



FINAL

Toxics Substance Reduction Plan Summary for Arsenic & Lead (CAS# 7440-38-2, 7439-92-1)

52 Middleton Street, Cambridge, ON

Prepared for:

**Canadian General-Tower
Limited**

52 Middleton Street
Cambridge, ON, N1R 5T6

Attn: Anne Ossowski
Environmental Health & Safety Manager

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INTRODUCTION

Canadian-General Tower (CGT) is a leader in the production of quality vinyl sheet products for a variety of applications that include automotive seating and interior trim, swimming pools, and construction products for roofing and spill containment membranes. CGT is proud of their expanding market share in North America and in the global market as a major supplier of vinyl products for the automotive sector and industrial markets that they serve.

Processes include blending and subsequent heating of raw materials, milling, calendaring, printing, laminating and graining. As a result of these activities CGT reported to the National Pollutant Release Inventory under the Canadian Environmental Protection Act (CEPA) 1999, for lead and arsenic that triggered the thresholds as set forth in the Regulations. Specifically with arsenic a plan was done in 2012 but arsenic went over the threshold again in 2015, meaning a new plan needed to be created.



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1.0 BASIC FACILITY INFORMATION

Substance Information		
Name	Arsenic & Lead	
CAS #	7440-38-2, 7439-92-1	
Facility Information		
Company Name	Canadian General-Tower Limited	
Facility Address	52 Middleton Street, Cambridge, ON	
Site Coordinates (main entrance of site)	555292 E, 4799431 N; Zone 17	
NPRI ID	3475	
MOE ID	5618	
Number of Full-Time Employees in 2015	450	
2-Digit NAICS Code	32 - Manufacturing	
4-Digit NAICS Code	3261 – Plastics Product Manufacturing	
6-Digit NAICS Code	326114 – Plastic Film and Sheet Manufacturing	
Facility Contact Information		
Public Contact	Anne Ossowski Environmental Health & Safety Manager Phone # 519-623-1633 ext. 3287	Anne.ossowski@cgtower.com Address – Same as facility

2.0 STATEMENT OF INTENT

Arsenic and lead are natural trace element found in some grades of flame retardant that contain Antimony. The threshold value of 50 Kg for the 2015 reporting year was met because one or two of the grades containing up to 0.5% by weight of the substance. Arsenic & lead do not have any functional use for the flame retardant material and there are grades of higher purity that contain as little as 0.05% Arsenic. CGT will continue to monitor the grades of Antimony Trioxide that they purchase in the future in order to prevent having to use and report this substance. With reference to the Ontario Toxics Reduction



Act, the reduction objectives are outlined in Section 4 of this Plan Summary for the reportable substance (Arsenic) at CGT.

3.0 SUBSTANCES REQUIRING PLANS

The substances requiring plans are Arsenic & Lead is based on 2015 Toxics Reduction Act accounting information. Arsenic & Lead is contained in the flame retardants used at the facility. Many grades of liners have flame resistant requirements to meet their individual standards, such as low flame spread ratings for construction purposes. Arsenic and Lead are by-products of the Antimony Trioxide and provide no functionality to the flame retardants.

4.0 OBJECTIVES OF THE PLAN & ANY TARGETS

Canadian General-Tower Limited prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. We will strive to reduce the use of Arsenic & Lead at the facility. Further, this plan will determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time.

No options have been identified, and as part of the continuous improvement practices at the facility, technical advances will be monitored for new opportunities to reduce the use of Arsenic & Lead at the facility.

5.0 OPTIONS TO BE IMPLEMENTED (OR STATEMENT THAT NONE ARE TO BE IMPLEMENTED)

Due to the nature of the processes, the use of Arsenic & Lead as a by-product of the flame retardants is an inevitable part of the process of creating liners. As such, no technically feasible options were identified or were applicable and therefore no options will be implemented at this time. The facility has identified a flame retardant which does not contain antimony trioxide (Arsenic and Lead). This product is being tested to see if the final products still meet the required fire code specifications, and CGT hopes to complete a partial substitution using this product. While CGT cannot commit to this option, or fully quantify the reduction at this time, the facility will continue to monitor this option for further improvement.

6.0 CONTENTS OF THIS PLAN SUMMARY REFLECTS PLAN

This Plan Summary accurately reflects the Toxic Substance Reduction Plans dated December 28, 2016, prepared for the substances listed in Section 1.0 of this Summary.



7.0 TERMS AND LIMITATIONS

This work was performed subject to the Terms and Limitations presented or referenced in the proposal for this project.

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CERTIFICATION BY LICENSED PLANNER

As of December 28, 2016, I, Ajay Madan, P.Eng., TSRP#0010 certify that I am familiar with the processes at Canadian General-Tower Limited that use or create the toxic substances referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the toxic substance reduction plans referred to below for the toxic substances and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Arsenic (CAS#7440-38-2)

Lead (CAS# 7439-92-1)

Planner:

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CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 28, 2016, I, Craig Richardson, 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.

Arsenic (CAS#7440-38-2)

Lead (CAS# 7439-92-1)

Employee:

Craig Richardson
Chairman
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