craig Schwindt
President
Floradale Feed Mill Limited

CERTIFICATION OF LICENSED PLANNER

As of 22 December 2017, I, Beth Rhyno, certify that I am familiar with the processes at the Floradale Feed Mill Ltd. facility, that use or create 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 plan dated Dec 20, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Cobalt (and its compounds)	NA-05
Phosphorous (total)	NA-22
Particulate Matter <= 10 microns (PM ₁₀)	NA-M09
Particulate Matter <= 2.5 microns (PM _{2.5})	NA-M10



Beth Rhyno, P.Eng.
Licensed Toxic Reduction Planner (Ontario): License Number TSRP0273
Senior Environmental Engineer
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