

## TRA PLAN SUMMARY – PM2.5

### Basic Facility Information

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

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

## Toxic Reduction Policy Statement of Intent

Blommer Chocolate Company of Canada (Blommer) creates Particulate Matter <2.5 µm (PM2.5) 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 PM2.5 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.

<i>Toxic Substance Reduction Category</i>	<i>Option: Identification and Description</i>
1) Materials or feedstock substitution	<b>No option identified:</b> 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	<b>No option identified:</b> 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	<b>No option identified:</b> 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

<b>Toxic Substance Reduction Category</b>	<b>Option: Identification and Description</b>
4) Spill and Leak prevention	this point. As a result, equipment or process modifications aimed to reduce the use of PM2.5 are not possible.
5) On-site reuse or recycling	<b>No option identified:</b> 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 PM2.5.
6) Improve inventory management or purchasing techniques	<b>No option identified:</b> The PM2.5 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.
7) Training or improved operating practices	<b>No option identified:</b> 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.
	<b>No option identified:</b> 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 PM2.5 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 PM2.5.

**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 10 $\mu$ m

Particulate Matter 2.5 $\mu$ m



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 10 $\mu$ m

Particulate Matter 2.5 $\mu$ m

  
Erik Martinez, P. Eng  
Dec 30/14

Licensed Toxic Reduction Planner, License # TSRP0005  
Conestoga-Rovers & Associates Limited