

**CARGILL LIMITED**  
**GUELPH BEEF DIVISION**  
165 DUNLOP DRIVE, GUELPH, ONTARIO N1L 1P4

**TOXICS REDUCTION ACT**  
**TOXIC SUBSTANCE REDUCTION PLAN SUMMARY**  
**2014**

REPORT PREPARED BY:  
*O2E Inc.*

REPORT PREPARED FOR:  
*CARGILL LIMITED*

O2E REF. NO. 13-179

DECEMBER 15, 2014

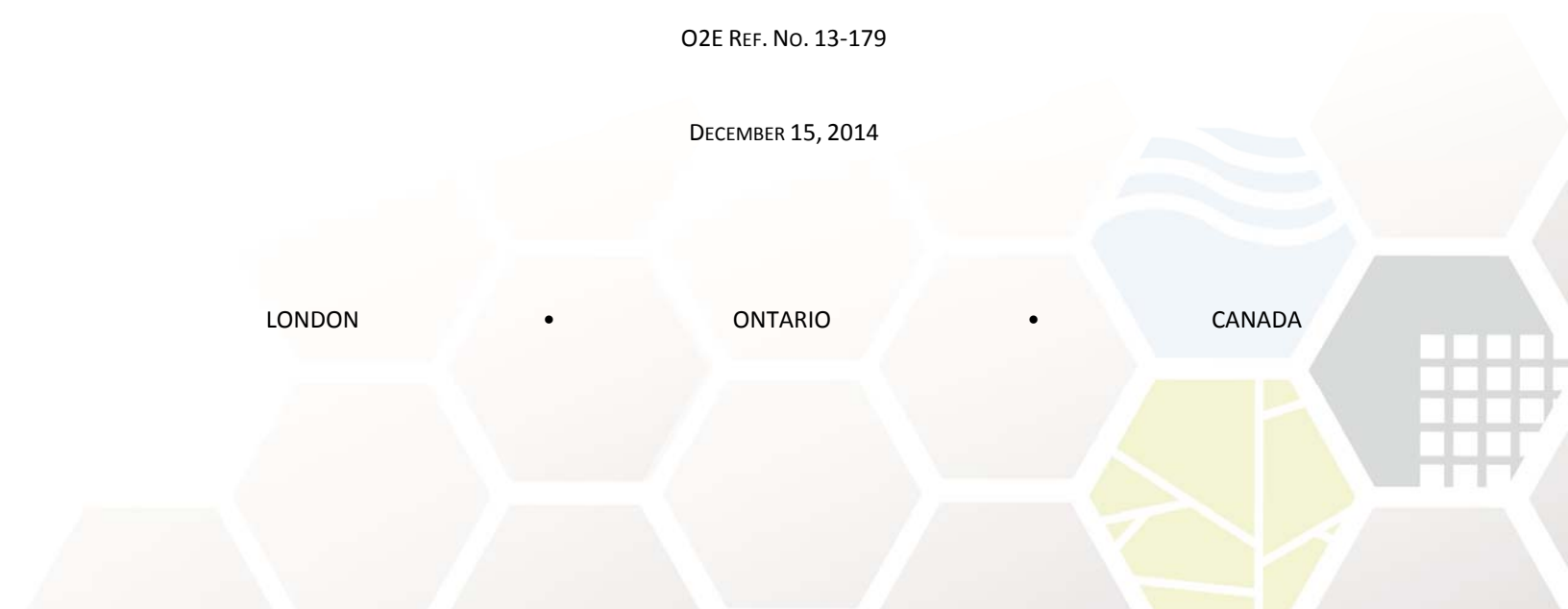
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## PLAN SUMMARY – SULPHURIC ACID

<b>Name and CASRN of Substance</b>	Sulphuric Acid	7664-93-9
<b>Substances for which other plans have been prepared</b>	Ammonia (Total) Particulate Matter $\leq 2.5$ microns (PM2.5) Particulate Matter $\leq 10$ microns (PM10)	NA-16 NA-10 NA-09

### 1.1 Basic Facility Information

Basic facility information has been included in Section 2 of this document.

### 1.2 Toxic Reduction Policy Statement of Intent

When Cargill began in 1865, their business was founded on the belief that “our word is our bond.” Today, as a diversified global company still grounded in a culture of trust and respect, this remains the standard by which they do business. Cargill operates with integrity and accountability. They are committed to feeding the world in a responsible way; reducing their environmental impact; and improving the communities where they live and work. Cargill is passionate about their goal to be the global leader in nourishing people and operate responsibly across the agricultural, food, industrial and financial markets they serve.

At Cargill, environmental stewardship is a part of everyday life. It is engrained in their way of thinking and doing business and is supported by employees at every level and location.

When it comes to environmental issues, Cargill believes in continuous improvement. While protection of our water, air, soil and vegetation is certainly paramount, maintaining the status quo is not enough. They are confident that, with increased innovation, creativity, and teamwork, it will be possible to revitalize our natural resources and surroundings.

Wherever feasible, Cargill will reduce the use and release of Sulphuric Acid in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Cargill, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

### 1.3 Reduction Objectives

The reduction of toxic substance use, creation and releases is a priority for Cargill forming part of their sustainability programs and EMS. Cargill's goal is to reduce the use of Sulphuric acid where technically and economically feasible by the timetable noted in the plan. They will achieve these reductions through a process modification by restricting the use of Sulphuric acid only to upset conditions. Cargill will also continue to explore new options as they arise as part of their sustainability programs related to the treatment of wastewater at the facility.

## 1.4 Toxic Substance Reduction Option to be Implemented

The following option has been identified for implementation to reduce the use and release of Sulphuric Acid

- Process Modification – restrict the use of Sulphuric acid to upset conditions

Sulphuric acid reductions due to implementing the options above are as follows:

Company Name: Cargill

Substance: Sulphuric acid

CASRN: 7664-93-9

Reduction Option: Process Modification

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	21.250	0	0	0	0	0	0	0	0
Projected Annual Usage	3.000	0	0	0	0	0	0	0	0
Reduction	18.250	0	0	0	0	0	0	0	0
% Reduction	86%	NA	NA	NA	NA	NA	NA	NA	NA

Note: All values are presented in metric tonnes (Mg) per year unless noted.

## 1.5 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Sulphuric Acid, dated December 15, 2014.

## 1.6 Copy of Plan Certification

A copy of the plan certification is presented in Section 3 of this document.

## 2. BASIC FACILITY INFORMATION

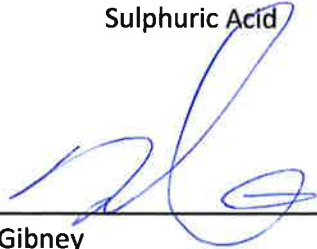
Facility Identification and Site Address		
Company Name	Cargill Limited	
Facility Name	Cargill Limited – Beef Division	
Facility Address	Physical Address:	Mailing Address:
	165 Dunlop Drive Guelph, ON N1L 1P4	165 Dunlop Drive Guelph, ON N1L 1P4
Spatial Coordinates (UTM)	564486.63 (Easting)	(Northing) 4822579.99
Datum	UTM 17	
Number of Employees	950 (Full time equivalents)	
NPRI ID	11105	
ON MOE ID	-	
Parent Company Information		
Parent Company Name & Address	Cargill Limited 165 Dunlop Drive Guelph, ON N1L 1P4	
Percent Ownership	100%	
CRA Business Number	100494855	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31	
4 Digit NAICS Code	3116	
6 Digit NAICS Code	311611	
Company Contact Information		
Facility Public Contact	Jyoti Bedi, EHS Professional	Contact Address:
	Jyoti_bedi@cargill.com	Cargill Limited
	Phone: (519)-823-5200 ex 319	165 Dunlop Drive
	Fax: (519)-823-5451	Guelph, ON N1L 1P4

### **Certification by the Highest Ranking Employee**

As of December 19, 2014, I, Matt Gibney, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Sulphuric Acid



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Matt Gibney  
General Manager  
Cargill Limited – Guelph Beef Division

### **Certification by Licensed Planner**

As of December 19, 2014, I, Tim Logan certify that I am familiar with the processes at Cargill's Guelph facility 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 plans dated December 15, 2014 and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Sulphuric Acid



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Tim Logan (License No. TSRP0003)  
President  
O2E Inc. Environmental Consultants