

## **PLAN SUMMARY**

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Pioneer Construction Inc.  
**FACILITY: Sudbury, Skead Rd. Aggregate  
Operation & Hot Mix Asphalt Plant**  
**2340 Skead Rd.**  
**Garson, ON**

**March 2014**

PLAN SUMMARY  
FACILITY: SUDBURY, SKEAD RD. 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

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### SUDBURY, SKEAD RD. AGGREGATE OPERATION AND HOT MIX ASPHALT PLANT

Substance Names	PM10, PM2.5
CAS Registry #	NA
National Pollutant Release Inventory (NPRI) ID#	11245
MOE REG. 127/01 ID#	6062
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	2
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)	17T 0515002E 05161955N

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

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

- PM10
- PM2.5

## STATEMENT OF INTENT

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



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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 is also "created" at the subject facility during fuel combustion in stationary equipment. The subject facility uses natural gas 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 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 and 2.5 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 and 2.5.

## OBJECTIVES/OPTIONAL TARGETS

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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
- Provide support for the subject facility's position with respect to the Statement of Intent of this plan

## WHY TOXIC SUBSTANCE IS USED AND/OR CREATED

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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.

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### RATIONALE FOR NOT IMPLEMENTING TOXIC SUBSTANCE REDUCTION OPTIONS

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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.

Therefore it is the facility’s position that the overall reduction in the creation, and release of particulate matter has already been optimized at the subject facility. 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

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

### CERTIFICATION

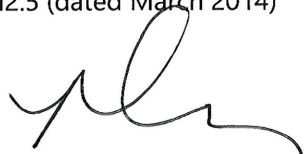
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As of July 15, 2014, I, Malcolm Croskery, certify that I have read the toxic substance reduction plan for the toxic substances referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and with the exception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

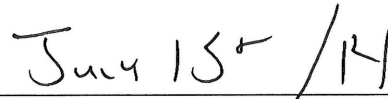
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The December 31<sup>st</sup> deadline was not met, because facility administration only became aware of the requirement to report after the deadline had already passed.

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



Malcolm Croskery  
Sudbury Area General Manager  
Pioneer Construction Inc.

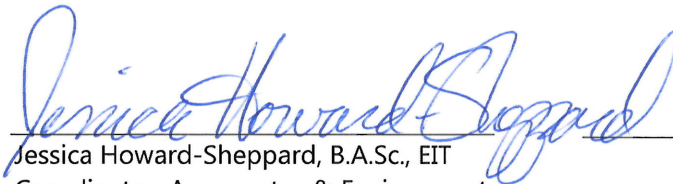


Date

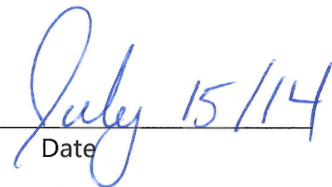
The following Planner Certification Statement which is made under s.19.1(4) of Ontario Regulation O.Reg 455/09 (as amended by s.11 of O.Reg 214/11) satisfies the Planner Certification requirements for the Plans that are assembled as a single document as of the date of this Certification Statement. Furthermore, 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 Pioneer Construction Inc. aggregate and hot mix asphalt facilities located at 2340 Skead Rd. in Garson, 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 (dated March 2014)  
PM10 (dated March 2014)  
PM2.5 (dated March 2014)



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**

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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