

RUETGERS Canada Inc.

Report:

Ruetgers Canada Inc.
Toxic Reduction Summary Report –
Sulphur Dioxide, Hydrogen Sulphide and Total
Reduced Sulphur (TRS)

Date: May 25, 2016

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

Substance Name and cas #	7446-09-5 Sulphur dioxide 7783-06-4 Hydrogen sulphide NA - M14 Total Reduced Sulphur (TRS)
Facility Identification and Site Address	
Legal Company Name:	RUETGERS Canada Inc.
Facility Name:	RUETGERS Canada Inc.
Facility Address:	725 Strathearne Avenue North, Hamilton, Ontario L8H 5L3
Facility Mailing Address (if different):	Same as above
Spatial Coordinates of Facility:	Latitude: 43.26030 Longitude -79.79140
Number of Full-time Employees:	80
Facility NPRI ID:	2070
Ontario MOECC ID Number (if assigned):	6330
2 Digit NAICS Code:	32
4 Digit NAICS Code:	3251
6 Digit NAICS Code:	325192 - Other basic organic chemical manufacturing
Parent Company Information	
Name of Parent Company:	RAIN CTP Inc.
Address of Parent Company:	2711 Centreville Road, Wilmington, Delaware
Percentage Ownership of Facility:	100%
Company Contact Information	
Public Contact Name:	Mr. Gord Gilmet
Position / Title:	Technical Manager
Telephone:	(905) 548-5532

Substances for Which Other Plans Have Been Prepared (Name, cas#)			
120-12-7	Anthracene	1319-77-3	Cresol (mixed isomers and their salts)
129-00-0	Pyrene - PAH	91-22-5	Quinoline (and its salts)
189-55-9	Dibenzo(a,i)pyrene - PAH	108-88-3	Toluene
191-24-2	Benzo(g,h,i)perylene - PAH	108-95-2	Phenol (and its salts)
192-97-2	Benzo(e)pyrene - PAH	91-20-3	Naphthalene
193-39-5	Indeno(1,2,3-c,d)pyrene - PAH	1330-20-7	Xylene (all isomers)
194-59-2	7H-Dibenzo(c,g)carbazole - PAH	71-43-2	Benzene
198-55-0	Perylene - PAH	95-63-6	1,2,4-Trimethylbenzene
205-82-3	Benzo(j)fluoranthene - PAH	11104-93-1	Nitrogen oxides (expressed as NO2)
205-99-2	Benzo(b)fluoranthene - PAH	630-08-0	Carbon monoxide
206-44-0	Fluoranthene - PAH	NA - M09	PM10 - Particulate Matter less than 10 microns
207-08-9	Benzo(k)fluoranthene - PAH	NA - M10	PM2.5 - Particulate Matter less than 2.5 microns
208-96-8	Acenaphthylene - PAH	NA - 16	Ammonia
218-01-9	Benzo(a)phenanthrene - PAH		
224-42-0	Dibenz(a,j)acridine - PAH		
50-32-8	Benzo(a)pyrene - PAH		
53-70-3	Dibenzo(a,h)anthracene - PAH		
56-55-3	Benzo(a)anthracene - PAH		
57-97-6	7,12-Dimethylbenz(a)anthracene - PAH		
83-32-9	Acenaphthene - PAH		
85-01-8	Phenanthrene - PAH		
86-73-7	Fluorene - PAH		
92-52-4	Biphenyl		

STATEMENT OF INTENT SULPHUR DIOXIDE:

RUETGERS does not intend to reduce the creation of this toxic substance at the facility. The facility does not use Sulphur Dioxide, therefore this plan will not address its use.

OBJECTIVE FOR SULPHUR DIOXIDE:

This Toxics Reduction Plan identifies reduction opportunities and assesses the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time. RUETGERS will use best efforts to process all raw materials so as to utilize them completely and therefore minimize losses.

TARGET FOR SULPHUR DIOXIDE:

No reduction targets have been established at this time.

STATEMENT OF INTENT HYDROGEN SULPHIDE:

RUETGERS does not intend to reduce the creation of this toxic substance at the facility. The facility does not use Hydrogen Sulphide, therefore this plan will not address its use.

OBJECTIVE FOR HYDROGEN SULPHIDE:

This Toxics Reduction Plan identifies reduction opportunities and assesses the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time. RUETGERS will use best efforts to process all raw materials so as to utilize them completely and therefore minimize losses.

TARGET FOR HYDROGEN SULPHIDE:

No reduction targets have been established at this time.

STATEMENT OF INTENT TOTAL REDUCED SULPHUR (TRA):

RUETGERS does not intend to reduce the creation of this toxic substance at the facility. The facility does not use TRS, therefore this plan will not address its creation.

OBJECTIVE FOR TOTAL REDUCED SULPHUR (TRS):

This Toxics Reduction Plan identifies reduction opportunities and assesses the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time. RUETGERS will use best efforts to process all raw materials so as to utilize them completely and therefore minimize losses.

TARGET FOR TOTAL REDUCED SULPHUR (TRS):

No reduction targets have been established at this time.

DESCRIPTION FOR SULPHUR DIOXIDE, HYDROGEN SULPHIDE AND TOTAL REDUCED SULPHUR (TRS) AT THE FACILITY:

Sulphur Dioxide (cas#7446-09-5), Hydrogen Sulfide (cas#7783-064-4), and Total Reduced Sulphur (cas#NA-M14) are created in the distillation processing of coal tar materials at RUETGERS. Sulphur Dioxide (SO₂), Hydrogen Sulphide (H₂S) and TRS are Phase II Toxic Substances which share a common process pathway at RUETGERS and are addressed in a common toxic substance reduction plan based on the criteria set out in the Toxics Reduction Act, 2009 and Ontario Regulation 455/09. SO₂, H₂S and TRS at RUETGERS are created in four (4) different processes at the facility.

TOXIC SUBSTANCE REDUCTION OPTION(S) TO BE IMPLEMENTED

No options identified are considered to be both technically and economically feasible at this time.

PLAN SUMMARY STATEMENT

This plan summary accurately reflects the content of the toxic substance reduction plan for:

- 7446-09-5 Sulphur dioxide
- 7783-06-4 Hydrogen sulphide
- NA - M14 Total Reduced Sulphur (TRS) ***

Prepared for Ruetgers Canada Inc., December 19, 2013.

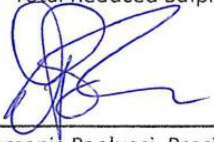
CERTIFICATION STATEMENTS



9. PLAN CERTIFICATION FOR SULPHUR DIOXIDE, HYDROGEN SULPHIDE AND TOTAL REDUCED SULPHUR

As of DEC 20TH, 2013, I, Domenic Paolucci, 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.

- Sulphur dioxidecas#7446-09-5
- Hydrogen sulphidecas#7783-06-4
- Total Reduced Sulphur (TRS)**cas#NA - M14

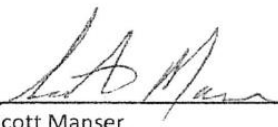


Domenic Paolucci, President, CEO

DEC 20, 2013.

Date

As of DECEMBER 20, 2013, I, Scott Manser certify that I am familiar with the processes at RUETGERS 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 December 19, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.



Scott Manser
Toxic Substance Reduction Planner
License No. TSRP0071

12/20/2013

Date