

RUETGERS Canada Inc.

Report:

Ruetgers Canada Inc.
Toxic Reduction Summary Report -
Carbon Monoxide, Nitrogen Oxide and Particulate Matter
(PM10 and PM2.5)

Date: May 25, 2016

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

Substance Name and cas #	630-08-0 Carbon monoxide 11104-93-1 Nitrogen oxides (expressed as NO2) NA - M09 PM10 - Particulate Matter <10 microns NA - M10 PM2.5 - Particulate Matter <2.5 microns
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	7446-09-5	Sulphur dioxide
205-99-2	Benzo(b)fluoranthene - PAH	7783-06-4	Hydrogen sulphide
206-44-0	Fluoranthene - PAH	NA - M14	Total Reduced Sulphur (TRS) ***
207-08-9	Benzo(k)fluoranthene - PAH	NA - 16	Ammonia
208-96-8	Acenaphthylene - PAH		
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		

AMENDMENT OF TOXIC REDUCTION PLAN

The original Toxic Reduction Plan covering the substances Nitrogen Oxides, Carbon Monoxide and Particulate Matter dated December 18, 2013 is amended by this Toxic Reduction Plan. The amendments contained within this plan reflect changes to the historical reporting of Particulate Matter and an updated approach whereby emissions of Particulate Matter are now represented by Particulate Matter, less than 10 microns (PM₁₀) and Particulate Matter, less than 2.5 microns. Particulate Matter does not meet the National Pollutant Release Inventory (NPRI) reporting threshold of 20,000 kgs and is therefore not subjected to the requirements under the Toxic Reduction Act.

References in the original report to “Particulate Matter” are now replaced by “Particulate Matter, less than 10 microns (PM₁₀)” and “Particulate Matter, less than 2.5 microns (PM_{2.5})”. No other report revisions are incorporated in this amendment to the Plan.

STATEMENT OF INTENT CARBON MONOXIDE:

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

OBJECTIVE FOR CARBON MONOXIDE:

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 CARBON MONOXIDE:

No reduction targets have been established at this time.

DESCRIPTION FOR CARBON MONOXIDE AT THE FACILITY:

Carbon Monoxide (cas#630-08-0) is not used but rather created at RUETGERS through various combustion processes at the facility. Carbon Monoxide is a Phase II Toxic Substance which is created by combustion of natural gas and process generated “overhead gas” at RUETGERS. RUETGERS does not use carbon monoxide at the facility. Carbon Monoxide at RUETGERS is created in one (1) process at the facility.

STATEMENT OF INTENT NITROGEN OXIDES:

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

OBJECTIVE FOR NITROGEN OXIDES:

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 NITROGEN OXIDES:

No reduction targets have been established at this time.

DESCRIPTION FOR NITROGEN OXIDES AT THE FACILITY:

Nitrogen Oxides (cas#11104-93-1) is not used but rather created at RUETGERS through various combustion processes at the facility. Nitrogen Oxide is a Phase II Toxic Substance which is created by combustion of natural gas and process generated “overhead gas” at RUETGERS. RUETGERSs does not use nitrogen oxide at the facility. Nitrogen Oxide at RUETGERS is created in one (1) process at the facility.

STATEMENT OF INTENT PARTICULATE MATTER, LESS THAN 10 MICRONS (PM₁₀):

RUETGERS does not intend to reduce the creation of this toxic substance at the facility. PM₁₀ is not used at the facility and this plan will not address its use.

OBJECTIVE FOR PARTICULATE MATTER, LESS THAN 10 MICRONS (PM₁₀):

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 PARTICULATE MATTER, LESS THAN 10 MICRONS (PM₁₀):

No reduction targets have been established at this time.

DESCRIPTION FOR PARTICULATE MATTER, LESS THAN 10 MICRONS (PM₁₀) AT THE FACILITY:

Particulate Matter, less than 10 microns (cas#NA-M09) is created (released to atmosphere) by combustion of natural gas and process generated “overhead gas” at RUETGERS. PM₁₀ is a Phase II Toxic Substances which is created by combustion of natural gas and process generated “overhead gas” at RUETGERS. PM₁₀ at RUETGERS is released (created) in one (1) process at the facility. Negligible quantities of PM₁₀ are released from maintenance activities which are not addressed by this report.

STATEMENT OF INTENT PARTICULATE MATTER, LESS THAN 2.5 MICRONS (PM_{2.5}):

RUETGERS does not intend to reduce the creation of this toxic substance at the facility. PM_{2.5} is not used at the facility and this plan will not address its use.

OBJECTIVE FOR PARTICULATE MATTER, LESS THAN 2.5 MICRONS (PM_{2.5}):

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 PARTICULATE MATTER, LESS THAN 2.5 MICRONS (PM_{2.5}):

No reduction targets have been established at this time.

DESCRIPTION FOR PARTICULATE MATTER, LESS THAN 2.5 MICRONS (PM_{2.5}) AT THE FACILITY:

Particulate Matter, less than 2.5 microns (cas#NA-M10) is created (released to atmosphere) by combustion of natural gas and process generated “overhead gas” at RUETGERS. PM₁₀ is a Phase II Toxic Substances which is created by combustion of natural gas and process generated “overhead gas” at RUETGERS. PM_{2.5} at RUETGERS is released (created) in one (1) process at the facility. Negligible quantities of PM_{2.5} are released from maintenance activities which are not addressed by this report.

TOXIC SUBSTANCE REDUCTION OPTION(S) TO BE IMPLEMENTED:

Ruetgers intends to implement one option to reduce heat loss in storage tanks which will reduce the quantities created of these toxic substances.

PLAN SUMMARY STATEMENT:

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

- 11104-93-1 Nitrogen oxides (expressed as NO₂)
- 630-08-0 Carbon monoxide
- NA - M09 PM10 - Particulate Matter <10 microns
- NA - M10 PM2.5 - Particulate Matter <2.5 microns

Prepared for Ruetgers Canada Inc., June 1, 2015.

CERTIFICATION STATEMENTS



9. PLAN CERTIFICATION FOR CO, NO_x, PM10 and PM2.5

As of JUNE 1, 2015, 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.

- cas# 630-08-0 Carbon Monoxide
- cas# 11104-93-1 Nitrogen Oxide
- cas# NA-M09 Particulate Matter, less than 10 microns (PM10)
- cas# NA-M10 Particulate Matter, less than 2.5 microns (PM2.5)

*Note: The Toxic Reduction Plan, dated December 18, 2013, covering Carbon Monoxide, Nitrogen Oxide and Particulate Matter is amended by this Plan to reflect an updated approach implemented during 2015 in the reporting of PM10 and PM2.5 emissions.

A handwritten signature in black ink, appearing to read "D. Paolucci", written over a horizontal line.

Domenic Paolucci, President, CEO

JUNE 1, 2015

As of June 1, 2015, 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 June 1, 2015 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

A handwritten signature in black ink, appearing to read "Scott Manser", written over a horizontal line.

Scott Manser, TSRP0071
Toxic Substance Reduction Planner

JUNE 1, 2015