



RUETGERS Canada Inc.

Report:

Ruetgers Canada Inc.
Toxic Reduction Summary Report – PAH and Biphenyl

Date: May 25, 2016

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

Substance Name and cas #	120-12-7 Anthracene 129-00-0 Pyrene - PAH 189-55-9 Dibenzo(a,i)pyrene - PAH 191-24-2 Benzo(g,h,i)perylene - PAH 192-97-2 Benzo(e)pyrene - PAH 193-39-5 Indeno(1,2,3-c,d)pyrene - PAH 194-59-2 7H-Dibenzo(c,g)carbazole - PAH 198-55-0 Perylene - PAH 205-82-3 Benzo(j)fluoranthene - PAH 205-99-2 Benzo(b)fluoranthene - PAH 206-44-0 Fluoranthene - PAH 207-08-9 Benzo(k)fluoranthene - PAH 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
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#)			
11104-93-1	Nitrogen oxides (expressed as NO ₂)	1319-77-3	Cresol (mixed isomers and their salts)
630-08-0	Carbon monoxide	91-22-5	Quinoline (and its salts)
NA - M09	PM10 - Particulate Matter less than 10 microns	108-88-3	Toluene
NA - M10	PM2.5 - Particulate Matter less than 2.5 microns	108-95-2	Phenol (and its salts)
NA - 16	Ammonia (total)	91-20-3	Naphthalene
7446-09-5	Sulphur dioxide	1330-20-7	Xylene (all isomers)
7783-06-4	Hydrogen sulphide	71-43-2	Benzene
NA - M14	Total Reduced Sulphur (TRS) ***	95-63-6	1,2,4-Trimethylbenzene

STATEMENT OF INTENT:

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

OBJECTIVE:

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:

No reduction targets have been established at this time.

DESCRIPTION OF TOXIC SUBSTANCE AT FACILITY:

PAHs and Biphenyl are contained in coals tar materials used by RUETGERS. There are 22 individual substances within the PAH group at RUETGERS that require the development of a toxic substance reduction plan based on the criteria set out in the Toxics Reduction Act, 2009 and Ontario Regulation 455/09. Biphenyl is included within this plan as the substance will travel through the process along with PAHs.

TOXIC SUBSTANCE REDUCTION OPTION(S) TO BE IMPLEMENTED:

No toxic substance reduction options will be implemented for PAHs and Biphenyl which will result in a reduction in the quantity used or contained in product.

PLAN SUMMARY STATEMENT:

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

- 120-12-7 Anthracene
- 129-00-0 Pyrene - PAH
- 189-55-9 Dibenzo(a,i)pyrene - PAH
- 191-24-2 Benzo(g,h,i)perylene - PAH
- 192-97-2 Benzo(e)pyrene - PAH
- 193-39-5 Indeno(1,2,3-c,d)pyrene - PAH
- 194-59-2 7H-Dibenzo(c,g)carbazole - PAH
- 198-55-0 Perylene - PAH
- 205-82-3 Benzo(j)fluoranthene - PAH
- 205-99-2 Benzo(b)fluoranthene - PAH
- 206-44-0 Fluoranthene - PAH
- 207-08-9 Benzo(k)fluoranthene - PAH
- 208-96-8 Acenaphthylene - PAH
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- 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

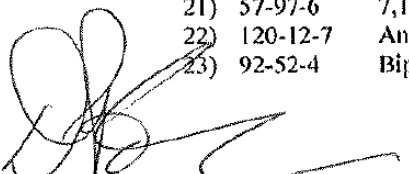
Prepared for Ruetgers Canada Inc., December 20, 2012.

CERTIFICATION STATEMENTS

9. PLAN CERTIFICATION FOR PAH AND BIPHENYL

As of December 20, 2012, 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.

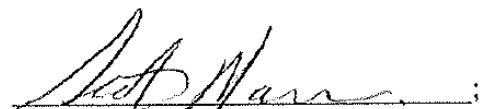
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|-----|----------|--------------------------------------|
| 1) | 129-00-0 | Pyrene - PAH |
| 2) | 189-55-9 | Dibenzo(a,i)pyrene - PAH |
| 3) | 191-24-2 | Benzo(g,h,i)perylene - PAH |
| 4) | 192-97-2 | Benzo(e)pyrene - PAH |
| 5) | 193-39-5 | Indeno(1,2,3-c,d)pyrene - PAH |
| 6) | 194-59-2 | 7H-Dibenzo(c,g)carbazole - PAH |
| 7) | 198-55-0 | Perylene - PAH |
| 8) | 205-82-3 | Benzo(j)fluoranthene - PAH |
| 9) | 205-99-2 | Benzo(b)fluoranthene - PAH |
| 10) | 206-44-0 | Fluoranthene - PAH |
| 11) | 207-08-9 | Benzo(k)fluoranthene - PAH |
| 12) | 208-96-8 | Acenaphthylene - PAH |
| 13) | 218-01-9 | Benzo(a)phenanthrene - PAH |
| 14) | 224-42-0 | Dibenz(a,j)acridine - PAH |
| 15) | 50-32-8 | Benzo(a)pyrene - PAH |
| 16) | 53-70-3 | Dibenzo(a,h)anthracene - PAH |
| 17) | 56-55-3 | Benzo(a)anthracene - PAH |
| 18) | 83-32-9 | Acenaphthene - PAH |
| 19) | 85-01-8 | Phenanthrene - PAH |
| 20) | 86-73-7 | Fluorene - PAH |
| 21) | 57-97-6 | 7,12-Dimethylbenz(a)anthracene - PAH |
| 22) | 120-12-7 | Anthracene |
| 23) | 92-52-4 | Biphenyl |



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Domenic Paolucci, President, CEO

December 20, 2012

As of December 20, 2012, 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 20, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.



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Scott Manser, TSRP0071
Toxic Substance Reduction Planner

December 20, 2012