

Appendix B TRA Plan Summary

Basic Facility Information

Name & CAS # of Substance	Particulate Matter $\leq 10\mu\text{m}$ Particulate Matter $\leq 2.5\mu\text{m}$	NA-M09 NA-M10
Substances for which other Plans have been prepared	N/A	N/A

Facility Identification and Site Address

Company Name	Masterfeeds Inc.	
Facility Name	Cavan	
Facility Address	Physical Address: 1043 County Road 10 Cavan, Ontario L0A 1C0	Mailing Address: (if different)
Spatial Coordination of Facility	702606 N 4896195 E; Zone 17	
Number of Employees	19	
NPRI ID	10480	
Ontario MOECC ID Number	N/A	

Parent Company (PC) Information

PC Name & Address	Alltech Canada Inc. 20 Cutten Place Guelph, Ontario N1G 4Z7
Percent Ownership for each PC	100%
Business Number for PC	
Primary North American Industrial Classification System Code (NAICS)	
2 Digit NAICS Code	31 – Manufacturing
4 Digit NAICS Code	3111 – Animal Food Manufacturing
6 Digit NAICS Code	311119 – Other Animal Food Manufacturing

Company Contact Information		
Facility Public Contact	Bill Kitmer Director of Operations bkitmer@masterfeeds.com Phone: 519 685-4300 x1225 Fax: 519 685-9410	Masterfeeds Inc. 1020 Hargrave Road London, Ontario N6E 1P5
Facility Technical Contact	Larry Mann Operations Manager lmann@masterfeeds.com Phone: 705 944-5611 Fax: 705 944-8981	Same as facility address
Company Coordinator Contact	Same as Facility Public Contact	
Person who Prepared the Plan: (if different from the Coordinator)	Erik Martinez Environmental Consultant Planner License No. TSRP0005 Erik.Martinez@GHD.com Phone: 519- 884-0510 x2342	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
Highest Ranking Employee	Larry Mann Operations Manager lmann@masterfeeds.com Phone: 705 944-5611 Fax: 705 944-8981	Same as facility address
Planner Information:		
Planner Responsible for Making Recommendations	Erik Martinez, P.Eng. Environmental Consultant Planner License No. TSRP0005 Erik.Martinez@GHD.com Phone: 519- 884-0510 x2342	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
Planner Responsible for Certification	(same as planner responsible for making recommendations)	

Toxic Reduction Policy Statement of Intent

Masterfeeds Inc. (Masterfeeds) Cavan facility (Facility) creates particulate matter with a diameter less than 2.5 µm (PM-2.5) and particulate matter with a diameter less than 10 µm (PM-10) in its processes. The Facility does not intend to reduce the creation of these toxic substances at the Facility. Masterfeeds does not use PM-2.5 or PM-10; therefore this Toxic Substance Reduction Plan (Plan) will not address reducing their use.

Reduction Objectives

Masterfeeds manufactures animal feed at their Cavan facility in an environmentally responsible manner. Masterfeeds' manufacturing operations have been optimized to minimize the use of raw materials. Masterfeeds will strive to reduce the creation of PM-2.5 and PM-10 at the Facility in the future should an option become available.

The objective of this Plan is to identify potential reduction options and assess the technical and economic feasibility of each option to reduce the creation of PM-2.5 and PM-10 at the Facility, and determine which options, if any, are viable for implementation at this time.

Description of Facility

Masterfeeds operates an animal feed manufacturing facility where they receive, clean, dry, mix, store, and ship a variety of raw materials such as corn, soya, canola, wheat, barley, and oats.

The raw materials are received at the Facility by truck and are unloaded into a receiving pit. A natural gas-fired boiler is used to add heat and moisture to the grain during processing. Processing of the raw materials includes separating, milleting, cooling, pelletizing, and mixing. The final animal feed product is gravity fed through a loading spout onto trucks for shipping to customers.

Toxic Substance Reduction Options

After looking into the seven categories of toxic substance reduction options, no options were identified. Explanations are provided in the table below to detail why an option could not be identified in each category.

Toxic Substance Reduction Category	Option: Identification and Description
1) Materials or feedstock substitution	No option identified: PM-2.5 and PM-10 are not contained in the raw material used for processes at the Facility. Emissions are created through the various processing operations. Substituting raw materials would not reduce the amount of PM created.
2) Product design or reformulation	No option identified: Changes in the product design will not affect the process creating PM-2.5 or PM-10; therefore, no options have been identified for the category at this time.
3) Equipment or Process Modification	No option identified: The Facility equipment and manufacturing processes are currently optimized to produce final products that meet client specifications. Masterfeeds conducts regular preventative maintenance on all equipment to ensure it is operating efficiently. Process modifications are not possible.
4) Spill and Leak prevention	No option identified: There are no spills or leaks of PM-2.5 or PM-10 that could occur at Masterfeeds. Spill and leak prevention is not a concern and an option cannot be identified in this category that would result in a reduction of PM-2.5 or PM-10 created or released to air.

Toxic Substance Reduction Category	Option: Identification and Description
5) On-site reuse or recycling	No option identified: PM-2.5 & PM-10 are only emitted as an air emission once created, and as such, cannot be reused or recycled; therefore no options for reduction in this category could be identified.
6) Improve inventory management or purchasing techniques	No option identified: The air emissions of PM-2.5 & PM-10 have no relation to inventory management or purchasing techniques; therefore no options for reduction in this category could be identified.
7) Training or improved operating practices	No option identified: Masterfeeds currently has standard operating procedures and practices in place at the Facility. All employees are trained on the facility procedures and practices, as well as on the efficient use of process equipment. Operating practices and training procedures are reviewed and updated as necessary and area for improvement will continue to be evaluated on a regular basis; therefore, no options have been identified for the category at this time.

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for the creation of PM10 and PM2.5.

Certification by Highest Ranking Employee

Attached.

Certification by Licensed Planner

Attached.

2. Plan Certifications

Certification by Highest Ranking Employee

As of May 2, 2016, I, Larry Mann certify that I have read the toxic substance reduction plan for the toxic substances 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.

[PM-2.5]

[PM-10]



Larry Mann
Operations Manager
Masterfeeds Inc.

Date

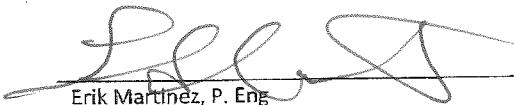


Certification by Licensed Planner

As of May 2, 2016, I, Erik Martinez, certify that I am familiar with the processes at Masterfeeds that use the toxic substances 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 May 2016 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act, with the exception of subsection 11.1(2) since the plan was not dated prior to December 31, 2013.

[PM-2.5]

[PM-10]



Erik Martinez, P. Eng
Licensed Toxic Reduction Planner, License # TSRP0005
GHD Limited

Date

