SASKATOON
220 3rd Avenue South,
Suite 413,
Saskatoon, Saskatchewan
S7K 1M1
T: 306.343.5500
TF: 1.866.919.8899
F: 306.343.3601

REGINA
369 Park Street,
Regina, Saskatchewan
S4N 5B2
T: 306.522.6100
TF: 1.866.919.1861
F: 306.522.6101

WINNIPEG
300 - 1600 Ness Avenue,
Madison Square
Winnipeg, Manitoba
R3J 3W7
T: 204.783.1276
TF: 1.866.919.4531
F: 204.478.4940

LONDON
700 Richmond Street,
Suite 307,
London, Ontario
N6A 5C7
T: 519.452.7700
TF: 1.866.919.4531
F: 519.452.1712

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5310 Canotek Road,
Unit 30,
Ottawa, Ontario
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T: 613.824.8900
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IQALUIT
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Iqaluit, Nunavut
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TOXIC SUBSTANCE REDUCTION PLAN
PARTICULATE MATTER 2.5 AND 10

Sivaco Ontario,
330 Thomas Street
Ingersoll Ontario N5C 3K5

December 16, 2013

Table of Contents

1 General Information

1.1 Basic Facility Information

Toxic Substance Information		
Name of Substance	Particulate Matter 2.5 and 10	
Facility Identification and Site Address		
Company Name	SIVACO Ontario	
Facility Address	Physical Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5	Mailing Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5
Spatial Coordinates of Facility	17N 4763628 509188 *Expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum.*	
Number of Employees	75 *Number of full time employee equivalents*	
NPRI ID	3328	
Parent Company Information *(if applicable)*		
Parent Company Name	SIVACO Wire Group 2004 L.P.	
Parent Company Address	Physical Address: 1040 Country Road 17 C/O IRM LOriginal Ontario K0B 1K0	Mailing Address (if different): 700 Ouelette C/O Infasco Marieville Quebec J3M 1P6
Business Number for Parent Company	141221879	
Facility Owner Information		
Owner of the Facility		
Address of Owner	Physical Address:	Mailing Address (if different):
Facility Operator Information		
Operator of the Facility	SIVACO Ontario	
Address of Operator	Physical Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5	Physical Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 - manufacturing	
4 Digit NAICS Code	3328 – metal coating, engraving, heat treating and allied services	

1.2 Contact Information

Company Contact Information		
Facility Public Contact	Name:	Lawerence Pye
	Email:	pye@sivaco.com
	Phone:	519-485-4150
	Fax:	519-485-3039
	Contact Address:	330 Thomas Street, Ingersoll Ontario, N5C 3K5
Person Coordinating Plan Development Contact	Name:	Norman Courage
	Email:	courage@sivaco.com
	Phone:	519-485-4150
	Fax:	519-485-3039
	Contact Address:	330 Thomas Street, Ingersoll Ontario, N5C 3K5
Highest Ranking Employee	Name:	Bill Stevens
	Email:	stevens@sivaco.com
	Phone:	519-485-4150
	Fax:	519-485-3039
	Contact Address:	330 Thomas Street, Ingersoll Ontario, N5C 3K5
Planner Contact Information		
Person Who Prepared the Plan **Person Responsible for Making Recommendations** **Person Responsible for Plan Certification**	Name:	Eric Shilts
	License Number	TSRP0083
	Email:	eric@concentriceng.com
	Phone:	519-452-7700
	Fax:	519-452-1712
	Contact Address:	Suite 307 700 Richmond Street London Ontario N6A 5C7

2 Statement of Intent

2.1 Statement of No Intent to Reduce

Particulate Matter (PM) 2.5 (having a diameter of less than 2.5 µm) and 10 (having a diameter of less than 10 µm) are created by SIVACO Ontario. This facility does not use PM2.5 and PM10 and therefore this plan will not address their use.

SIVACO Ontario does not intend to reduce the creation or release of PM10 or PM2.5 since no reduction options were identified which were technically and economically feasible.

3 Objectives and Targets

Although SIVACO Ontario has no specific objectives with regard to PM2.5 and PM10 reduction at its facility, SIVACO Ontario will continue to monitor advancements in technology which may result in future reductions of PM2.5 and PM10 at the facility.

4 Facility Description

SIVACO Ontario (a HEICO Company) is an integral part of the SIVACO Wire Group. The facility in Ingersoll, Ontario treats a wide range of Hot Rolled Wire Rod (HRWR) for Cold Heading Quality and Industrial Quality products. The finished products are used in various commercial and industrial applications such as fasteners, automotive parts and construction materials.

Steel treatment at SIVACO Ontario may involve many steps. The particular treatments (and their order) by which HWRW is treated vary according to client requirements. The various methods of HWRW are listed below:

- Heat Treatment
- Pickling Treatment
- Zinc Phosphate Conversion Coating and Rinse Treatment
- Neutralizer Treatment
- Soap Treatment
- Polymer Treatment
- Borax Treatment
- Lime Treatment
- Sizing Treatment
- Bundling and Shipping

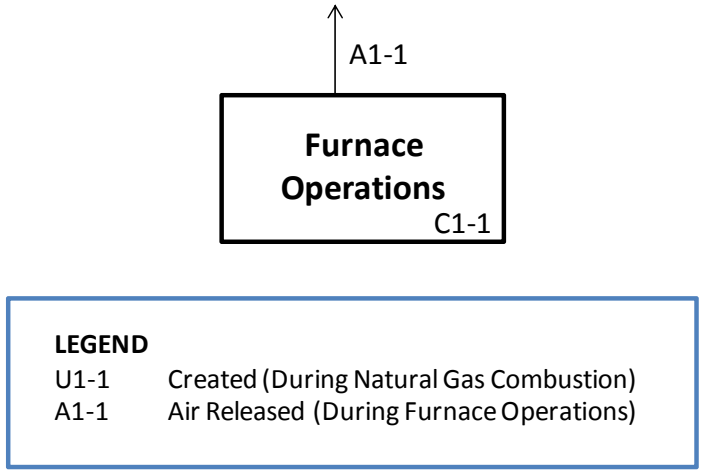
The SIVACO Ontario facility also relies on various other auxiliary operations which facilitate HWRW treatment (e.g. wastewater treatment, chemical receiving and storage etc).

5 PM2.5 and PM10 Process Flow Diagrams and Quantifications

PM2.5 and PM10 are not used at the SIVACO Ontario facility. They are rather created and released to air in the Furnace Operations Stage (Limited to the Furnace Operations Process) and the Cooling Tower Operations Stage (Limited to Cooling Tower #1 Operations Process and Cooling Tower #2 Operations Process).

5.1 Furnace Operations Process

Process Flow Diagram



Process Description

Particulate matter (Both PM10 and PM2.5) are created during natural gas combustion during furnace operations. The particulate matter (Both PM10 and PM2.5 are released to air via furnace venting).

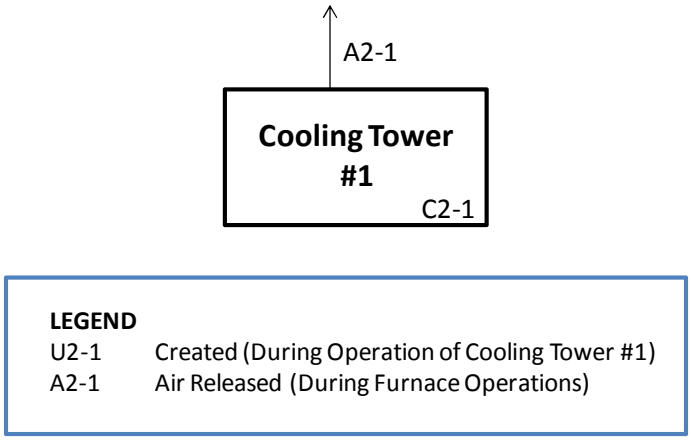
Toxic Substance Accounting Summary

A summary of toxic substance accounting for phosphorus is presented in the table, below. Accounting calculations have been completed for phosphorus and are presented in the Substance Accounting Calculations in Appendix A. The calculations include information on the quantification method and its rationale as well as the input/output balance for the Furnace Operations Process.

Code	Description	PM10 Quantity (tonnes)	PM2.5 Quantity (tonnes)
Process Inputs			
C1-1	Creation (During combustion of natural gas)	0.490	0.490
Process Outputs			
A1-1	Released to Air	0.490	0.490

5.2 Cooling Tower #1 Operation Process

Process Flow Diagram



Process Description

Particulate matter (both PM10 and PM2.5) are created during the operation of Cooling Tower #1. The source of the particulate matter is the dissolved solids present in the cooling water itself. All particulate matter created during Cooling Tower #1 operation is assumed to be released to air.

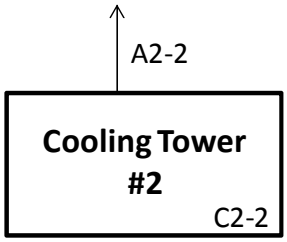
Toxic Substance Accounting Summary

A summary of toxic substance accounting for phosphorus is presented in the table, below. Accounting calculations have been completed for phosphorus and are presented in the Substance Accounting Calculations in Appendix A. The calculations include information on the quantification method and its rationale as well as the input/output balance for the Cooling Tower #1 Operation Process.

Code	Description	PM10 Quantity (tonnes)	PM2.5 Quantity (tonnes)
Process Inputs			
C2-1	Creation (During operation of Cooling Tower #1)	0.93	0.0030
Process Outputs			
A2-1	Release to Air	0.93	0.0030

5.3 Cooling Tower #2 Operation Process

Process Flow Diagram



LEGEND

U2-2	Created (During Operation of Cooling Tower #2)
A2-2	Air Released (During Furnace Operations)

Process Description

Particulate matter (both PM10 and PM2.5) are created during the operation of Cooling Tower #1. The source of the particulate matter is the dissolved solids present in the cooling water itself. All particulate matter created during Cooling Tower #2 operation is assumed to be released to air.

Toxic Substance Accounting Summary

A summary of toxic substance accounting for phosphorus is presented in the table, below. Accounting calculations have been completed for phosphorus and are presented in the Substance Accounting Calculations in Appendix A. The calculations include information on the quantification method and its rationale as well as the input/output balance for the Cooling Tower #2 Operation Process.

Code	Description	PM10 Quantity (tonnes)	PM2.5 Quantity (tonnes)
Process Inputs			
C2-1	Creation (During operation of Cooling Tower #1)	0.071	0.0035
Process Outputs			
A2-1	Release to Air	0.071	0.0035

6 Direct and Indirect Costs

There are no direct costs associated with the creation of PM2.5 and PM10 at the SIVACO Ontario facility.

Indirect costs associated with PM2.5 and PM10 use at the facility were also considered and a total amount of $8,000 was assigned. This figure took into account an appropriate percentage of costs associated with cooling tower operation and man hours required in completing annual emissions calculations.

7 Identification of Toxics Reduction Options

Category #	Category	Description of Option (or rationale for why an option could not be identified)
1	Materials or Feedstock Substitution	No option identified. PM2.5 and PM10 are not part of any feedstock used at SIVACO Ontario. Thus there are no possible substitutions.
2	Product design or reformulation	No option identified. Product design is based on client specifications and therefore cannot be altered.
3	Equipment or process modifications	Replace drift eliminators in cooling tower(s) which will reduce drift loss (and thus particulate matter creation).
4	Spill and leak prevention	No option identified. PM2.5 and PM10 are released to air and do not result from leaks or spills.
5	On-site reuse or recycling	No option identified. PM2.5 and PM10 cannot be reused or recycled at the site.
6	Improved inventory management or purchasing techniques	No option identified. PM2.5 and PM10 are not purchased or inventoried at the site.
7	Training or improved operating practices	No option identified. Training does not impact the amount of PM2.5 and PM10 released to air.

8 Estimates of PM2.5 and PM10 Reduction, Technical Feasibility and Economic Feasibility

8.1 Equipment or Process Modifications

Option: Replace drift eliminators in cooling tower(s) which will reduce drift loss (and thus particulate matter creation).

8.1.1 Estimates of Reduction PM10

Category		Baseline	Reduction	Reduced Total	% Reduction
Used (tonnes/year)		NA	NA	NA	NA
Created (tonnes/year)		0.653	0.082	0.571	12.6%
Contained in Product (tonnes/year)		NA	NA	NA	NA
Onsite Releases (tonnes/year)	**Air**	0.653	0.082	0.571	12.6%
	Water	NA	NA	NA	NA
	Land	NA	NA	NA	NA
Disposal (tonnes/year)	**Air**	NA	NA	NA	NA
	Water	NA	NA	NA	NA
	Land	NA	NA	NA	NA
Transfer Offsite for Recycling (tonnes/year)		NA	NA	NA	NA

8.1.2 Estimates of Reduction PM2.5

Category		Baseline	Reduction	Reduced Total	% Reduction
Used (tonnes/year)		NA	NA	NA	NA
Created (tonnes/year)		0.4961	0.00325	0.4929	0.066%
Contained in Product (tonnes/year)		NA	NA	NA	NA
Onsite Releases (tonnes/year)	**Air**	0.4961	0.00325	0.4929	0.066%
	Water	NA	NA	NA	NA
	Land	NA	NA	NA	NA
Disposal (tonnes/year)	**Air**	NA	NA	NA	NA
	Water	NA	NA	NA	NA
	Land	NA	NA	NA	NA
Transfer Offsite for Recycling (tonnes/year)		NA	NA	NA	NA

8.1.3 Technical Feasibility

Replace drift eliminators in cooling tower(s) which will reduce drift loss (and thus particulate matter creation) is a technically feasible option with a relatively small amount of required resources. This option would involve commissioning the replacement of drift eliminators by a qualified contractor.

Implementing this option could result in a “best-case scenario” reduction of 12.5% and 0.066% of PM10 and PM2.5, respectively created and released to air.

8.1.4 Economic Feasibility

The economic feasibility of this option was examined. The total cost of replacing the drift eliminators on both cooling towers would be placed in the range of $5,000 to $10,000. Since the cost to implement this option is moderately high compared to a relatively low reduction in PM10 and PM2.5, this option was determined to not be economically feasible.

9 List of Technically and Economically Feasible Options

No options were found to be technically and economically feasible.

10 No Options to be Implemented

No options were identified which were technically and economically feasible. Therefore no options will be implemented.

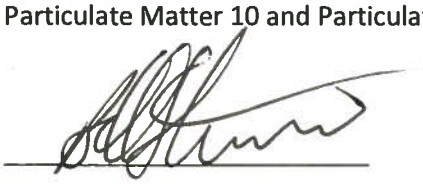
Although SIVACO Ontario has no specific objectives with regard to PM2.5 and PM10 reduction at its facility, SIVACO Ontario will continue to monitor advancements in technology which may result in future reductions of PM2.5 and PM10 at the facility.

11 Certifications

11.1 Highest Ranking Employee

As of December 16, 2013, I, Bill Stevens, 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 and Particulate Matter 2.5



Highest Ranking Employee Date

11.2 Toxic Substance Reduction Planner

As of December 16, 2013 I, Eric Shilts certify that I am familiar with the processes at SIVACO Ontario that use or create the toxic substance 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 November 29, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Particulate Matter 10 and Particulate Matter 2.5

December 16, 2013

Toxic Substance Reduction Planner Date

APPENDIX A

Substance Accounting Calculations

TRA Substance Accounting Summary - PM10

Stage: **Heat Treatment Furnace Operations**
Process: **1 - Furnace Operations**

Code	Description	Quantity (tonne)
C1-1	Creation- Process 1 (Created during natural gas combustion)	4.90E-01
A1-1	Air Released - Process 1 (During Furnace Operations)	4.90E-01

Note: There is no creation, destruction, disposal, offsite transfer or contained in product value for propylene at the Sivaco facility.

Quantity Entering the Process/ Usage + Creation = Air Release + Destruction + Disposal + Transfer + Contained in Product/Quantity Exiting the Process

Mass Balance - Stage 1

		Code	Quantity (tonne)
Process 1	Usage/Quantity Entering the Process	-	-
	Creation	C1-1	0.490
	Air Releases	A1-1	0.490
	Destruction	-	-
	Disposal	-	-
	Transfer	-	-
	Quantity Exiting the Process/Contained in Product	-	-
	Unaccounted Material (Difference between inputs and outputs)		0.000

Process Mass Balance Rationale

Process 1	Approximately equal. No rationale is required.

Quantification Method and Best Available Method Rationale

Process: 1 - Furnace Operations

Quantity Codes	Quantification Method	Best Available Method Rationale
C1-1	Mass balance based on material quantity and emission factors taken from U.S. EPA, AP-42	Most accurate method available (average data quality)
A1-1	Mass balance based on assumption that all PM10 is released to air from furnaces after use.	Most accurate method available (average data quality)

TRA Substance Accounting Summary - PM10

Stage: **Cooling Tower Operations**
Process: **1 - Cooling Tower #1 Operations**
2 - Cooling Tower #2 Operations

Code	Description	Quantity (tonne)
C2-1	Created- Process 1 (PM10 in Cooling Tower #1 Circulation Water)	0.093
C2-2	Created- Process 2 (PM10 in Cooling Tower #2 Circulation Water)	0.071
A2-1	PM10 released to air from Cooling Tower #1	0.093
A2-2	PM10 released to air from Cooling Tower #2	0.071

Note: There is no creation, destruction, disposal, offsite transfer or contained in product value for

Quantity Entering the Process/ Usage + Creation = Air Release + Destruction + Disposal + Transfer + Contained in Product/Quantity Exiting the Process

Mass Balance - Stage 1

		Code	Quantity (tonne)
Process 1	Usage/Quantity Entering the Process	-	-
	Creation	C2-1	0.093
	Air Releases	A2-1	0.093
	Destruction	-	-
	Disposal	-	-
	Transfer	-	-
	Quantity Exiting the Process/Contained in Product	-	-
	Unaccounted Material (Difference between inputs and outputs)		0.000

		Code	Quantity (tonne)
Process 2	Usage/Quantity Entering the Process	-	-
	Creation	C2-2	0.071
	Air Releases	A2-2	0.071
	Destruction	-	-
	Disposal	-	-
	Transfer	-	-
	Quantity Exiting the Process/Contained in Product	-	-
	Unaccounted Material (Difference between inputs and outputs)		0

Process Mass Balance Rationale

Process 1	Approximately equal. No rationale is required.
Process 2	Approximately equal. No rationale is required.

TRA Substance Accounting Summary - PM10

Quantification Method and Best Available Method Rationale

Process: 1 - Cooling Tower #1

Quantity Codes	Quantification Method	Best Available Method Rationale
C2-1	Mass balance based on material quantity and NALCO Water Treatment Report.	Most accurate method available (average data quality)
A2-1	Mass balance based on Environment Canada NPRI Toolbox.	Most accurate method available (average data quality)

Process: 2 - Cooling Tower #2

Quantity Codes	Quantification Method	Best Available Method Rationale
C2-2	Mass balance based on material quantity and NALCO Water Treatment Report.	Most accurate method available (average data quality)
A2-2	Mass balance based on Environment Canada NPRI Toolbox.	Most accurate method available (average data quality)

Facility			
	Usage/Quantity Entering the Facility	-	-
	Creation	C1-1+C2-1+C2-1	0.653
	Air Releases	A1-1 + A2-1 + A2-2	0.653
	Destruction	-	-
	Disposal	-	-
	Transfer	-	-
	Quantity Exiting the Process/Contained in Product	-	-
	Unaccounted Material (Difference between inputs and outputs)		0.000

TRA Substance Accounting Summary - PM2.5

Stage: **Heat Treatment Furnace Operations**
Process: **1 - Furnace Operations**

Code	Description	Quantity (tonne)
C1-1	Created - Process 1 (during combustion of natural gas)	0.490
A1-1	Air Released - Process 1 (During Furnace Operations)	0.490

Note: There is no creation, destruction, disposal, offsite transfer or contained in product value for propylene at the Sivaco facility.

Quantity Entering the Process/ Usage + Creation = Air Release + Destruction + Disposal + Transfer + Contained in Product/Quantity Exiting the Process

Mass Balance - Stage 1

		Code	Quantity (tonne)
Process 1	Usage/Quantity Entering the Process	-	-
	Creation	C1-1	0.490
	Air Releases	A1-1	0.489568189
	Destruction	-	-
	Disposal	-	-
	Transfer	-	-
	Quantity Exiting the Process/Contained in Product	-	-
	Unaccounted Material (Difference between inputs and outputs)		0.000

Process Mass Balance Rationale

Process 1	Approximately equal. No rationale is required.

Quantification Method and Best Available Method Rationale

Process: 1 - Furnace Operations

Quantity Codes	Quantification Method	Best Available Method Rationale
U1-1	Mass balance based on material quantity and emission factors taken from U.S. EPA, AP-42	Most accurate method available (average data quality)
A1-1	Mass balance based on assumption that all PM2.5 is released to air from furnaces after use.	Most accurate method available (average data quality)

TRA Substance Accounting Summary - PM2.5

Stage: **Cooling Tower Operations**
Process: **1 - Cooling Tower #1 Operations**
2 - Cooling Tower #2 Operations

Code	Description	Quantity (tonne)
C2-1	Created - Process 1 (PM2.5 in Cooling Tower #1 Circulation Water)	0.0030
C2-2	Created - Process 2 (PM2.5 in Cooling Tower #2 Circulation Water)	0.0035
A2-1	PM2.5 released to air from Cooling Tower #1	0.0030
A2-2	PM2.5 released to air from Cooling Tower #2	0.0035

Note: There is no creation, destruction, disposal, offsite transfer or contained in product value for

Quantity Entering the Process/ Usage + Creation = Air Release + Destruction + Disposal + Transfer + Contained in Product/Quantity Exiting the Process

Mass Balance - Stage 1

		Code	Quantity (tonne)
Process 1	Usage/Quantity Entering the Process	-	-
	Creation	C2-1	0.0030
	Air Releases	A2-1	0.0030
	Destruction	-	-
	Disposal	-	-
	Transfer	-	-
	Quantity Exiting the Process/Contained in Product	-	-
	Unaccounted Material (Difference between inputs and outputs)		0.0000

		Code	Quantity (tonne)
Process 2	Usage/Quantity Entering the Process	-	-
	Creation	C2-2	0.0035
	Air Releases	A2-2	0.0035
	Destruction	-	-
	Disposal	-	-
	Transfer	-	-
	Quantity Exiting the Process/Contained in Product	-	-
	Unaccounted Material (Difference between inputs and outputs)		0.0000

Process Mass Balance Rationale

Process 1	Approximately equal. No rationale is required.
Process 2	Approximately equal. No rationale is required.

TRA Substance Accounting Summary - PM2.5

Quantification Method and Best Available Method Rationale

Process: 1 - Cooling Tower #1

Quantity Codes	Quantification Method	Best Available Method Rationale
C2-1	Mass balance based on material quantity and NALCO Water Treatment Report.	Most accurate method available (average data quality)
A2-1	Mass balance based on Environment Canada NPRI Toolbox.	Most accurate method available (average data quality)

Process: 2 - Cooling Tower #2

Quantity Codes	Quantification Method	Best Available Method Rationale
C2-2	Mass balance based on material quantity and NALCO Water Treatment Report.	Most accurate method available (average data quality)
A2-2	Mass balance based on Environment Canada NPRI Toolbox.	Most accurate method available (average data quality)

Facility	Usage/Quantity Entering the Facility	-	-
	Creation	C1-1 + C2-1 + C2-2	0.4961
	Air Releases	A1-1 + A2-1 + A2-2	0.4961
	Destruction	-	-
	Disposal	-	-
	Transfer	-	-
	Quantity Exiting the Process/Contained in Product	-	-
	Unaccounted Material (Difference between inputs and outputs)		0.0000

APPENDIX B

Planner Recommendations

The main purposes of planner recommendations are to improve the potential for toxics reduction and improve the business rationale for implementing a plan. As per the Toxics Reduction Act and associated Regulation, there are several areas for which the planner must make recommendations (with accompanying rationale) or provide a reason why no recommendations are made. Recommendations are presented in the following subsections. It should be noted that it is up to the facility as to whether or not to implement the planner's recommendations.

1 Recommendation: General Information

There are no recommendations pertaining to general information contained in this plan.

1.1 Rationale

General information provided is complete.

2 Recommendation: Expertise Relied on to Prepare the Plan

There are no recommendations pertaining to expertise relied on to prepare this plan.

2.1 Rationale

Expertise was adequately considered during the preparation of this plan.

3 Recommendation: Statement of Intent and Objectives

There are no recommendations pertaining to the statement of intent or objectives contained in this plan.

3.1 Rationale

Both the statement of intent and objectives are present and reflect the intentions of SIVACO Ontario with respect to no intent to reduce creation or release of PM10 and PM2.5.

4 Recommendation: Identification and Description of Stages and Processes

4.1 Identification and Description of Stages and Processes

There are no recommendations pertaining to identification and description of stages and processes contained in this plan.

4.1.1 Rationale

Stages and processes where PM10 and/or PM2.5 are present are clearly identified and described. The process descriptions accurately provide information on the creation and release of PM10 and PM2.5.

4.2 Description of Why the Substance is Used and/or Created

There are no recommendations pertaining to the description (of how PM10 and PM2.5 are created) contained in this plan.

4.2.1 Rationale

The description (of how PM10 and PM2.5 are created) contained in this plan is clear and accurate.

4.3 Process flow diagrams

There are no recommendations pertaining to process flow diagrams contained in this plan.

4.3.1 Rationale

The process flow diagram contained in this plan accurately represents the creation and release of PM10 and PM2.5.

5 Recommendation: Data and Best Available Methods Used

There are no recommendations pertaining to the data and best available methods used for calculations contained in this plan.

5.1 Rationale

All quantities were calculated using the best available data and methods. The rationale for best available methods used is reasonable.

6 Recommendation: Quantifications

There are no recommendations pertaining to the quantifications (including input/output balance) contained in this plan.

6.1 Rationale

All quantities were calculated using the best available data and methods. The input/output balance was approximately equal.

7 Recommendation: Direct and Indirect Costs

It is recommended that a more detailed analysis of indirect costs be completed.

7.1 Rationale

Completing a more detailed analysis of indirect costs will better enable SIVACO Ontario to consider the financial benefits/implications of implementing plan options.

8 Recommendation: Identification and Description of Toxics Reduction Options in Seven Categories

There are no recommendations pertaining to identification and description of toxic substance reduction options in seven categories presented in this plan.

8.1 Rationale

The plan provides an option in each category or a reason why no option was identified, showing due consideration to each of the seven categories.

9 Recommendation: Estimates of Reduction

There are no recommendations pertaining to estimates of toxic substance reduction presented in this plan.

9.1 Rationale

The reduction estimates have been completed for each option and are reasonable for the option with which they are associated.

10 Recommendation: Determination of Technical Feasibility

There are no recommendations pertaining to estimates of toxic substance reduction presented in this plan.

10.1 Rationale

Technical feasibility assessments contained in this plan appear to be well thought out and explained clearly.

11 Recommendation: Economic Feasibility Analysis

There are no recommendations pertaining to economic feasibility analysis presented in this plan.

11.1 Rationale

Economic feasibility analysis was adequately completed in preparation of this plan.

12 Recommendation: List of Technically and Economically Feasible Options

There are no recommendations pertaining to the lack of technically and economically feasible options identified in this plan. At present time, there are no recommendations of additional options which are technically and economically feasible.

12.1 Rationale

Lack of technically and economically feasible options identified by the plan as are representative of the available options to reduce toxic substances.

13 Recommendation: Options to be Implemented or Rationale for Why No Options will be Implemented

No options were identified which were technically and economically feasible. Therefore no options will be implemented.

Although SIVACO Ontario has no specific objectives with regard to PM2.5 and PM10 reduction at its facility, SIVACO Ontario will continue to monitor advancements in technology which may result in future reductions of PM2.5 and PM10 at the facility.