

Guide to calculations for ChemTRAC reporting: Fluid Milk Manufacturing

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How do I use this guide?

Part 1 of this guide will help you understand the ChemTRAC program, collect facility information, use the ChemTRAC calculator for Fluid Milk Manufacturing facilities, and report substances to ChemTRAC, if needed.

Part 2 of this guide will help you reduce your facility's environmental impact.

The Appendices provide additional emission calculation information.

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DISCLAIMER: This guide is for educational and informational purposes only. The City of Toronto assumes no liability for the accuracy or completeness of these materials. Readers are responsible for ensuring compliance with Toronto's Environmental Reporting and Disclosure Bylaw (Municipal Code Chapter 423). These materials should not be relied upon as a substitute for legal or professional advice. Readers should seek their own legal or professional advice in regard to their use of the information contained in the guide.

Introduction to the ChemTRAC program

There are chemicals in Toronto's environment that can harm our health. These substances come from vehicle exhaust, homes, businesses and other sources.

Toronto Public Health identifies 25 of these chemicals as "priority substances" because they are found in our local environment at levels that are of concern for health. Evidence links these substances to short-term health effects like respiratory problems, and longer-term impacts such as cancer. In a business setting, these substances can come from process heating, cleaning with solvents, welding and other processes.

The list of 25 substances and the reporting thresholds are included in Table 4 on page 35 of this guide.

ChemTRAC is a City of Toronto program that:

- tracks where businesses use and release these priority substances;
- helps businesses reduce or replace these substances with safer alternatives; and
- provides the public with information on priority substances in their community.

As part of ChemTRAC, Toronto's Environmental Reporting and Disclosure Bylaw (Municipal Code Chapter 423) requires many businesses to report to the City each year if they use or release a certain amount of priority substances to the environment. Fluid Milk Manufacturing facilities are covered by this bylaw.

This guide is designed to help you and other Fluid Milk Manufacturing facility owners:

- understand if your facility uses and releases any ChemTRAC priority substances;
- use ChemTRAC calculators to determine if you are required to report to the City of Toronto;
- use the ChemTRAC online reporting system to submit data to the City;
 and
- consider ways to reduce your environmental impact.

Additional information on the ChemTRAC program and the Environmental Reporting and Disclosure Bylaw is available by calling 3-1-1 or online at: http://www.toronto.ca/chemtrac/

The Fluid Milk Manufacturing sector

The North American Industrial Classification System (NAICS) code 311511 includes establishments primarily engaged in manufacturing milk and processed milk products. Establishments primarily engaged in manufacturing substitute products are included. Facilities that prepare products for immediate retail sale are exempt.

This guide uses the term "Fluid Milk Manufacturing facilities" to refer to all facilities within the Fluid Milk Manufacturing Sector.

Fluid Milk Manufacturing facilities are required to report their data every year if they use or release above the reporting threshold. The report is due by June 30 each year. Annual data that is reported each June should cover the period from January 1 to December 31 of the previous year.

Identifying ChemTRAC substances in Fluid Milk Manufacturing facilities

Figure 1 indicates typical steps taken in a Fluid Milk Manufacturing facility. Not all Fluid Milk Manufacturing facilities will follow these steps exactly. However, Fluid Milk Manufacturing facilities will pasteurize milk, which is the sole process that releases a ChemTRAC priority substance.

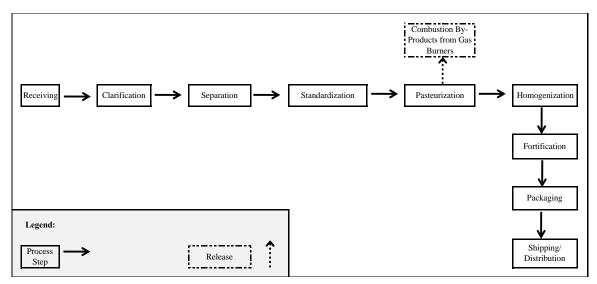


Figure 1. Typical steps taken in a Fluid Milk Manufacturing facility

Figure 1 also shows the source of ChemTRAC priority substances that are released in a typical Fluid Milk Manufacturing facility. ChemTRAC priority substances are released only as by-products from the combustion of natural gas in the burners used for pasteurization.

Combustion by-products from natural gas burners. Several substances are released when natural gas is burned (i.e. combusted) during the pasteurization process. When natural gas is combusted to generate heat, it releases ChemTRAC priority substances.

Table 1 lists the ChemTRAC substances that a typical Fluid Milk Manufacturing facility would release as combustion by-products. The ChemTRAC calculator can help you estimate the levels of these substances in your facility.

Table 1. ChemTRAC substances released in a typical Fluid Milk Manufacturing facility, and their source of release

	Steps in the manufacturing of fluid milk				
ChemTRAC priority	Pasteurization				
substances	Substances are released in small quantities as combustion by-products				
Benzene	X				
Cadmium and its	Х				
compounds					
Chromium and its	X				
compounds					
Formaldehyde	X				
Lead and its	X				
compounds					
Manganese and its	X				
compounds					
Mercury and its	X				
compounds					
Nickel and its	X				
compounds					
Nitrogen Oxides	X				
PM2.5	X				
PAHs	X				
VOCs	Χ				

Most of the substances listed in Table 1 are released in very small amounts. It is likely that only PM2.5, VOCs and NO_x would be released in amounts that could appear as non-zero in the ChemTRAC calculator for Fluid Milk Manufacturing.

Particulate Matter 2.5 (PM2.5). The term "particulate matter" describes solid and liquid particles found in the air we breathe. Particulate matter that is smaller than 0.0025 millimetres in diameter is called PM2.5 and may not be visible to the naked eye.

Volatile Organic Substances (VOCs). VOCs are a group of organic chemicals that easily evaporate into the air. You can often smell them. They are created as a by-product of various activities and are released in small quantities when natural gas is burned.

Nitrogen oxides (NO_x). NO_x is the term used to describe a category of chemicals known as nitrogen oxides. They typically refer to nitric oxide (NO) and nitrogen dioxide (NO₂). All combustion processes in the presence of air produce NO_x. Nitrogen dioxide was identified as one of five common air pollutants of

significant health concern that contributes to the burden of illness from air pollution in Toronto.

The health effects of PM2.5, VOCs and NO_x

PM2.5. Because of their small size, PM2.5 can lodge deeply into the lungs. Numerous studies have linked PM to aggravated cardiac and respiratory diseases such as asthma, bronchitis and emphysema, and to heart disease.

VOCs. Short-term health effects of exposure to VOCs may include eye, nose, and throat irritation, headaches, loss of coordination, and nausea. Over longer periods, VOCs can damage the liver, kidneys, and central nervous system.

 NO_x . Long-term exposure to NO_x causes or worsens respiratory disease such as emphysema and bronchitis, and can aggravate existing heart disease.

For more information on the health effects of these substances, as well as other ChemTRAC priority substances, visit

http://www.toronto.ca/health/chemtrac/substances.htm.

Calculating emissions

To help Toronto businesses calculate their emissions and comply with the Environmental Reporting and Disclosure Bylaw, Toronto Public Health developed calculators that are specific to industrial sectors and processes. Access these calculators from the ChemTRAC website at

http://www.toronto.ca/health/chemtrac/tools.htm

These calculators help businesses do three things:

- Identify which ChemTRAC priority substances are used or released in their facility
- Calculate the amounts of ChemTRAC priority substances used or released
- Determine what they are required to report to the ChemTRAC program.

Appendix A describes how the calculators calculate estimates of the quantities of ChemTRAC priority substances that are released from your facility.

The release of ChemTRAC priority substances can be calculated using methods other than the ChemTRAC calculators. See

http://www.toronto.ca/health/chemtrac/tools.htm for a list of alternative methods.

In the next section, we will work through a worksheet to prepare you to use the ChemTRAC calculators for Fluid Milk Manufacturing.

Worksheet for collecting information

The worksheet found on the next page is intended to help you collect all the information on natural gas fired equipment that you will need to use the ChemTRAC calculator for Fluid Milk Manufacturing.

Note: if your facility has more processes than those shown in Figure 1 on page 3 of this guide, or if your facility has sources of ChemTRAC priority substances other than the combustion of natural gas, you may need to use additional calculators to identify other emissions. You would then add these amounts to the numbers generated by the ChemTRAC calculator for Fluid Milk Manufacturing. You can use ChemTRAC's "Calculation of Totals" calculator to combine the findings of multiple calculators and determine if you exceed ChemTRAC thresholds. See Appendix B for more details.

Worksheet: Natural gas fired equipment used for pasteurization

This worksheet will help you collect information on the quantity of natural gas used for your facility's pasteurization processes and on any control technologies that your facility might use. By filling out Worksheet Table 1 and Worksheet Table 2 on the next page, you will have all the information you need to use the ChemTRAC calculator. You should collect data on your facility for the period from January 1 to December 31 of a calendar year. The worksheet tables can be filled in with answers to the two questions below:

1. What control technologies are installed on your natural gas pasteurization equipment?

You can find this information in the operating manuals for the heating equipment that your facility uses for pasteurization. Descriptions of control technologies can be found in the Control technologies for reducing emissions section on page 25 of this guide. If you do not know which control technologies are in place, assume that none are. Use this information to fill out Worksheet Table 1 on the next page.

2. How much natural gas is used for pasteurization?

This question can be answered using EITHER Option 2A or Option 2B. Use the Option that you have selected to complete Worksheet Table 2 on the next page.

Option 2A – What is the total amount of natural gas used for pasteurization? You can get this information from your annual gas bills. Note that the gas bills might include gas used for other purposes, such as heating the facility itself. You should consider only gas used for pasteurization. One way to know how much gas is used for pasteurization is to compare winter and summer bills. Winter bills will likely include facility heating as well as heating used for pasteurization. Summer months will likely include only pasteurization heating.

OR

Option 2B – What is the thermal rating of your pasteurization heating equipment? This rating (in BTU/hr, or kJ/hr) would be found in your heating equipment operating manual. You will also need to estimate the average number of hours per day, days per week, and weeks per year that your facility pasteurizes milk.

These worksheets can be printed and completed by hand so that all information can be readily available for entry into the ChemTRAC calculator.

Worksheet Table 1 - Control technologies information

Worksheet Table 1 - Control technologies information					
Pasteurization burners are equipped with (add a checkmark):					
a. Low NO _x burners only					
b. Low NO _x burners with recirculated flue gas					
c. No control technologies					
Worksheet Table 2 – Natural gas usage					
Option 2A. Total natural gas used for the pasteurization equipment					
Add values in cubic metres OR cubic feet:					
m³ (cubic metres) or ft³ (cubic feet)					
OR					
Option 2B. Thermal rating of the pasteurization equipment					
Add values in British Thermal Units per hour, OR in kilojoules per hour:					
kJ/hr					
Also estimate the average time that the pasteurization equipment is turned on and heating:					
hours per day and days per week andweeks per year					

Using the calculator

This section of the guide provides a step-by-step walkthrough of the main two screens of the calculator. The calculator can be used properly by entering the information from the two worksheet tables into the appropriate sections of the calculator. The ChemTRAC calculator will then automatically calculate the quantities of ChemTRAC substances released from processes found in your Fluid Milk Manufacturing facility.

Getting started

The ChemTRAC calculator for Fluid Milk Manufacturing can be read with software such as Microsoft Excel or Open Office. To find a copy of the calculator, go to http://www.toronto.ca/health/chemtrac/tools.htm and click on the "Fluid Milk" link found under the Food and Beverage Sector.

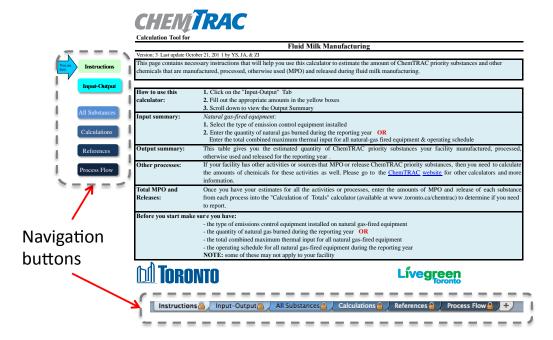
The calculator consists of six different screens:

- Instructions
- Input-Output
- All Substances
- Calculations
- References
- Process Flow

You only have to enter information into the Input-Output screen. The other screens are provided in the calculator mainly for reference. No information needs to be entered in these screens. These additional screens are discussed in Appendix A.

¹ If you have site-specific emission factors for any ChemTRAC substance, they can be entered manually in the Calculator screen. See Appendix A for details.

You can navigate between screens by clicking the buttons on the left side of each screen or by clicking on the tabs at the bottom of each screen:



The Instructions screen

The calculator should open on the Instructions screen. This screen contains instructions on how to use the calculator to estimate the amount of ChemTRAC substances and other substances that are used and released by your Fluid Milk Manufacturing facility. It also provides a brief overview of the contents of the calculator. You do not need to enter any information on this screen.

	Fluid Milk Manufacturing
Version: 3 Last update Oc	tober 21, 2011 by YS, JA, & ZI
	ressary instructions that will help you use this calculator to estimate the amount of ChemTRAC priority substances and other nufactured, processed, otherwise used (MPO) and released during fluid milk manufacturing.
How to use this	1. Click on the "Input-Output" Tab
calculator:	2. Fill out the appropriate amounts in the yellow boxes3. Scroll down to view the Output Summary
Input summary:	Natural gas-fired equipment: 1. Select the type of emission control equipment installed 2. Enter the quantity of natural gas burned during the reporting year OR Enter the total combined maximum thermal input for all natural-gas fired equipment & operating schedule
Output summary:	This table gives you the estimated quantity of ChemTRAC priority substances your facility manufactured, processed otherwise used and released for the reporting year.
Other processes:	If your facility has other activities or sources that MPO or release ChemTRAC priority substances, then you need to calculate the amounts of chemicals for these activities as well. Please go to the <u>ChemTRAC</u> website for other calculators and more information.
Total MPO and Releases:	Once you have your estimates for all the activities or processes, enter the amounts of MPO and release of each substance from each process into the "Calculation of Totals" calculator (available at www.toronto.ca/chemtrac) to determine if you need to report.
Before you start mak	e sure you have:
	 - the type of emissions control equipment installed on natural gas-fired equipment - the quantity of natural gas burned during the reporting year OR - the total combined maximum thermal input for all natural gas-fired equipment - the operating schedule for all natural gas-fired equipment during the reporting year NOTE: some of these may not apply to your facility

The Input-Output screen

The Input-Output screen is the screen where you will enter all information applicable to your Fluid Milk Manufacturing facility. Information is typed in **yellow boxes** only. Any yellow cells that do not apply to your Fluid Milk Manufacturing facility can be left as is. A **Dropdown menu** is also used to input the control efficiency of your natural gas heating equipment. The Input-Output screen can be filled out using the Worksheet Table 1 and Worksheet Table 2 that you have filled out on page 9 of this guide.

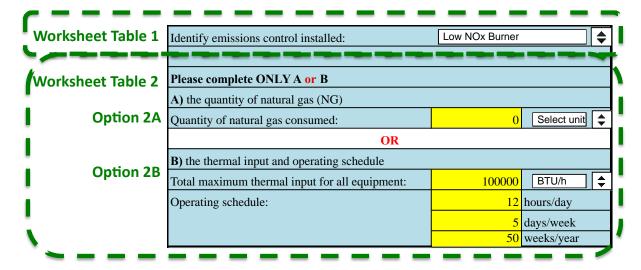
- This page gathers information related to the processes at your facility and shows the estimated amounts of substances manufactured, processed, otherwise used (MPO) or released.
- Please provide all the information requested in the yellow cells. If a section does not apply to your facility, leave it as it is.
- To determine if you need to report, add the amounts shown in the Output Summary table to any other MPO or
 release values from other processes or sources in your facility. Then you need to compare the total value to the
 reporting thresholds.
- You may use the <u>Calculation of Totals</u> spreadsheet to do the addition and comparison

Please complete the INPUT table below.

Identify emissions control installed:	Select		\$
Please complete ONLY A or B			
A) the quantity of natural gas (NG)			
Quantity of natural gas consumed:	0	Select t	
OR			
B) the thermal input and operating schedule			
Total maximum thermal input for all equipment:	0	Select (#
Operating schedule:	0	hours/day	
	0	days/week	
	0	weeks/year	

		(kg/yr)		
ChemTRAC Priority Substances	Manufactured	Processed	Otherwise Used	Released to Air
Benzene	0	0	0	0
Cadmium, and its compounds	0	0	0	0
Chromium (non-hexavalent), and its compounds	0	0	0	0
Formaldehyde	0	0	0	0
Lead, and its compounds	0	0	0	0
Manganese, and its compounds	0	0	0	0
Mercury, and its compounds	0	0	0	0
Nickel, and its compounds	0	0	0	0
Nitrogen Oxides (NOx)	0	0	0	0
Particulate Matter (PM2.5)	0	0	0	0
Total PAHs	0	0	0	0
Total Volatile Organic Compounds (VOCs)	0	0	0	0

The figure below shows an example of information from Worksheet Table 1 and Worksheet Table 2 entered into the Input-Output screen. In this example, a user has indicated that the facility uses Low NO_x Burners as control technologies on all heating equipment. The user has opted for Option 2B and has indicated that the maximum thermal input for all heating equipment is 100,000 BTU/hr. The facility operates for 12 hours per day, 5 days per week, and 50 weeks per year.



Once you have input the information from Worksheet Table 1 and Worksheet Table 2, the Output Summary found at the bottom of the screen indicates the ChemTRAC substances in kilograms that are manufactured, processed, otherwise used and released to air from your facility. You should compare these values to the ChemTRAC reporting thresholds to see if you are required to report ChemTRAC substances. See Interpreting Results on page 14 for more details.

Using our example, a total of 7 kg of NOx and 1 kg of Total Volatile Organics (VOCs) are manufactured and released to air per year.

OUTPUT SUMMARY (Only ChemTRAC priority substances)					
	Quantity (kg/yr)				
	3.5 0 . 31	n 1	Otherwise	Released to	
ChemTRAC Priority Substances	Manufactured ¹	Processed	Used ¹	Air ¹	
Benzene	0	0	0	0	
Cadmium, and its compounds	0	0	0	0	
Chromium (non-hexavalent), and its compounds	0	0	0	0	
Formaldehyde	0	0	0	0	
Lead, and its compounds	0	0	0	0	
Manganese, and its compounds	0	0	0	0	
Mercury, and its compounds	0	0	0	0	
Nickel, and its compounds	0	0	0	0	
Nitrogen Oxides (NOx)	7	0	0	7	
Particulate Matter (PM2.5)	0	0	0	0	
Total PAHs	0	0	0	0	
Total Volatile Organic Compounds (VOCs)	1	0	0	1	

² The definitions for 'Manufactured', 'Processed', 'Otherwise Used', and 'Released to Air' can be found on the References screen of the ChemTRAC calculator.

Guide to calculations for ChemTRA C reporting: fluid milk manufacturing

Interpreting results

Compare results to thresholds. Once the amounts of ChemTRAC substances manufactured, processed, otherwise used have been calculated, you must compare these amounts to the ChemTRAC reporting thresholds listed in the Environmental Reporting and Disclosure Bylaw. These thresholds are also listed in Appendix B of this guide.

Combining multiple calculation methods. Some facilities may need to add results of the ChemTRAC calculator for Fluid Milk Manufacturing with emissions from other processes that happen in the facility. This is further discussed in Appendix B.

If there are no other processes and, therefore, the ChemTRAC calculator is the only tool used to estimate emissions, the values in the Output Summary table of the calculator can be compared directly to the ChemTRAC reporting thresholds. See an example in Table 2.

Table 2. Comparison of results from the ChemTRAC calculator and reporting thresholds

Output Summary	Comparison to thresholds					
ChemTRAC Priority Substances	Manufactured (kg/yr))	Processed (kg/yr	Otherwise used (kg/yr)	Released to Air (kg/yr)	ChemTRAC reporting threshold (kg/yr)	Is reporting required?
Benzene	0.0	0.0	0.0	0.0	100	No
Cadmium and its compounds	0.0	0.0	0.0	0.0	1	No
Chromium (non- hexavalent) and its compounds	0.0	0.0	0.0	0.0	100	No
Formaldehyde	0.0	0.0	0.0	0.0	100	No
Lead and its compounds	0.0	0.0	0.0	0.0	10	No
Manganese and its compounds	0.0	0.0	0.0	0.0	10	No
Mercury and its compounds	0.0	0.0	0.0	0.0	1	No
Nickel and its compounds	0.0	0.0	0.0	0.0	100	No
Nitrogen Oxides	7	0.0	0.0	7	200	No
PM2.5	0.0	0.0	0.0	0.0	30	No
Total PAHs	0.0	0.0	0.0	0.0	10	No
VOC	1	0.0	0.0	1	100	No

³ The full by-law can be found at http://www.toronto.ca/health/chemtrac/report.htm.

If results exceed thresholds you must report. If a ChemTRAC priority substance is manufactured, processed, or otherwise used in an amount equal to or greater than its ChemTRAC reporting threshold, then you would need to report that substance and the quantity released to air.

In the **Error! Reference source not found.** example, nitrogen oxides, PM2.5 and VOCs are manufactured, processed, or otherwise used in quantities large enough to appear as greater than zero in the calculator. When comparing quantities to the ChemTRAC reporting thresholds, only nitrogen oxides are greater than its reporting threshold. Therefore, in the **Error! Reference source not found.** example, the manufacturing of nitrogen oxides and its release to air would need to be reported to the ChemTRAC program.

Reporting to ChemTRAC

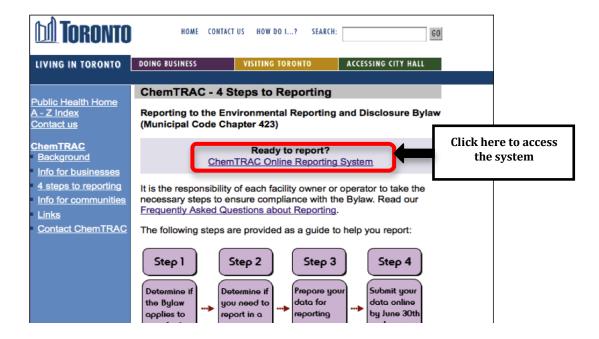
You are only required to report to ChemTRAC if you meet or exceed reporting thresholds for one or more priority substances.

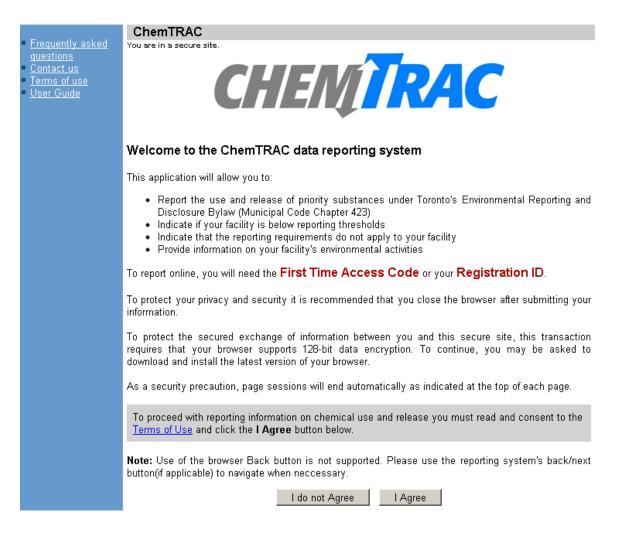
Facilities that meet or exceed reporting thresholds for one or more substances must use the Online Reporting System to report to the ChemTRAC program. You can access the system from any computer with an internet connection. If your facility is exempt or below reporting thresholds, you can use the system to notify the City and volunteer environmental information.

You can find the online reporting system on the ChemTRAC webpage: http://www.toronto.ca/health/chemtrac/report.htm.

You will need the following information to report to ChemTRAC

- Your First Time Access Code OR Registration ID
- Your facility name, address, number of employees and contact information
- Your NAICS code
- The names of substances you are reporting
- Quantities of priority substances (in kilograms).



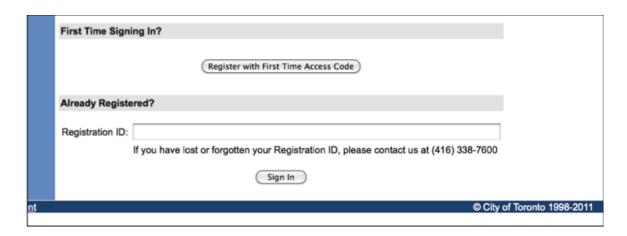


First Time Access Code for new users

If you are a first time user, you will need a "First Time Access Code" to use the system. The City sends most businesses their First Time Access Code by mail. If you did not receive or have lost your First Time Access Code, please call 3-1-1.

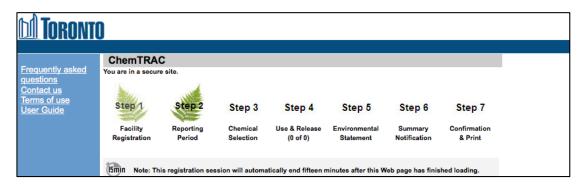
Registration ID for facilities already in the system

If you have already reported in the online system, you have been issued a Registration ID. This ID number is to be used for future visits to the ChemTRAC reporting system. If you have lost your Registration ID, please call 3-1-1.



Once you have entered the online reporting system

The online system has seven steps. You will see your progress at the top of the screen. In the screenshot below, Step 1 is complete and Step 2 is in progress.

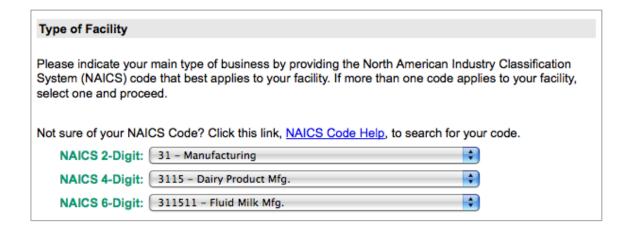


To move to the next step, you must enter all the required information on the screen and click the "Next" button at the bottom of the screen. You can use the "Back" button to change the information you provided in previous steps.

Please remember to have all your information ready before you enter the system. You will only have fifteen minutes to complete each screen before the system logs you out. If your session expires before you hit the "submit" button, you will need to re-enter all your information. If you are running out of time, you can reset the countdown without losing information by switching to a different page then returning to the page you were working on.

Step 1. Facility registration

In Step 1, you will enter your facility name, address, number of employees and company contact information. You will also enter your **NAICS code** in the section entitled "Type of facility". You must begin by selecting the 2-digit NAICS code from the dropdown menu. For Fluid Milk Manufacturing facilities, this will be "31 – Manufacturing". Then, you can select the appropriate 4-digit code (3115), and finally, the 6-digit code (311511).



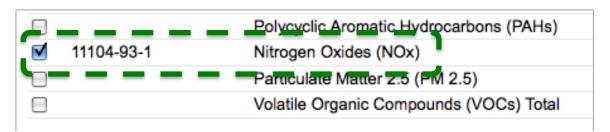
Step 2. Reporting period

In Step 2, you will choose the calendar year from the dropdown menu and select "Yes" in response to the statement "I am ready to report for the year above".

If your calculations showed you to be below the reporting threshold, you can enter "No" in response to the statement "I am ready to report for the year above" and then enter "I do not meet the threshold."

Step 3. Chemical selection

In Step 3, you will identify the substances that your facility used or released at or above reporting thresholds. The example below builds off of **Error! Reference source not found.** in this guide. Recall that Nitrogen Oxides (NO_x) was the only substance that exceeded thresholds.



Step 4. Use and release

In Step 4, you will enter information for each substance that you identified in Step 3. You will begin by determining whether a substance was used or released, and from where / to where.

For Fluid Milk Manufacturing facilities, all substances are "manufactured" and "released to air".

Next, you will need to enter the total quantity of the substances that your facility manufactured and released, in kilograms and without decimals. For example, 17.2 kg would be rounded to 17 kg and 17.6 kg rounded to 18 kg.

Finally, you will select an estimation method from the dropdown menu.

Select "ChemTRAC calculator" if you have used the ChemTRAC calculator.

The example below illustrates how to complete Step 4 for NO_x using information from **Error! Reference source not found.** of this guide.

	n Oxides (NOx) nreshold = 200.0 kg)
Quantity (kg)	Estimation Method
lf you used more than on	e method to estimate data, please choose the main one
Manufactured: 🕕 218	ChemTRAC calculator ▼
Processed: 0	- Select Estimation Method From List -
Otherwise Used: 🕦	- Select Estimation Method From List -
Total Use: 218	
Release to Air: 🕦 218	ChemTRAC calculator ▼
Release to Land: 🕦	- Select Estimation Method From List -
Release to Surface Water: 🕦	- Select Estimation Method From List -
Total Release: 218	

Step 5. Environmental statement

In Step 5, you have the option of entering information about your environmental activities including: if you have completed environmental training courses, created a Pollution Prevention Plan, or adopted an Environmental Management System. Pollution Prevention Plans are discussed briefly in the Pollution prevention strategies section on page 23 of this guide. You will also specify if you report to the National Pollutant Release Inventory or to the Toronto Sewer Use Bylaw.

Steps 6 and 7. Summary notification, confirmation and printing

In Steps 6 and 7, you will not enter any new information. You will review the information you provided, submit your report, and receive a printable record.

Optional reporting for facilities below threshold levels of priority chemicals

For those businesses or facilities that do not meet or exceed ChemTRAC thresholds, the online reporting system allows you to identify yourself as a "non-reporter". This will allow you to stay informed on ChemTRAC program initiatives. It will also help Toronto Public Health assess trends over time and gauge the effectiveness of the ChemTRAC program.

Part 2: Reducing your facility's environmental impact

Part 2: Reducing the environmental impact of your facility

This section of the guide provides information about reducing the environmental impact of your facility.

- It provides an overview of pollution prevention strategies
- It identifies relevant control technologies for reducing emissions
- It provides guidance on getting started with pollution prevention

Pollution prevention strategies

The ChemTRAC program requires facilities to report on substances that are manufactured, processed or otherwise used in quantities that are equal to or greater than ChemTRAC reporting thresholds. Although it is not required as part of the ChemTRAC program, it is good business practice for facilities to also take action to reduce the creation, use and release of ChemTRAC priority substances.

Minimizing use and release of harmful substances at the source is called pollution prevention (or P2) and is widely recognized as good business practice. Collecting data for ChemTRAC gives you information needed to consider P2 options in your facility.

How can a business benefit from pollution prevention (P2)?

- P2 can reduce operating costs from the use of chemicals and energy
- P2 can reduce the costs of waste management and the risk of liability
- P2 can improve worker health and safety
- P2 can improve community relations and build a business' reputation as socially and environmentally responsible
- P2 can improve a business' ability to respond to consumer demands for "greener" products

Pollution prevention strategies

Businesses have many options for reducing the use of harmful substances in their facilities. Not all of the options will be relevant to all businesses. Three types of strategies and examples specific to Fluid Milk Manufacturing facilities are presented below.

- 1. **Use low-cost, good operating practices**. Simple changes to normal practices can reduce the use and release of harmful chemicals at no cost to business owners.
 - For example: Keep pasteurization burners in good operating condition. Well-maintained equipment uses less gas, saves money, and reduces NO_x emissions.
- Install control technologies or equipment. New control technologies
 and equipment can reduce the release of harmful chemicals and save
 money by improving operating efficiency.
 - For example: Install low NO_x burners on gas-fired pasteurization equipment. These burners cut the nitrogen oxide emissions released as combustion by-products in half.
- 3. **Modify products or inputs**. Traditional products and processes can be replaced with alternatives that use and release less harmful chemicals.

Part 2: Reducing your facility's environmental impact

For example: Switch to water-based biodegradable cleaners. Though not discussed in the guide, caustic or acidic cleaners emit VOCs.

Control technologies for reducing emissions

Control technologies can reduce, but not eliminate, the quantity of ChemTRAC substances that are released from your facility. Control technologies can be used to reduce the quantity of substances released as combustion by-products from pasteurization heating equipment.

There are two common control technologies that can help decrease the amount of combustion by-products released from natural gas used for pasteurization. They are known as low NO_x burners and recirculated flue gas. Both technologies specifically reduce the amount of NO_x that is released as a combustion by-product. These control technologies generally do not reduce the amounts of other combustion by-products.

Low NO_x burners. When natural gas is used to create heat, the gas passes over a flame, gets combusted, and produces combustion by-products, including NO_x . A low NO_x burner combusts the gas in several stages. This allows the flame to burn at a cooler temperature, which reduces the amount of NO_x that is created as a by-product. A low NO_x burner can reduce NO_x creation by about 50%.

Recirculated flue gas. When natural gas gets combusted to produce heat, the resulting air containing the combustion by-products is called flue gas. If the flue gas is mixed back into the natural gas being fed to the flame (i.e. recirculated), this changes the combustion process and results in less NO_x being produced. Recirculated flue gas is often used with low NO_x burners. Recirculated flue gas with low NO_x burners can reduce NO_x emissions by about 70%.

The ChemTRAC calculator can be used to estimate a control technology's emission reduction potential.

Without changing any other values entered in the Input-Output screen, select "low NO_x burner" as a control for natural gas heating equipment. Check the new level of NO_x in the output table. It should be half the original number.

Figure 2 summarizes control technologies in Fluid Milk Manufacturing facilities.

Figure 2. Control technologies found in Fluid Milk Manufacturing facilities

Fluid Milk Manufacturing step	Control technology	ChemTRAC substance being controlled	Reduction ability of the control technology
Pasteurization	Low NO _x burners	Nitrogen oxides (NO _x)	Reduces NO _x creation by about 50%
Pasteurization	Recirculated flue gas with low NO _x burners	Nitrogen oxides (NO _x)	Reduces NO _x creation by about 70%

Part 2: Reducing your facility's environmental impact

More ways to reduce costs and improve performance

Minimizing the use and release of harmful substances is one aspect of improving environmental performance. Fluid Milk Manufacturing facilities can also take other steps to improve their economic and environmental sustainability. One such step is to reduce energy use. By reducing energy use, Fluid Milk Manufacturing facilities can save money on energy bills and reduce their environmental impact. Many energy-efficiency technologies have very short payback periods. Utilities also offer incentives for energy efficiency measures.

To reduce energy use, low-cost, good operating procedures can be adopted, and new technology or equipment can be installed. This includes:

- undergoing an energy audit to identify opportunities for savings;
- encouraging employees to turn off lights and equipment when not in use:
- replacing old motors and heating units with more efficient equipment;
- installing a programmable thermostat to control heating and cooling;
 and
- purchasing a heat exchanger system to recycle wasted burner heat.

Getting started with pollution prevention

The good news is that you've already started by calculating emissions of ChemTRAC priority substances.

Next steps can include:

- evaluating actions to reduce use and release of energy, water and ChemTRAC substances:
- identifying funding for upgrades to facilities and equipment;
- implementing all cost-effective upgrades; and
- tracking changes in the use and release of energy, water and substances.

To help in these steps, ChemTRAC is offering **free technical assistance visits**, **free training workshops** and additional resources to help businesses create an inventory of chemicals used at their facility, comply with the ChemTRAC program, and identify opportunities to improve their facilities' environmental performance.

For more information, visit:

http://www.toronto.ca/health/chemtrac/assistance_program.htm and http://www.toronto.ca/health/chemtrac/gogreen.htm.

Additional resources on reducing the environmental impact of Fluid Milk Manufacturing facilities include:

- Australia Government. 2007. Emission Estimation Technique by Industry. http://www.npi.gov.au/handbooks/approved_handbooks/sector-manuals.html
- Capital Regional District. Codes of Practice by Industry.
 http://www.crd.bc.ca/wastewater/sourcecontrol/codespractice.htm
- Toronto Public Health, ChemTRAC. December 2010. Resource for Greening Food and Beverage Manufacturing: Pollution Prevention Information. www.toronto.ca/health/chemtrac/pdf/GreenFoodBev.pdf
- University of Queensland Australia. Eco-Efficiency Toolkits and Fact Sheets. http://www.gpa.uq.edu.au/CleanProd/toolkits/toolkits.htm
- U.S. EPA. 1999. Environmental Compliance Guide for Food Processors.
 http://www.epa.gov/compliance/resources/publications/assistance/sectors/multifood.pdf

Appendices

The remaining pages of this guide offer additional material for your reference:

Appendix A. Additional material related to the ChemTRAC calculator.

- Descriptions of the remaining calculator screen
- How the calculator uses emission factors to calculate quantities of ChemTRAC substances
- How emission factors can be changed to site-specific values.

Appendix B. Combining the ChemTRAC calculator with other sources:

How to combine the ChemTRAC calculator for Fluid Milk Manufacturing with emissions data from other sources.

Appendix A. Additional material related to the ChemTRAC calculator

This appendix describes the remaining four screens of the ChemTRAC calculator. You do not need to enter any information into these screens. However, if site-specific emission factors are known, they can be entered manually in the Calculations screen.

This appendix also describes emission factors and how the ChemTRAC calculator makes use of them.

The ChemTRAC calculator All Substances screen

The All Substances screen provides a summary of the estimated quantities in kilograms per year of all ChemTRAC priority substances used and/or released by your facility that have been calculated by the ChemTRAC calculator. It also provides a summary of other substances used and/or released by your facility. You do not need to enter any information on this screen.

Refer to Table 1 of this guide to see which processes are responsible for the release of each substance.

Note that the CAS# refers to a unique identifier for the substance as given by the Chemical Abstracts Society. The CAS# is provided for reference only.

This page provides a summary of the estimated quantities of all ChemTRAC priority substances manufactured, processed, otherwise used and/or released.

		Quantity (kg/yr)			
ChemTRAC Priority Substances	CAS#	Manufactured	Processed	Otherwise Used	Released to Air
Benzene	71-43-2	0.0	0	0	0
Cadmium, and its compounds	n/a	0.0	0	0	0
Chromium (non-hexavalent), and its compounds	n/a	0.0	0	0	0
Formaldehyde	50-00-0	0.3	0	0	0
Lead, and its compounds	n/a	0.0	0	0	0
Manganese, and its compounds	n/a	0.0	0	0	0
Mercury, and its compounds	n/a	0.0	0	0	0
Nickel, and its compounds	n/a	0.0	0	0	0
Nitrogen Oxides (NOx)	11104-93-1	200.1	0	0	200
Particulate Matter (PM2.5)	n/a	7.6	0	0	8
Total PAHs	n/a	0.0	0	0	0
Total VOCs	n/a	22.0	0	0	22
Other Substances					
2-Methylnaphthalene	91-57-6	0.0	0	0	0
3-Methylchloranthrene	56-49-5	0.0	0	0	0
7,12-Dimethylbenz(a)anthracene	57-97-6	0.0	0	0	0
Acenaphthene	83-32-9	0.0	0	0	0
Acenaphthylene	208-96-8	0.0	0	0	0
Anthracene	120-12-7	0.0	0	0	0



The ChemTRAC calculator Calculations screen

The Calculations screen provides the calculations based on the information provided in the Input-Output screen. It also lists details on the emission factors used to calculate the release of substances and an indication of emission factor data quality. You do not need to enter any information on this screen.

While you do not need to enter any information on this screen, emission factors can be modified if site-specific information is available. All other data, sample calculations and information presented in the Calculations screen are for reference only. They should not be modified in any way.

You can modify the emission factors for any of the substances listed in the Contaminant table on the Calculation screen, and for any of uncontrolled, low NO_x and low NO_x with recirculated flue gas scenarios. If emission factors are modified be sure that they are entered in pounds per million cubic feet (lbs/1,000,000 ft³).

- This page provides detailed calculations based on the information provided in the Input table. It also provides sample calculations and an assessment of emission factor data quality.
- If you have site specific emission factors you may use them in the table below. If you choose to insert your own emission factor ensure that the units have been converted accordingly.

		ĺ	Emission Factor (lb/1000000 ft ³)		Emission Rate		
Contaminant	CAS#	Uncontrolled (None)	Low NOx	Low NOx Recirc.	(kg/yr)	Data Quality	Comments
Sulphur Dioxide	7446-09-5	0.6	0.6	0.6	2.4	A	
Nitrogen Oxides	11104-93-1	100	50	32	200.1	С	1
Carbon Monoxide	630-08-0	84	84	84	336.2	В	1
Nitrous Oxide	10024-97-2	2.2	2.2	0.64	8.8	Е	1
Particulate Matter (PM2.5)	n/a	1.9	1.9	1.9	7.6	D	1
Carbon Dioxide	124-38-9	120,000	120,000	120,000	480,282.4	A	1
ГОС	n/a	11	11	11	44.0	В	1
Lead	7439-92-1	0.0005	0.0005	0.0005	0.0	D	1
Methane	74-82-8	2.3	2.3	2.3	9.2	В	1
VOC	n/a	5.5	5.5	5.5	22.0	C	1
2-Methylnaphthalene	91-57-6	0.000024	0.000024	0.000024	9.61E-05	D	1
3-Methylchloranthrene	56-49-5	< 0.0000018	< 0.0000018	< 0.0000018	7.20E-06	E	PAH
7,12-Dimethylbenz(a)anthracene	57-97-6	< 0.000016	< 0.000016	< 0.000016	6.40E-05	E	PAH
Acenaphthene	83-32-9	< 0.0000018	< 0.0000018	< 0.0000018	7.20E-06	E	PAH
Acenaphthylene	208-96-8	< 0.0000018	< 0.0000018	< 0.0000018	7.20E-06	E	PAH
Anthracene	120-12-7	< 0.0000024	< 0.0000024	< 0.0000024	9.61E-06	E	l
Benzo(a)anthracene	56-55-3	< 0.0000018	< 0.0000018	< 0.0000018	₹ 7.20E-06	E	PAH

Emission factors in these columns can be modified by the user

Etc.

The ChemTRAC calculator Reference screen

The Reference screen describes from where the emission factors and assumptions used on the Calculations screen were taken. Source documents can be viewed by clicking on the links. The Reference screen also provides the definitions for 'Manufactured', 'Processed, 'Otherwise Used', and 'Released to Air'. No information needs to be entered on this screen.

Note that this tool is provided solely as an aid, and the City of Toronto makes no representation or warranty as to its applicability to your facility or to your obligation to comply with the Environmental Reporting and Disclosure Bylaw (Municipal Code Chapter 423). It is the responsibility of each facility owner or operator to take the necessary steps to ensure compliance with the bylaw.

This page provides all the reference information for the emission factors and assumptions used in the Calculations page. Click on the links below to view the source documents.

Emission factors and an assessment of their data quality are provided in the US EP A AP-42 "Natural Gas Combustion", Section 1.4, 1998

http://www.epa.gov/ttn/chief/ap42/ch01/final/c01s04.pdf

Process flow diagram adapted from Professor Douglas Gof f, University of Guelph Dairy Science and Technology Education Series, "Overview and Fluid Milk Products"

http://www.foodscience.uoguelph.ca/dairyedu/fluid.html

Definitions1

Manufacture - To produce, prepare or compound a priority substance and includes the conincidental production of a priority substance as a by-product.

Process - The preparation of a priority substance, after its manufacture, for commercial distribution and includes the preparation of a substance in the same physical state or chemical form as that received by the facility, or preparation which produces a change in physical state or chemical form.

Otherwise Use - Any use, disposal or release of a priority substance at a facility that does not fall under the definitions of "manufacture" or "process." This includes the use of the priority substance as a chemical processing aid, manufacturing aid or some other use.

Release - The emission or discharge of a priority substance, whether intentional, accidental or coincidental, from a facility into the environment.

The ChemTRAC calculator Process Flow screen

The Process Flow screen provides a diagram that shows examples of the steps that could be involved in Fluid Milk Manufacturing facilities, and identifies process steps where ChemTRAC priority substances could be used or released. This diagram is the same as Figure 1 in this guide. Not all facilities will follow all of these steps in this exact order. Also, not all facilities will have substance releases at the process steps identified, and some may have substance uses or releases at steps that have not been identified in the diagram. You do not need to enter any information on this screen.

¹ For details refer to the Environmental Reporting and Disclosure Bylaw available at the ChemTRAC website.

Emission factors for Fluid Milk Manufacturing facilities

The ChemTRAC calculators are all based on published estimates of the emissions associated with different industrial processes. These estimates are called "emission factors". Emission factors indicate the amount of a specific substance (e.g. nitrogen oxides) emitted by a specific activity (e.g. burning one cubic metre of natural gas).

The ChemTRAC calculator uses the emission factors listed in Table 3 to estimate emissions of nitrogen oxides from Fluid Milk Manufacturing facilities. If site-specific emission factors are available for the facility or processes, they can be entered in the Calculations sheet of the calculator. This is detailed in the discussion of the calculator's Calculations screen.

Table 3. Emission factors for nitrogen oxides

Source	Substance	Emission Factor
Pasteurization burners – no control	Nitrogen oxides	160.18 kg / 100,000 m ³
Pasteurization burners – low NOx burner	Nitrogen oxides	$80.09 kg / 100,000 m^3$
Pasteurization burners – low NOx burner & recirc. flue gas	Nitrogen oxides	51.26 kg / 100,000 m ³

Example: Using emission factors to estimate NO_x emissions from pasteurization burners

Table 3 shows that 160.18 kg of NO_x is emitted for every 100,000 m³ of natural gas burned by pasteurization burners without any control technologies.

Assume the facility used 1,000,000 m³ of natural gas in 2011.

Total emissions of NO_x for 2011 from natural gas-fired pasteurization burners

- = Emissions per unit of natural gas * Volume of natural gas used in 2011
- $= 160.18 \text{ kg} / 100,000 \text{ m}^3 * 1,000,000 \text{ m}^3$
- $= 1601.80 \text{ kg of NO}_{x}$

Appendix B. Combining the calculator with other sources

Depending on your business, you may need to use more than one calculator to calculate the use and release from all processes at your facility. The "Calculation of Totals" calculator can be used to compile your data. In this calculator, you can enter the values for each process at your facility. The calculator returns the total manufactured, processed or otherwise used amounts for the facility, by substance, and then compares it to the corresponding reporting threshold. The figure on the following page shows the main screen of the Calculation of Totals calculator.

Guide to calculations for ChemTRAC reporting: fluid milk manufacturing

⁴ The Calculation of Totals calculator can be found under the Totals bullet at http://www.toronto.ca/health/chemtrac/tools.htm.



Calculation of Totals

Instructions



Evamula

- Last Update: October 21, 2011 by YS, JA, & ZI

 This page gathers information to help you determine your facility-wide substance manufacture, process, otherwise use (MPO) and release estimates.
- For each source of priority substances, enter the process name and then provide the quantity of each substance manufactured, processed, otherwise used and released.
- In the "MPO" columns, identify whether the priority substance was Manufactured, Processed or Otherwise used. To do this you may consult the "Guide to Reporting" available at www.toronto.ca/chemtrac. The definitions are provided in the Examples tab.
- At the end of each row, you will find the facility-wide totals that need to be compared with the Mass Reporting Thresholds.
- The last 4 columns indicate the amount of each substance that you must report to the City of Toronto

The total quantities of ChemTRAC substances that would have to be reported are listed here

Group	(Carical Nathe	Manufactured	Processed	Otherwise Used	Released to Air	Manufactured	Processed	Otherwise Used	Releas Ai
		Process#1:	-		^	Process#2:		•	
	Acetaldehyde*					}		1	1
	Acrolein*				1	3			<u> </u>
	Benzene*				<u> </u>		<u> </u>	Î.	1
	1,3-Butadiene*			1	B	3		8	3
	Carbon tetrachloride*					}	á	Ĭ	Š
	Chloroform (Trichloromethane)*				Š	3	1	Ř	1
	Chromium (non-hexavalent) 1					3	<u> </u>		3
	1,2-Dibromoethane (Ethylene dibromide)				800	3		8	3
	1,4-Dichlorobenzene*			5	I -				
	1,2-Dichloroethane (Ethylene dichloride)*	E nter va	Enter values from the		Ř	† Enter values from the			
4	Dichloromethane (Methylene chloride)	Output 9	Summar	.,	8	Output Summary			
	Formaldehyde*				}				B
	Manganese ¹	table of	table of your first			table of your second			
	Nickel ¹		•	_	Į.	_			
	Tertrachloroethylene (Perchloroethylene)	calculate	or nere	_	R R	 calculator here 			
	Trichloroethylene*	7	ž.		8	Ī s	ā	8	3
	Vinyl chloride				į.				3
	Cadmium ¹				l .	3		1	3
	Chromium (hexavalent) ¹					3			3
	Lead ¹		Ē.		ž.	3		Ř	2
	Mercury ¹				Ē.			1	\$
В	Total polycyclic aromatic hydrocarbons (PAHs)*				8	1		1	}
	Nitrogen oxides (NOx)				Ĭ		á	Ĭ	3
2	Particulate matter 2.5 (PM2.5)						á .	1	1
	Total Volatile organic compounds (VOCs) ²				1		i	1	3

Cantity (Locky)

Combits 4 c4 s

- 1	l .	Mass		To be reported				
	otals to be npared with e threshold	Reporting Threshold (kg/yr)	Reportable?	Total Manufactured	Total Processed	Total Otherwise Used	Total Released to Air	
١	(kg/yr)			(kg/yr)	(kg/yr)	(kg/yr)	(kg/yr)	
	0	100	No					
1	0	100	No					
1	0	100	No					
Į	0	100	No					
١	0	100	No					
١	0	100	No					
	0	100	No					
-	0	100	No					
1	0	100	No					
I	0	100	No					
1	0	100	No					
	0	100	No					
•	0	10	No					
-	0	100	No					
1	0	100	No					
I	0	100	No					
١	0	100	No					
١	0	1	No					
١	0	10	No					
1	0	10	No					
	0	1	No					
I	0	10	No					
Í	0	200	No					
1	0	30	No					
١	0	100	No					

The total combined release of substances (whether from the ChemTRAC Fluid Milk Manufacturing calculator only, or from other substance quantification methods as well) should be compared to the mass reporting thresholds listed in Schedule A of the Environmental Reporting and Disclosure Bylaw and provided in Table 4 below.

Table 4. ChemTRAC priority substances and their reporting thresholds (adapted from Schedule A of the Environmental Reporting and Disclosure bylaw)

ChemTRAC substance	ChemTRAC Mass reporting threshold (kg/yr)	Concentration threshold ^c % w/w
Acetaldehyde	100	1
Acrolein	100	1
Benzene	100	1
1,3-Butadiene	100	1
Cadmium and its compounds	1	0.1
Carbon tetrachloride	100	1
Chloroform (Trichloromethane)	100	1
Chromium, Hexavalent and its compounds	10	0.1
Chromium, Non-hexavalent and its compounds	100	1
1,2-Dibromo ethane (Ethylene dibromide)	100	1
1,4-Dichlorobenzene	100	1
1,2-Dichloroethane (Ethylene dichloride)	100	1
Dichloromethane (Methylene chloride)	100	1
Formaldehyde	100	1
Lead and its compounds	10	0.1
Manganese and its compounds	10	1
Mercury and its compounds	1	0
Nickel and its compounds	100	1
Nitrogen Oxides (NOx)	200	N/A
Particulate Matter 2.5 (PM2.5)	30	N/A
Polycyclic Aromatic Hydrocarbons (PAHs)	10	N/A ^b
Tetrachloroethylene (Perchloroethylene)	100	1
Trichloroethylene	100	1
Vinyl chloride	100	1
Volatile Organic Compounds (VOCs) total	100	N/A

Notes:

a. N/A = not applicable

b. The concentration threshold % w/w is not relevant to the emissions quantified using the ChemTRAC calculator for Fluid Milk Manufacturing facilities

Appendix C. Reporting Checklist

Environmental Reporting and Disclosure Bylaw (Municipal Code Chapter 423)

Checklist for Facilities in Toronto

Make sure the data you submit in your reports are accurate. Here is a checklist to help you.

- Enter complete facility and contact information. If you are a consultant, identify yourself as the technical contact.
- Submit a separate report for each facility in Toronto.
- Complete the statement of certification.
- Report all of the priority substances (chemicals) that meet or exceed (equal to or greater than) the reporting thresholds.
- Report both use and release amounts of all priority substances that meet or exceed the reporting thresholds.
- Estimate use and release for all sources and processes in your facility.
 - ➤ This includes process such as heating by natural gas combustion, welding, equipment cleaning, drilling, grinding, crushing, sanding, and blending.
- Review the exemptions in the bylaw, such as building heating, and do not include these in your calculations.
- Compare current year estimates with that of previous years (if available) and explain any differences if present.
- If you report to NPRI and there is a difference between the amount of a substance reported to ChemTRAC and NPRI, explain the reason for the difference.
- You may need to make your records available for audit purposes.
 Securely store the records you based your report on and document:
 - Assumptions and parameters used for calculation and estimation of emissions
 - Procedures and methods used to measure emissions
 - Calibration records of any equipment used to measure emissions

Use and Release Calculations

 There are many sources of information that can help you identify the priority substances in your facility. Be sure to check all of them, including:

purchase records year-end inventory Material Safety Data Sheets (MSDS)
raw materials Certificate of Approval or Environmental Supplier Supplier

- Use the best available method for use and release estimation. Use (if any) the most appropriate and most recent ChemTRAC calculator (available at toronto.ca/health/chemtrac/tools.htm).
- Enter all the reportable data in kilograms (kg).
- Calculate the total amount of a substance used and released in all processes.
 - ➤ For example, process 1 used 90 kg VOC and released 75 kg. Process 2 used 60 kg VOC and released 56 kg. The total amount of use would be 90+60=150 kg and release 75+56=131 kg.
 - ➤ To help with these calculations you can use the free online ChemTRAC totals calculator.
- Double check that **decimal places** are entered in the correct place (e.g. 3.47 vs. 347)
- Check that the total release amount (release to land+water+air) is equal to or less than total use amount (manufactured+processed+otherwise used).
- Use the average value for use and release estimation if the substance content is listed in a range (e.g. 10-12% VOCs) on Material Data Safety Sheets or on other sources of substance data.
- The following priority substances are VOCs. Be sure to report them separately and also include them in your VOC estimation:

Acetaldehyde	Acrolein	Benzene
1.3-butadiene	Carbon	Chloroform
	Tetrachloride	
1,4-Dichlorobenzene	1,2-Dichloroethane	Formaldehyde
Trichloroethylene	Vinyl chloride	Polycyclic Aromatic
		Hydrocarbons (PAHs)

- O Consider the effects of pollution control devices (e.g. filter) in the emission calculations.
- O Consider the amount of waste transferred off-site (if any) in emission calculations.

Disclaimer: This checklist is for information only. The City of Toronto assumes no liability for accuracy or completeness. Readers are responsible for ensuring compliance with Toronto's Environmental Reporting and Disclosure Bylaw (Municipal Code Chapter 423). This information should not be relied upon as a substitute for legal or professional advice. Readers should seek their own legal or professional advice in regard to their use of the information contained in it.