Public Reporting Under O. Reg. 455/09 Public Plan Summary Letter as Required under Toxics Reduction Act Ontario Regulation 455/09

Coveright Surfaces Canada

30 May 2019

BASIC FACILITY INFORMATION

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Facility Identification and Site Address					
Company Name	Coveright Surfaces Canada Inc.				
Facility Name	Coveright Surfaces Canada Inc.				
	Physical Address:	Mailing Address:			
Facility Address	56 Willmott St. Cobourg, ON K9A 1H4	Same as physical address			
UTM Coordinates	Zone 17 731093E 4871219N				
Number of Employees	120				
NPRI ID	0177				
Ontario MOE ID Number	ON1293800				
NAICS Code	322220 - Paper bag and coated and treated paper manufacturing				
Facility Contact Information					
Essility Public	Tim Merkley, HSE Coordinator	Coveright Surfaces Canada Inc.			
Facility Public Contact	Email: <u>tim.merkley@arclin.com</u>	Samo as facility address			
	Phone: (905) 372-1896 x279	- Same as facility address			
Facility TSRP	Tim Merkley, HSE Coordinator	Coveright Surfaces Canada Inc.			
Coordinator Contact	Email: <u>tim.merkley@arclin.com</u>	Same as facility address			
Coordinator Contact	Phone: (905) 372-1896 x279				

Plan Information – Objectives and Targets

Substance Name	CAS Number	Date of most recent plan	Objectives from Plan	Quantity	Years
Formaldehyde	50-00-0	2012/12/31	Coveright goal is to reduce formaldehyde use by 95%.	3,000 tonnes	3
Methanol	67-56-1	2012/12/31	Coveright Surfaces will be terminating its Resin Manufacturing process by the end of 2013, relying on raw resin shipped from its operations at other Arclin facilities. The effect of this change will be to effectively eliminate the use of methanol at this site.	43 tonnes	1
Nitrogen Oxides	11104-93-1	2013/12/31	Coveright's goal is to reduce the amount of wastewater treated by 95%, and reduce scrap paper production by 75% by the end of 2014. Coveright Surfaces will also be terminating its Resin Manufacturing process by the end of 2013, relying on raw resin shipped from its operations at other Arclin facilities.	No quantity target	No timeline target
PM ₁₀	N/A	2013/12/31	Coveright's goal is to reduce the amount of wastewater treated by 95%, and reduce scrap paper production by 75% by the end of 2014. Coveright Surfaces will also be terminating its Resin Manufacturing process by the end of 2013, relying on raw resin shipped from its operations at other Arclin facilities.	No quantity target	No timeline target
PM _{2.5}	N/A 2013/12/31 Coveright's goal is to reduce the amount of wastewater treated by 95%, and reduce scrap paper production by 75% by the end of 2014. Coveright Surfaces will also be terminating its Resin Manufacturing process by the end of 2013, relying on raw resin shipped from its operations at other Arclin facilities.		No quantity target	No timeline target	

Progress on Implementing Plan

Category	Activity	Substances Affected	Description	Description of Steps Taken this Year and the Effectiveness of these steps
Materials / Feedstock	Substituted materials	Formaldehyde, Methanol, Nitrogen Oxides, PM ₁₀ , PM _{2.5}	Outsource the production of resin to Arclin operations off-site.	Coveright continues to produce its own resin. No reductions this year as a result of this option.
Product Design	Changed product specifications	Formaldehyde, Nitrogen Oxides, PM ₁₀ , PM _{2.5}	Increase proportion of ART product sold	ART Production at Coveright has not increased. No reductions this year as a result of this option.
Equipment modification	Improved application Techniques	Formaldehyde, Nitrogen Oxides, PM ₁₀ , PM _{2.5}	Prevent drips from paper impregnation process	No substantial change in waste resin transfer this year.
Spill or leak	Other	Formaldehyde, Nitrogen Oxides, PM ₁₀ , PM _{2.5}	Introduce splice tracking on paper impregnation process	No substantial change in scrap material transfer this year.
On site reuse	Other	Formaldehyde, Nitrogen Oxides, PM ₁₀ , PM _{2.5}	Recover exhaust gas heat being lost out of stack, reduction in natural gas consumption from treater dryer heating	No substantial changes in heater operations this year.
Improved Inventory	Other	Formaldehyde, Nitrogen Oxides, PM ₁₀ , PM _{2.5}	Introduce scheduling process review to minimize overruns, optimize order size and optimize number of resin types.	Facility returned to 24/7 operation in 2018.

<u>Review of implementation progress:</u> In 2018, the facility returned to 24/7 operation, increase the amount of formaldehyde and methanol was used. Although production increased by more than 30%, combustion air emissions decreased by more than 10%.

Any amendments to the plan:

None.

	Substance Name	CAS Number	Amount Used (Range)	Amount Created (Range)	Amount Released to Air	Amount Transferred Off-site for Disposal	Amount Transferred Off-site for Treatment	Amount Contained in Product (Range)
2018 (tonnes)	Formaldehyde	50-00-0	>1,000 to 10,000	0	2.3	4.97	1.61	>1 to 10
	Methanol	67-56-1	>10 to 100	0	2.8	0.00	0.00	0
	Nitrogen Oxides	11104-93-1	0	>10 to 100	15.3	N/A	N/A	N/A
	PM ₁₀	N/A	0	>1 to 10	2.8	N/A	N/A	N/A
	PM _{2.5}	N/A	0	>1 to 10	2.5	N/A	N/A	N/A
2017 (tonnes)	Formaldehyde	50-00-0	>1,000 to 10,000	0	2.3	3.67	1.02	>1 to 10
	Methanol	67-56-1	>10 to 100	0	2.1	0.00	0.00	0
	Nitrogen Oxides	11104-93-1	0	>10 to 100	17.0	N/A	N/A	N/A
	PM ₁₀	N/A	0	>10 to 100	3.0	N/A	N/A	N/A
	PM _{2.5}	N/A	0	>10 to 100	2.6	N/A	N/A	N/A
Change (tonnes)	Formaldehyde	50-00-0	>100 to 1,000	0	0.0	+1.29	+0.59	>0.1 to 1
	Methanol	67-56-1	>1 to 10	0	+0.7	0.00	0.00	0
	Nitrogen Oxides	11104-93-1	0	>-10 to -1	-1.7	N/A	N/A	N/A
	PM ₁₀	N/A	0	>-1 to 0	-0.2	N/A	N/A	N/A
	PM _{2.5}	N/A	0	>-1 to 0	-0.1	N/A	N/A	N/A
% change	Formaldehyde	50-00-0	+37%	0%	0%	+35%	+59%	+22%
-	Methanol	67-56-1	+38%	0%	+32%	0%	0%	0%
	Nitrogen Oxides	11104-93-1	0%	-25%	-10%	N/A	N/A	N/A
	PM ₁₀	N/A	0%	-77%	-17%	N/A	N/A	N/A
	PM _{2.5}	N/A	0%	-77%	-6%	N/A	N/A	N/A

Substance Information for 2018, 2017, Change in Tonnes and Percent Change

Certification by Highest Ranking Employee

As of May 30, 2019, I, Angela Herron, certify that I have read the report on the toxic substance reduction plan for the toxic substances referred to above and am familiar with its contents, and to my knowledge the information contained in the report is factually accurate and the report complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

Signed May 30, 2019. Original signature is on file at the facility.

Angela Herron

Coveright Surfaces Canada Inc.