TRA PLAN SUMMARY – PM10

Basic Facility Information

Name & CAS # of Substance	PM10	N/A
Substance for which other Plans have been prepared	PM2.5	N/A
Facility Identification and Site Address		
Company Name	Blommer Chocolate Company of Canada	
Facility Name	Blommer Chocolate – Campbellford	
Facility Address	103 Second Street Campbellford Ontario	
Spatial Coordination of Facility	276962 Easterly 4909460 Northerly	
Number of Employees	131	
NPRI ID	27694	
Parent Company (PC) Information		
PC Name & Address **Percent Ownership for each PC**	**Blommer Chocolate** 600 West Kinzie Chicago, Illinois USA **100%**	
Business Number for PC	802741678	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 – Manufacturing	
4 Digit NAICS Code	3113 – Sugar and Confectionery Product Manufacturing	
6 Digit NAICS Code	311320 – Chocolate and Confectionery Manufacturing	
Company Contact Information		
Facility Public Contact	Robert Taylor, Process Manager 705-653-5821 ext. 2802	Same as Facility address

	rtaylor@blommer.com	
Facility Technical Contact:	Robert Taylor, Process Manager 705-653-5821 ext. 2802 rtaylor@blommer.com	Same as Facility address
Person who Prepared the Plan: (if different from the Coordinator)	Slavi Grozev sgrozev@craworld.com Phone: (519) 884-0510 ext. 2283 Fax: (519) 884-0525	Conestoga-Rovers & Associates Ltd. 184 Front Street East Toronto, ON M5A 4N3
Highest Ranking Employee	Robert Taylor, Process Manager 705-653-5821 ext. 2802 rtaylor@blommer.com	Same as Facility address
Planner Information:		
Planner Responsible for Making Recommendations	Erik Martinez, P. Eng. Planner License No. TSRP0005 emartinez@craworld.com Phone: (519)884-0510 ext. 2342	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2
Planner Responsible for Certification	Erik Martinez, P. Eng. Planner License No. TSRP0005 emartinez@craworld.com Phone: (519)884-0510 ext. 2342	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2

Toxic Reduction Policy Statement of Intent

Blommer Chocolate Company of Canada (Blommer) creates Particulate Matter <10 µm (PM10) in six processes. Blommer does not intend to reduce the creation of this toxic substance at the Facility.

Reduction Objectives

Blommer produces high quality products in an environmentally responsible manner. Blommer's manufacturing operation has been optimized to minimize the use of raw materials. Blommer will strive to reduce the creation of PM10 at the Facility in the future should an option become available.

Description of Facility

The Blommer Facility manufactures chocolate products from raw cocoa beans. The Facility primarily uses raw cocoa beans, oils/fats, milk powder, sugar and additives that are roasted, milled and blended to produce chocolate products before being packaged and shipped to customers.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 311320 – Chocolate and Confectionary Manufacturing from Cacao Beans.

Toxic Substance Reduction Options to be Implemented

After looking into the seven categories of toxic substance reduction options, no options were identified. An explanation of why no option is available is provided in the table below.

Toxic Substance Reduction Category	*Option: Identification and Description*
1) Materials or feedstock substitution	**No option identified:** The Blommer Facility uses specific quantities of ingredients to manufacture final products with the desired properties. Substituting these products would compromise the product characteristics and quality of the products and therefore would require extensive testing and analysis from the Research and Development Department. Material or feedstock substitutions are not currently possible for Blommer's production.
2) Product design or reformulation	**No option identified:** The Facility's formulation for the production of goods is based on past research, trialing and analysis used to create products which appeal to their customers. A change to the product design or reformulation is not possible under the current conditions at the Facility.
3) Equipment or Process Modification	**No option identified:** The existing dust collectors and cooling towers operate at specific set parameters to produce enough chilled water and handle the particulate matter released through process. Therefore, there are no process modifications options available at this point. As a result, equipment or process modifications aimed to reduce the use of PM10 are not possible.

Toxic Substance Reduction Category	*Option: Identification and Description*
4) Spill and Leak prevention	**No option identified:** The dust collectors and cooling towers have maintenance schedules that ensure efficient operation and avoidance of spills or leaks. The Facility is already doing everything possible to reduce the creation and release of PM10.
5) On-site reuse or recycling	**No option identified:** The PM10 that is created in the dust collectors and through water releases via the cooling towers cannot be reused in the manufacturing process or recycled. Therefore, no options were identified.
6) Improve inventory management or purchasing techniques	**No option identified:** The production schedule is known in advance, therefore very little surplus storage exists at the Facility. In addition, freshness matters to Blommer's customers, therefore, materials cannot be kept on site for extended periods of time. The Facility is unable to identify a reduction option related to improved inventory management or purchasing techniques, as they are already doing everything possible in this category.
7) Training or improved operating practices	**No option identified:** The staff is trained to inspect and monitor process operations to ensure all process equipment is operating properly. Equipment maintenance programs and training on Standard Operating Procedures (SOPs) to ensure efficient operating practices. Even if there is potential for the implementation of further training for the floor workers, the creation of PM10 will not be reduced due to the continual operation of the manufacturing process.

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for PM10.

Certification by Highest Ranking Employee

Attached.

Certification by Licensed Planner

Attached.

Section 2.0 Plan Certifications

Certification by Highest Ranking Employee

As of December 23, 2014, I, Robert Taylor 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.

Particulate Matter 10µm
Particulate Matter 2.5µm

Robert Taylor
Process Manager
Blommer Chocolate Company

Certification by Licensed Planner

As of December 23, 2014, I, Erik Martinez, certify that I am familiar with the processes at Blommer 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 December 2014 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Particulate Matter 10µm
Particulate Matter 2.5µm

Dec 30/14

Erik Martinez, P. Eng
Licensed Toxic Reduction Planner, License # TSRP0005
Conestoga-Rovers & Associates Limited