

**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

JULY 31, 2019

LONDON

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ONTARIO

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CANADA



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## 1. PLAN SUMMARY – PERACETIC ACID (AND ITS SALTS)

<b>Name and CASRN of Substance</b>	Peracetic Acid (and its salts)	79-21-0
<b>Substances for which other plans have been prepared</b>	Ammonia (total) Sulphuric Acid Particulate Matter ≤2.5 Microns Particulate Matter ≤10 Microns	NA-16 7664-93-9 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

Cargill strives to reduce the environmental impact of their global operations and help conserve natural resources. They comply with all environmental laws and their own strict requirements and continuously improve their performance through waste minimization, efficient resource use and other measures relevant to their businesses.

Eco-citizenship is an integral part of Cargill's corporate ethics. They strive to use natural resources efficiently and respect the environment by minimizing waste generation and impacts on the air, water and land. Peracetic Acid is an essential ingredient of the meat carcass antimicrobial agents used by the facility to ensure food safety and is an FDA and U.S. EPA approved disinfectant. As such, Cargill is unable to reduce the use of Peracetic Acid but will ensure sound management and use of this substance that minimizes significant adverse impacts on human health and the environment.

### 1.3 Reduction Objectives

Cargill prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. Cargill will strive to optimize the use of Peracetic Acid at the facility. No technically and economically feasible options for reduction or elimination of this substance have been identified. As part of the continuous improvement practices at the facility, technical advances will be monitored for new opportunities to reduce the use of Peracetic Acid at the facility.

### 1.4 Description of Substance

Cargill purchases both Blitz Antimicrobial Agent, containing approximately 16% Peracetic Acid and Inspexx Sanitizer, containing approximately 20% Peracetic Acid, for use in their carcass wash and sanitization operations for microbial control. Dilute Inspexx solution is applied to carcasses as an antimicrobial agent. The concentrate is diluted to 170 mg/L and is applied at a

maximum rate of 3.5 USG/min (15.91 L/min). Dilute Blitz solution is applied to carcasses as an antimicrobial agent. The concentrate is diluted to 220 mg/L and is applied at a maximum rate of 340 L/24 hours.

### **1.5 Toxic Substance Reduction Option to be Implemented**

There are currently no reduction options that have been identified as being both technically and economically feasible for this substance.

### **1.6 Plan Summary Statement**

This plan accurately reflects the content of the toxic substance reduction plan for Peracetic Acid (and its salts), dated July 12, 2019.

### **1.7 Copy of Plan Confirmation**

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

## 2. BASIC FACILITY INFORMATION

Facility Identification and Site Address		
<b>Company Name</b>	Cargill Limited	
<b>Facility Name</b>	Cargill Limited – Beef Division	
<b>Facility Address</b>	Physical Address:	Mailing Address:
	165 Dunlop Drive Guelph, ON N1L 1P4	165 Dunlop Drive Guelph, ON N1L 1P4
<b>Spatial Coordinates (UTM)</b>	564486.63 (Easting)	(Northing) 4822579.99
<b>Datum</b>	UTM 17	
<b>Number of Employees</b>	950 (Full time equivalents)	
<b>NPRI ID</b>	11105	
<b>ON MOE ID</b>	-	
Parent Company Information		
<b>Parent Company Name &amp; Address</b>	Cargill Limited 165 Dunlop Drive Guelph, ON N1L 1P4	
<b>Percent Ownership</b>	100%	
Primary North American Industrial Classification System Code (NAICS)		
<b>2 Digit NAICS Code</b>	31	
<b>4 Digit NAICS Code</b>	3116	
<b>6 Digit NAICS Code</b>	311611	
Company Contact Information		
<b>Facility Public Contact</b>	Bill Castledine, Utilities, Capital Projects, Environmental Superintendent	Contact Address:
	William_Castledine@cargill.com	Cargill Limited
	Phone: (519)-823-5200	165 Dunlop Drive Guelph ON,
	Fax: (519)-823-5451	N1L 1P4

### 3. COPY OF PLAN CONFIRMATION

#### Confirmation by the Highest Ranking Employee

As of July 24, 2019, I, Matt Gibney, confirm 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, with the exception of the regulatory deadline, comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Peracetic Acid (and its salts)



Matt Gibney  
General Manager  
Cargill Limited – Guelph Beef Division

#### Confirmation by Licensed Planner

As of July 12, 2019, I, Tim Logan confirm 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 July 12, 2019 and that the plans, with the exception of the regulatory deadline, comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Peracetic Acid (and its salts)



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