TRA ANNUAL SUMMARY

OPERATIONAL COMPARISON 2012-2013

BASIC FACILITY INFORMATION

Company Name: Conestoga Meat Packers Limited

Contact Information:

Technical Contact: Dan Schwartzentruber
Maintenance Manager
519-648-2506
dschwartzentruber@conestogameats.com

Facility Address: 313 Menno Street/RR2
Breslau, Ontario
N0B 1M0

UTM Locator (NAD83): Zone - 17
549281E; 4813601N

In 2013, Conestoga Meats Packaging Ltd. employed about 600 full time employees (equivalent).

The NAICS codes applicable to the facility are:

31 - Manufacturing
3116 – Animal Slaughtering and Processing
311611 – Animal (except poultry) Slaughtering

TOXIC REDUCTION STRATEGY STATEMENT OF INTENT

CMP does not intend to reduce the creation of ammonia or the nitrate ion as these substances are a by-product of processing live hogs. However, CMP is committed to protecting the environment and as feasible options for reducing the creation of ammonia and nitrate are developed it would be CMP's intent to implement in full compliance with all federal and provincial regulations. Our employees are encouraged to participate in all types of reduction activities. As the toxic substances associated with CMP operations are created as by-products from the processing and waste water activities any reduction their creation would not only be environmentally responsible it would also indicate improved efficiencies in our processing operations.

Options that are both technologically and economically viable will be implemented at our facility.

REDUCTION OBJECTIVES

Although CMP does not have the intention to reduce the quantity of ammonia and nitrate ions due to the fact that these substances are a direct by-product of live hog processing it is implementing an enhanced biological wastewater treatment system to reduce the quantities being discharged.

The creation of the toxic substances is directly proportional to the quantity of hogs being processed. As such the increase in hog processing capability at the plant will result in the creation of an increased amount of these substances.

TOXIC SUBSTANCES

The TRA required tracking of all NPRI substances for the 2013 operational year. Two (2) substances were required to be tracked, quantified and reported for under TRA-Phase II. This included ammonia (total) and nitrate (ion). The two (2) substances were reported to the Ministry of the Environment 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 2013 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)	2013 Used (tonnes)	Used 2012 - Last Reported Value	% Change	2013 Created (tonnes)	Created 2012 - Last Reported Value	% Change	2013 Contained In Product (tonnes)	Contained in Product 2012 - Last Reported Value	% Change	Reason for Changes
NA-16	Ammonia (total)	Poultry processing and wastewater treatment	Part 1A	10 (MPO)	>10-100	0	100	>10-100	>10-100	-4	0	0	N/A	Installed ammonia refrigeration system
NA-17	Nitrate Ion	Wastewater treatment	Part 1A	10 (MPO)	0	0	N/A	>10-100	>10-100	-18	0	0	N/A	No significant change

COMPARISION OF TRACKING AND QUANTIFICATION

No changes were made in the quantification and tracking methodology from 2012 to 2013.

DESCRIPTION OF STEPS TAKEN TO ACHIEVE OBJECTIVE AND ASSESS EFFECTIVNESS

There was no technologically feasible reduction strategy objectives identified for the CMP 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.

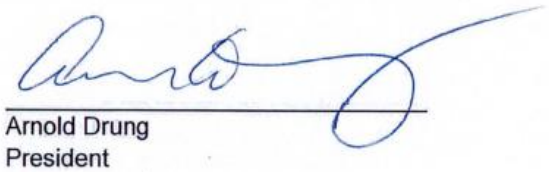
Table 2 provides a summary of the facility TRA changes and updates which took place in 2013.

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	Installed ammonia refrigeration system	No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation.	None	None
NA-17	Nitrate Ion	Mass Balance/Emission Factors	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, Arnold Drung, 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
Nitrate Ion	NA-17



Arnold Drung
President
Conestoga Meat Packers Limited