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

Coveright Surfaces Canada

18 May 2018

BASIC FACILITY INFORMATION

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Facility Identification and Site Address		
Company Name	Coveright Surfaces Canada Inc.	
Facility Name	Coveright Surfaces Canada Inc.	
Facility Address	Physical Address:	Mailing 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		
Facility Public Contact	Tim Merkley, HSE Coordinator	Coveright Surfaces Canada Inc.
	Email: tim.merkley@arclin.com	Same as facility address
	Phone: (905) 373-3451	
Facility TSRP Coordinator Contact	Tim Merkley, HSE Coordinator	Coveright Surfaces Canada Inc.
	Email: tim.merkley@arclin.com	Same as facility address
	Phone: (905) 373-3451	

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	Hose inspection program helped to reduce resin transfers to treatment (i.e. formaldehyde transferred for treatment) by 4%.
Spill or leak	Other	Formaldehyde, Nitrogen Oxides, PM_{10}, $PM_{2.5}$	Introduce splice tracking on paper impregnation process	Multiple measures to reduce production of scrap material reduced formaldehyde transfers for disposal by 5%.
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	Efficiency improvements in boilers and chillers reduced NOx releases by approximately 5% and particulate matter releases by approximately 10%.
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.	The facility shifted their production scheduling from a 7-day schedule to a 5-day schedule, substantially improving efficiency. This shift resulted in the following changes: • Approx. 20% reduction in NOx releases. • Approx. 40% reduction in particulate matter releases. • 34% reduction in methanol emissions. • 62% reduction in formaldehyde transferred for treatment. • 100% reduction in methanol transferred for treatment.

Review of implementation progress:

In 2017, the facility implemented a number of measures that aligned with the activities listed in the Toxic Substance Reduction Plan:

- Production scheduling efficiency improved due to a change from a 7-day to a 5-day schedule. With this new schedule, the facility was also able to decrease the number of resin changes. In addition, production is now scheduled in more discrete 'blocks' based on resin type.

- Energy consumption (natural gas and electricity) was reduced with the following initiatives:
    - improved ducting in the reactor area;
    - lighting modifications (mercury to LED, use of movement sensors to decrease usage); and
    - improvements to boilers/chillers

- Multiple measures were introduced to reduce overall production of scrap material

- The risk of impacts from spills were also reduced with the following initiatives:
    - Replacement of tanker unloading pad to fix cracks, reducing the risk of ground contamination from a spill); and
    - a hose inspection program to monitor condition of hoses to prevent leaks)

It is worth noting that all the improvements listed above resulted in the releases and disposals of pollutants in 2017 decreasing substantially relative to 2016 releases and disposals while 2017 production levels remained steady at 2016 levels.

Any amendments to the plan:

None.

Substance Information for 2017, 2016, Change in Tonnes and Percent Change

	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)
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	0.000	0
	Nitrogen Oxides	11104-93-1	0	>10 to 100	17.0	N/A	N/A	N/A
	PM_{10}	N/A	0	>1 to 10	3.0	N/A	N/A	N/A
	$PM_{2.5}$	N/A	0	>1 to 10	2.6	N/A	N/A	N/A
2016 (tonnes)	Formaldehyde	50-00-0	>1,000 to 10,000	0	2.2	3.86	3.049	>1 to 10
	Methanol	67-56-1	>10 to 100	0	3.2	0	0.0238	0
	Nitrogen Oxides	11104-93-1	0	>10 to 100	22.7	N/A	N/A	N/A
	PM_{10}	N/A	0	>10 to 100	6.0	N/A	N/A	N/A
	$PM_{2.5}$	N/A	0	>10 to 100	5.4	N/A	N/A	N/A
Change (tonnes)	Formaldehyde	50-00-0	>-100 to -10	0	0.1	-0.19	-2.03	>0.1 to 1
	Methanol	67-56-1	>-10 to -1	0	-1.1	0	-0.0238	0
	Nitrogen Oxides	11104-93-1	0	>-10 to -1	-5.7	N/A	N/A	N/A
	PM_{10}	N/A	0	>-100 to -10	-3.0	N/A	N/A	N/A
	$PM_{2.5}$	N/A	0	>-100 to -10	-2.8	N/A	N/A	N/A
% change	Formaldehyde	50-00-0	-7%	0%	4%	-5%	-67%	3%
	Methanol	67-56-1	-7%	0%	-34%	0%	-100%	0%
	Nitrogen Oxides	11104-93-1	0%	-25%	-25%	N/A	N/A	N/A
	PM_{10}	N/A	0%	-77%	-50%	N/A	N/A	N/A
	$PM_{2.5}$	N/A	0%	-77%	-52%	N/A	N/A	N/A

Certification by Highest Ranking Employee

As of May 18, 2018, 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 18, 2018. Original signature is on file at the facility.

Angela Herron

Coveright Surfaces Canada Inc.