



PLAN SUMMARY

2012 REPORTING YEAR

Pioneer Construction Inc.

**FACILITY: Kenora Aggregate Operation &
Hot Mix Asphalt Plant**

991 Homestake Rd.

Kenora, ON P9N 3W8

March 2014

PLAN SUMMARY

FACILITY: KENORA AGGREGATE OPERATION & HOT MIX ASPHALT PLANT

This Plan Summary has been prepared in accordance with the Toxics Reduction Act (O.Reg 455/09), and satisfies the Plan Summary content requirements.

BASIC FACILITY INFORMATION

KENORA AGGREGATE OPERATION AND HOT MIX ASPHALT PLANT

Substance Names	PM10, PM2.5 and NO2
CAS Registry # PM10 & PM2.5	NA
CAS Registry # NO2	11104-93-1
National Pollutant Release Inventory (NPRI) ID#	10046
MOE REG. 127/01 ID#	10623
Legal Name of Owner/Operator of Facility	Pioneer Construction Inc.
Street Address	1 Ceasar Rd. Sudbury, ON P3E 5P3
Mailing Address	Same As Above
No. Full-Time Employee Equivalents	4
NAICS Code (2 and 4 digit)	
NAICS Canada Code - Primary	212315
NAICS Canada Code – Secondary	324121
Public Contact	Malcolm Croskery Sudbury General Manager (705) 560-7200 1 Ceasar Rd. Sudbury, ON P3E 5P3
UTM Coordinates (NAD 83)	15T 399978E 5514275N

LIST OF OTHER SUBSTANCES FOR WHICH PLANS HAVE BEEN PREPARED AT THE FACILITY

The facility has prepared Toxic Substance Reduction Plans for the following prescribed toxic substances:

- PM10
- PM2.5
- NO2

STATEMENT OF INTENT

The nature of particulate matter is such that it cannot be used but is created. Therefore due to this inherent property, PM10 & 2.5 cannot be "used" in the facility processes at the subject facility; and

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so a statement with respect to intent to reduce their "use" is not required, and this plan will not address reducing use of PM10 & PM2.5.

Oxides of Nitrogen (NO₂) are also not "used" at the subject facility, but are created as a by-product of fuel combustion. Therefore a statement with respect to intent to reduce the "use" of NO₂ is not required, and this plan will also not address reducing their use.

PM10 and PM2.5 are "created" at the subject facility through physical means, and are released as stack or fugitive emissions, as dust. The creation of "dust" at the subject facility is an unavoidable by-product of the facility's production processes and is inherent in the very nature of facility production. The activities which lead to the release of suspended particulate matter are essential and unavoidable. Dust control and reduction measures such as applying a water spray during crushing/handling; watering roadways to reduce dust creation; and the use of dust control process equipment in the form of a dust recovery cyclone and baghouse attached to the asphalt plant; are already in use at the subject facility.

Particulate matter and oxides of nitrogen (NO₂) are also "created" at the subject facility during fuel combustion in stationary equipment. The subject facility uses fuel oil for asphalt production, and local heating; and diesel generators are used to power crushing equipment during aggregate production. Stationary combustion equipment is already maintained regularly at the subject facility in order to optimize operational efficiency, and reduce fuel consumption rates; which in turn reduces PM and NO₂ creation.

The subject facility currently operates according to Industry Best Practices, and complies with all existent regulatory requirements, including the Environmental Protection Act (O.Reg 419/05), National Pollutant Release Inventory, and O. Reg 127/01.

The seven categories for toxic substance reduction have been considered, and an explanation as to why each category is inapplicable or already previously optimized, provided. No toxic substance reduction options have been identified.

Therefore due to the reasons stated above, it is the Facility's position that the control of the "creation" and subsequent release of PM10, PM2.5 and NO₂ has already been optimized to the greatest extent that can be reasonably expected. Should further reasonable control measures become apparent; the subject facility would take these into consideration; however, at this time the subject facility does not intend to further reduce the creation of PM10, PM2.5 or NO₂.

OBJECTIVES/OPTIONAL TARGETS

The objectives of this plan are to:

- Satisfy the requirements of the Toxics Reduction Act (O.Reg 455/09)
- Provide the reader with information on the measures that are currently in place at the subject facility which control the "creation" and subsequent release of particulate matter; and NO₂;
- Provide support for the subject facility's position with respect to the Statement of Intent of this plan

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WHY TOXIC SUBSTANCE IS USED AND/OR CREATED

The nature of Particulate Matter is such that it cannot be used and is only created. Therefore no PM is used at the subject facility, but particulate matter is created.

Oxides of Nitrogen (NO₂) are also not “used” at the subject facility, but are created as a by-product of fuel combustion.

PM10 and PM2.5 are “created” at the subject facility through physical means, and are released as stack or fugitive emissions, as dust. The creation of “dust” at the subject facility is an unavoidable by-product of the facility’s production processes and is inherent in the very nature of facility production. The activities which lead to the release of suspended particulate matter are essential and unavoidable. Dust control and reduction measures such as applying a water spray during crushing/handling; watering roadways to reduce dust creation; and the use of dust control process equipment in the form of a dust recovery cyclone and baghouse attached to the asphalt plant; are already in use at the subject facility.

Particulate matter and oxides of nitrogen (NO₂) are also “created” at the subject facility during fuel combustion in stationary equipment. The subject facility uses fuel oil for asphalt production, and local heating; and diesel generators are used to power crushing equipment during aggregate production. Stationary combustion equipment is already maintained regularly at the subject facility in order to optimize operational efficiency, and reduce fuel consumptions rates; which in turn reduces PM and NO₂ creation.

RATIONALE FOR NOT IMPLEMENTING TOXIC SUBSTANCE REDUCTION OPTIONS

The seven categories for toxic substance reduction have been considered, and an explanation as to why each category is inapplicable or already previously optimized, provided. No reduction options were identified at the present time.

Therefore it is the facility’s position that the overall reduction in the ¹creation, and release of particulate matter and oxides of nitrogen has already been optimized at the subject facility to the greatest extent that can be reasonably expected; and so no further toxic substance reduction options could be identified. Therefore no toxic substance reduction option can be implemented.

STATEMENT THAT PLAN SUMMARY ACCURATELY REFLECTS THE PLAN

This Plan Summary accurately reflects the current version of the Plan.

¹ Due to the nature of Particulate Matter, “Use”, “Contained in Product”, and “Disposal” are no applicable



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CERTIFICATION

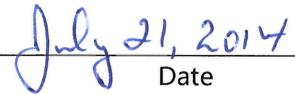
As of July 15, 2014, I, Fred Hakala, certify that I have read the toxic substance reduction plan for the toxic substances referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and with the exception of the regulatory deadline, complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

The December 31st deadline was not met, because facility administration only became aware of the requirement to report after the deadline had already passed.

Master Document Toxic Substance Reduction Plans, PM10, PM2.5 & NO2 (dated March 2014)
PM10 (dated March 2014)
PM2.5 (dated March 2014)
NO2 (dated March 2014)



Fred Hakala
Kenora/Thunder Bay General Manager
Pioneer Construction Inc.



Date

The following Planner Certification Statement which is made under s.19.1(4) of Ontario Regulation O.Reg 455/09 (as amended by s.11 of O.Reg 214/11) satisfies the Planner Certification requirements for the Plans that are assembled as a single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated on the Certification Statement:

As of July 15, 2014, I, Jessica Howard-Sheppard certify that I am familiar with the processes at the aggregate and hot mix asphalt Pioneer Construction Inc. facilities located at 991 Homestake Rd., in Kenora, ON, that use or create 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 March 2014, and that with the exception of the regulatory deadline, the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Master Document Toxic Substance Reduction Plans, PM10, PM2.5 & NO2 (dated March 2014)
PM10 (dated March 2014)
PM2.5 (dated March 2014)
NO2 (dated March 2014)

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Jessica Howard-Sheppard

July 15/14

Jessica Howard-Sheppard, B.A.Sc., EIT
Coordinator, Aggregates & Environment
Toxic Substance Reduction Planner
License #: TSRP0298
Pioneer Construction Inc.

Date



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PLANNER LICENSE NUMBER

As required by the TRA (O.Reg 455/09) the Licensed Toxic Substance Reduction Planner responsible for providing recommendations and certifying this Plan is:

Jessica Howard-Sheppard, BSc, EIT
Coordinator, Aggregates & Environment
Pioneer Construction Inc.
Toxic Substance Reduction Planner License # TSRP0298