

TRA PLAN SUMMARY – PM2.5

Basic Facility Information

Name & CAS # of Substance	PM2.5	N/A
Substance for which other Plans have been prepared	PM10	N/A
Facility Identification and Site Address		
Company Name	Tri City Ready Mix Limited	
Facility Name	Tri City Ready Mix – Kitchener	
Facility Address	36 Manitou Drive Kitchener, Ontario N2C 1L3	
Spatial Coordination of Facility	544738.68 Easterly 4807057.95 Northerly	
Number of Employees	53	
NPRI ID	27987	
Parent Company (PC) Information		
PC Name & Address	NA	
Percent Ownership for each PC		
Business Number for PC	NA	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	32 - Manufacturing	
4 Digit NAICS Code	3273 - Cement and concrete product manufacturing	
6 Digit NAICS Code	327320 - Ready-mix concrete manufacturing	
Company Contact Information		
Facility Public Contact	Ron Esbaugh, President	Same as Facility address
	519-894-0900 ext. 223	
	ronesbaugh@tricityreaymix.com	
	Ron Esbaugh, President	Same as Facility address

Facility Technical Contact:	519-894-0900 ext. 223	
	ronesbaugh@tricityreaymix.com	
Person who Prepared the Plan: (if different from the Coordinator)	Slavi Grozev	Conestoga-Rovers & Associates Ltd.
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Highest Ranking Employee	Ron Esbaugh, President	Same as Facility address
	519-894-0900 ext. 223	
	ronesbaugh@tricityreaymix.com	
Planner Information:		
Planner Responsible for Making Recommendations	Erik Martinez, P. Eng.	Conestoga-Rovers & Associates Ltd.
	Planner License No. TSRP0005	651 Colby Drive
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Planner Responsible for Certification	Erik Martinez, P. Eng.	Conestoga-Rovers & Associates Ltd.
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	emartinez@croworld.com	Waterloo, ON
	Phone: (519)884-0510 ext. 2342	N2V 1C2

Toxic Reduction Policy Statement of Intent

Tri City Ready Mix Limited (Tri City) creates Particulate Matter <2.5 µm (PM2.5) in six processes. Tri City does not intend to reduce the creation of this toxic substance at the Facility.

Reduction Objectives

Tri City produces high quality products in an environmentally responsible manner. Tri City's manufacturing operation has been optimized to minimize the use of raw materials. Tri City will strive to reduce the creation of PM2.5 at the Facility in the future should an option become available.

Description of Facility

Tri City is a concrete ready-mix batching Facility. Cement powder is received from transport trucks to a storage silo. Aggregate materials are received directly from transport trucks into storage hoppers. Extra aggregate materials are stored in piles on the northeast end of the Facility. Batch mixture materials are gravity delivered to ready-mix trucks from storage vessels.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 327320 – “Ready Mix Concrete Producer and Supplier”.

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	No option identified: The Tri City 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 Tri City'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 equipment which produces PM2.5 operates at a specific set parameters to reduce the particulate matter released throughout the process. As a result, equipment or process modifications aimed to reduce the use of PM2.5 are not possible.
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

Toxic Substance Reduction Category

Option: Identification and Description

- 5) On-site reuse or recycling
- 6) Improve inventory management or purchasing techniques
- 7) Training or improved operating practices
- the creation and release of PM2.5.
- No option identified:** 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.
- No option identified:** The production schedule is known in advance, therefore very little surplus storage exists at the Facility. In addition, freshness matters to Tri City'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.
- 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 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.