

TRA ANNUAL SUMMARY
OPERATIONAL COMPARISON 2017-2018

BASIC FACILITY INFORMATION

Company Name: Wallenstein Feed & Supply Limited
Monkton Operations

Facility Address: 132 Maddison Street West
Monkton, Ontario
N0K 1P0

Contact Information: Craig Foster
Operations Manager
519-669-5143
craigfosterl@wfs.ca

Certifying Official: Craig Foster
Operations Manager
519-669-5143
craigfoster@wfs.ca

Parent Company: Wallenstein Feed & Supply Limited
100% ownership

UTM Locator (NAD83): Zone - 17
493362E; 4826005N

The facility's NPRI ID: 10904

In 2018, WFS-Monkton employed about 15 full time employees (equivalent)

The NAICS codes applicable to the facility are:

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

TOXIC REDUCTION STRATEGY STATEMENT OF INTENT

WFS-Monkton does not intend to reduce the amount of copper, manganese, selenium, zinc, cobalt or phosphorous used in its production of animal feed pre-mixes as it is optimized for animal health and growth. Additionally there are no options at this time to reduce the creation of the particulate matter (PM₁₀ or PM_{2.5}) that results from the handling and processing of the bulk dry feed ingredients.

However as WFS-Monkton is committed to protecting the environment, wherever feasible, the reduction of phosphorous as well as particulate matter from production activities 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 WFS-Monkton operations are primary ingredients in our feed pre-mixes to improve and maintain the health of animals. An additional effort is also ongoing at the facility to reduce the discharge and disposal of copper, manganese, selenium, zinc, cobalt and phosphorous as well as the particulate matter created as a by-product of production as this is not only environmentally responsible operations it also indicates improved efficiencies in our processing operations.

Wallenstein Feed & Supply Ltd. 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 WFS-Monkton will be involved in the reduction of toxic substance use, creation and releases. Copper, manganese, selenium, zinc, cobalt and phosphorous are the priority substance identified in this planning for the reduction associated with off-specification feed formulations and ultimate disposal of toxic containing materials. WFS-Monkton's goal is to continue to reduce the amount of feed pre-mix disposed of that contain the phosphorous compound where technically and economically feasible. Wallenstein Feed & Supply Ltd. 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 WFS-Monkton's feed pre-mix formulation as it is granted approval by the appropriate governing bodies and found to be an economically viable alternative. All production activities that have the potential to create particulate matter as a by-product has implemented Best Management practices and enhanced controls where technically and economically feasible. Therefore, there are no options being implemented at this time.

TOXIC SUBSTANCES

Eight (8) substances were required to be tracked, quantified and reported for under TRA requirements for the 2018 operational year. These substances are Copper, Manganese, Zinc, Selenium, Phosphorous, Cobalt, PM10, and PM2.5.

The eight (8) substances were reported to the Ministry of the Environment, Conservation and Parks (MECP) under O. Reg. 455/09 through SWIM.

TRACKING AND QUANTIFICATIONS

The method used to calculate the TRA quantifications was a mass balance approach based on purchase records and emission estimates were based on published AP-42 emission factors. This is the best available method as there is no site specific monitoring data available.

Table 1 is a summary of reported TRA quantities for the 2018 operational year. When compared to the last reported values, an increase can be seen in the use of all substances except Selenium. These changes are due to the increase in overall production of animal feed at the facility and changes to feed formulations.

In the 2018 operational year, there were no out of the ordinary incidents or significant process changes at the facility.

Table 1: Comparison of Quantities Reported

| CAS | Substance | Description of Processes that Use or Create Substance | Reporting under NPRI Part | NPRI Threshold (tonnes) | 2018 Used (tonnes) | Used 2017 - Last Reported Value | % Change | 2018 Created (tonnes) | Created 2017 - Last Reported Value | % Change | 2018 Contained In Product (tonnes) | Contained in Product 2017- Last Reported Value | % Change | Reason for Changes |
|--------|-------------------------------|---|---------------------------|-------------------------|--------------------|---------------------------------|----------|-----------------------|------------------------------------|----------|------------------------------------|--|----------|-----------------------|
| NA-06 | Copper (and its compounds) | Used as a formulation component | Part 1 | 10 (MPO) | >10-100 | >10-100 | 2.49% | 0.00 | 0.00 | 0.00% | >10-100 | >10-100 | 2.49% | No Significant Change |
| NA-09 | Manganese (and its compounds) | Used as a formulation component | Part 1 | 10 (MPO) | >10-100 | >10-100 | 1.43% | 0.00 | 0.00 | 0.00% | >10-100 | >10-100 | 1.43% | No Significant Change |
| NA-14 | Zinc (and its compounds) | Used as a formulation component | Part 1 | 10 (MPO) | >10-100 | >10-100 | 2.76% | 0.00 | 0.00 | 0.00% | >10-100 | >10-100 | 2.76% | No Significant Change |
| NA-12 | Selenium (and its compounds) | Used as a formulation component | Part 1 | 0.100 (MPO) | >0.100-10 | >0.100-10 | 40.26% | 0.00 | 0.00 | 0.00% | >0.100-10 | >0.100-10 | 40.26% | Formulation Changes |
| NA-22 | Phosphorous (total) | Used as a formulation component | Part 1 | 10 (MPO) | >100-1000 | >100-1000 | 0.54% | 0.00 | 0.00 | 0.00% | >100-1000 | >100-1000 | 0.54% | No Significant Change |
| NA-05 | Cobalt (and its compounds) | Used as a formulation component | Part 1B | 0.05 (MPO) | >0.100-10 | >0.100-10 | 10.32% | 0.00 | 0.00 | 0.00% | >0.100-10 | >0.100-10 | 10.32% | Formulation Changes |
| NA-M10 | PM2.5 - Particulate Matter | Grain Processing, Supporting Operations | Part 4 | 0.3 (Release) | 0.00 | 0.00 | 0.00% | >1-10 | >1-10 | 1.03% | 0.00 | 0.00 | 0.00% | No significant change |
| NA-M09 | PM10 - Particulate Matter | Grain Processing, Supporting Operations | Part 4 | 0.5 (Release) | 0.00 | 0.00 | 0.00% | >1-10 | >1-10 | 1.03% | 0.00 | 0.00 | 0.00% | No significant change |

COMPARISON OF TRACKING AND QUANTIFICATION

No changes were made in the quantification and tracking methodology from 2017 to 2018.

DESCRIPTION OF STEPS TAKEN TO ACHIEVE OBJECTIVE AND ASSESS EFFECTIVENESS

There was no technologically feasible reduction strategy objectives identified for the Monkton facility and as such there was no economic feasibility study completed for the eight (8) prescribed substances.

There are no objectives to track or reduction targets to evaluate.

Table 2 provides a summary of the facility TRA changes and updates which took place in 2018.

Table 2: Changes in Quantifications, Quantities and Plan Updates

| CAS | Substance | Quantification Method(s) Used | Change in Quantification Method Used | Rationale for Using Selected Method(s) | Incidents out of the Ordinary | Significant Process Change | Objectives, Descriptions, Targets | Actions | Amendments |
|--------|-------------------------------|-------------------------------|--------------------------------------|--|-------------------------------|----------------------------|--|---------|------------|
| NA-06 | Copper (and its compounds) | Mass Balance/Emission Factors | No change | No site specific monitoring data available | No | No | No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation. | None | None |
| NA-09 | Manganese (and its compounds) | Mass Balance/Emission Factors | No change | No site specific monitoring data available | No | No | No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation. | None | None |
| NA-14 | Zinc (and its compounds) | Mass Balance/Emission Factors | No change | No site specific monitoring data available | No | No | No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation. | None | None |
| NA-12 | Selenium (and its compounds) | Mass Balance/Emission Factors | No change | No site specific monitoring data available | No | No | No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation. | None | None |
| NA-22 | Phosphorous (total) | Mass Balance/Emission Factors | No change | No site specific monitoring data available | No | No | No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation. | None | None |
| NA-05 | Cobalt (and its compounds) | Mass Balance/Emission Factors | No change | No site specific monitoring data available | No | No | No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation. | None | None |
| NA-M10 | PM2.5 - Particulate Matter | Mass Balance/Emission Factors | No change | No site specific monitoring data available | No | No | No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation. | None | None |
| NA-M09 | PM10 - Particulate Matter | Mass Balance/Emission Factors | No change | No site specific monitoring data available | No | No | No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation. | None | None |

CERTIFICATION OF HIGHEST RANKING EMPLOYEE

As of 30 December 2013, I, Vicky Hammell, 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, with the exception of the deadline, the plan meets all other requirements of the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Copper (and its compounds) NA-06
Manganese (and its compounds) NA-09
Selenium (and its compounds) NA-12
Zinc (and its compounds) NA-14

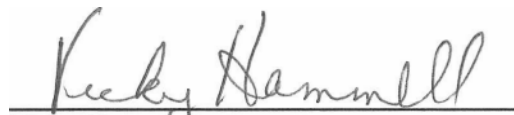


Vicky Hammell
Operations Manager
Wallenstein Feed & Supply Ltd.

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Phosphorous (total) NA-22
Particulate Matter <= 10 microns (PM₁₀) NA-M09
Particulate Matter <= 2.5 microns (PM_{2.5}) NA-M10

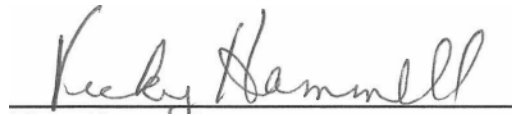


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| | |
|--|--------|
| Cobalt | NA-05 |
| Added to the existing Plan for: | |
| Phosphorous (total) | NA-22 |
| Particulate Matter <= 10 microns (PM ₁₀) | NA-M09 |
| Particulate Matter <= 2.5 microns (PM _{2.5}) | NA-M10 |



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Operations Manager
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