Toxic Substance Reduction Plan Summary

Coveright Surfaces Canada Inc. Cobourg, Ontario

December 21, 2012

BASIC FACILITY INFORMATION

Substances Included in the Plan

- Formaldehyde (CAS No. 50-00-0)
- Methanol (CAS No. 67-56-1)

| 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. | Same as physical address |
| | Cobourg, ON | |
| | K9A 1H4 | |
| Number of Employees | 180 | |
| NPRI ID | 0177 | |
| Ontario MOE ID Number | ON1293800 | |
| Facility and Planner Contact Information | | |
| Essility Dublis | Tim Merkley, HSE Coordinator | Coveright Surfaces Canada Inc. |
| Facility Public Contact | Email: tim.merkley@arclin.com | Same as facility address |
| | Phone: (905) 372-1896 x279 | |
| Facility Technical Contact | Tim Merkley, HSE Coordinator | Coveright Surfaces Canada Inc. |
| | Email: tim.merkley@arclin.com | Same as facility address |
| | Phone: (905) 372-1896 x279 | |
| Facility TSRP Coordinator Contact | Tim Merkley, HSE Coordinator | Coveright Surfaces Canada Inc. |
| | Email: tim.merkley@arclin.com | Same as facility address |
| | Phone: (905) 372-1896 x279 | |
| Person who Prepared | Colin Welburn | RWDI AIR Inc. |
| the Plan | Email: ctw@rwdi.com | 650 Woodlawn Road West |
| (if different from the TSRP coordinator) | Phone: (519) 823-1311 x 2325 | Guelph, Ontario N1K 1B8 |
| Planner Responsible for Making Recommendations | Colin Welburn | RWDI AIR Inc. |
| | Planner License No.: TSRP0049 | 650 Woodlawn Road West |
| | Email: ctw@rwdi.com | Guelph, Ontario |
| | Phone: (519) 823-1311 x 2325 | N1K 1B8 |
| Highest Ranking Employee | Arnaud Raymond, Plant Manager | Coveright Surfaces Canada Inc. |
| | Email: arnaud.raymond@arclin.com | Same as facility address |
| | Phone: | |
| Planner Responsible for Certification | Colin Welburn | RWDI AIR Inc. |
| | Planner License No.: TSRP0049 | 650 Woodlawn Road West |
| | Email: ctw@rwdi.com | Guelph, Ontario |
| | Phone: (519) 823-1311 x 2325 | N1K 1B8 |

1. FORMALDEHYDE (CAS NO. 50-00-0)

Statement of Intent

Coveright Surfaces Canada, Inc. (Coveright) intends to substantially reduce its use of formaldehyde. These substances to not create formaldehyde and so this plan does not include reducing the creation of these substances.

Objectives

Coveright's goal is to reduce formaldehyde use by 95%, 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. The effect of this change will be to eliminate the use of methanol at this site.

Description of Used of Substance

Formaldehyde is used by Coveright Surfaces to manufacture resin that is impregnated onto paper for use in treatment of counter tops and other applications. Methanol is a by-product of the formaldehyde production process.

Description Option(s) to be Implemented

Coveright will implement the following option(s) to reduce the use/creation of Methanol and Formaldehyde:

Outsource the production of resin to Arclin operations off-site. With this initiative, Coveright will no longer receive 44% formaldehyde / 0.63% methanol shipments. This will bring formaldehyde use down by approximately 96%. Since methanol is completely consumed during the resin manufacture process, methanol use will be reduced to zero in the future.

In addition to the outsourcing of resin production, Coveright will implement the following options to reduce the use/creation of formaldehyde:

- Increase proportion of ART product sold;
- Prevent drips from paper impregnation process;
- Introduce Splice tracking on paper impregnation process;
- Update waste reduction program to reduce scrap production; and
- Introduce scheduling process review to minimize overruns, optimize order size and optimize number of resin types.

The combined effect of these options will be to reduce formaldehyde use by almost 3,000 tonnes (96%) by the end of 2014.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Coveright Surfaces Canada Inc. for Formaldehyde, dated December 21, 2012.

2. METHANOL (CAS NO. 67-56-1)

Statement of Intent

Coveright Surfaces Canada, Inc. (Coveright) intends to substantially reduce its use of methanol. These substances to not create methanol and so this plan does not include reducing the creation of these substances.

Objectives

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.

Description of Used of Substance

Methanol is a by-product of the formaldehyde used in the resin production process.

Description Option(s) to be Implemented

Coveright will implement the following option(s) to reduce the use/creation of Methanol

 Outsource the production of resin to Arclin operations off-site. Since methanol is completely consumed during the resin manufacture process, methanol use will be reduced to zero in the future

The combined effect of these options will be to reduce methanol use to less than 1 tonne by the end of 2014.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Coveright Surfaces Canada Inc. for Methanol, dated December 21, 2012.

Certification by Highest Ranking Employee

As of December 21, 2012, I, Arnaud Raymond, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the *Toxics Reduction Act*, 2009 and Ontario Regulation 455/09 (General) made under that Act.

- Formaldehyde (CAS No. 50-00-0)
- Methanol (CAS No. 67-56-1)

Arnaud #

Plant Manager

Coveright Surfaces Canada, Inc.

Certification by Licensed Planner

As of December 21, 2012 I, Colin Welburn, certify that I am familiar with the processes at Coveright Surfaces Canada Inc. 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 the Act and Ontario Regulation 455/09 (General) made under that Act.

Dec_21, 2012

Substance

■ Formaldehyde (CAS No. 50-00-0).....

■ Methanol (CAS No. 67-56-1)

Date of Certified Plan

December 21, 2012

December 21, 2012

Colin Welburn, Planner License #TSRP0049

Senior Project Manager / Toxic Substance Reduction Planner

RWDI