

TRA ANNUAL SUMMARY
OPERATIONAL COMPARISON 2015-2016

BASIC FACILITY INFORMATION

Company Name: Nestle Canada Inc.

Contact Information:

Technical Contact: Brand Barber
Manager, Engineering Services
519-680-0400
Brand.barber@ca.nestle.com

Parent Company: Nestle Canada Inc.
100% ownership

Facility Address: 980 Wilton Grove Road
London, Ontario
N6A 6C5

UTM Locator (NAD83): Zone - 17
483648E; 4752927N

The facility's NPRI ID: 7182

In 2016, Nestle Canada Inc. – London facility, employed about 550 employees (350 full time and 200 seasonal).

The NAICS codes applicable to the facility are:

31	Manufacturing
3115	Dairy Product Manufacturing
311520	Ice Cream and Frozen Dessert Manufacturing

TOXIC REDUCTION STRATEGY STATEMENT OF INTENT

Nestle is committed to protecting the environment. Wherever feasible, we will eliminate the discharge of ammonia and particulate matter in full compliance with all federal and provincial regulations. Our employees are encouraged to participate in all types of reduction activities. The toxic substances associated with Nestle operations are associated with the production support and are not ingredients in the products. Reducing the discharge and disposal of these toxic substances will be an ongoing consideration at Nestle, in addition to being environmentally responsible it also indicates improved efficiencies in our processing operations. Options that are both technologically and economically viable will be implemented at our facility.

REDUCTION OBJECTIVES

Nestle does not intend to reduce the ammonia usage as majority of the ammonia is re-circulated within the refrigeration system. Any ammonia releases from the system are associated with purging which is a required practice. Should it be found that an improved method of removing the air from the system is developed that is technically feasible an economic evaluation will be undertaken.

Nestle does not intend to reduce the PM10 and PM2.5 created during the raw ingredient handling and cooling tower operations. Should it be found that a reduction in the creation of these substances can be achieved Nestle would undertake a technical feasibility study. If there are viable solutions then an economic evaluation would be completed. Nestle will continue to use the cooling towers for chilling but will continue to research other options as they become technically or economically available.

TOXIC SUBSTANCES

The TRA required tracking of all NPRI substances for the 2016 operational year. Three (3) substances were required to be tracked, quantified and reported for under TRA-Phase II. This included ammonia (total), PM2.5 and PM10. The three (3) substances were reported to the Ministry of the Environment and Climate Change 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, monitoring data and engineering calculations.

Table 1 is a summary of reported TRA quantities for the 2016 operational year.

Table 1: Comparison of Quantities Reported														
CAS	Substance	Description of Processes that Use or Create Substance	Reporting under NPRI Part	NPRI Threshold (tonnes)	2016 Used (tonnes)	Used 2015 - Last Reported Value	% Change	2016 Created (tonnes)	Created 2015 - Last Reported Value	% Change	2016 Contained In Product (tonnes)	Contained in Product 2015 - Last Reported Value	% Change	Reason for Changes
NA-16	Ammonia (total)	Refrigeration System	Part 1A	10 (MPO)	>10-100	>10-100	5.77%	0	0	N/A	0	0	N/A	No significant change
NA-M09	PM10	Cooling tower, natural gas combustion, dust collector	Part 4	0.5 (release)	0	0	N/A	>1-10	>1-10	3.46%	0	0	N/A	No significant change
NA-M10	PM2.5	Cooling tower, natural gas combustion, dust collector	Part 4	0.3 (release)	0	0	N/A	>1-10	>1-10	1.53%	0	0	N/A	No significant change

COMPARISON OF TRACKING AND QUANTIFICATION

No changes were made in the quantification and tracking methodology from 2015 to 2016.

DESCRIPTION OF STEPS TAKEN TO ACHIEVE OBJECTIVE AND ASSESS EFFECTIVENESS

There was no technologically feasible reduction strategy objectives identified for the Nestle facility and as such there was no economic feasibility study completed for the identified TRA 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 2016.

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-16	Ammonia (total)	Mass Balance/Purchase Records, Monitoring Data, Engineering Calculations	No change	Best 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	Engineering Calculations	No change	Best 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	Engineering Calculations	No change	Best 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 19 December 2013, I, Len van Norden, 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 complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Particulate Matter <= 10 Microns (PM₁₀) NA-M09
Particulate Matter <= 10 Microns (PM_{2.5}) NA-M10

Len van Norden
Factory Controller
Nestle Canada Inc.



CERTIFICATION OF HIGHEST RANKING EMPLOYEE

As of 19 December 2013, I, Len van Norden, 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 complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Ammonia (Total) NA-16

Len van Norden
Factory Controller
Nestle Canada Inc.