

# 2012 Toxic Substance Reduction Plan Summary

Coveright Surfaces Canada Inc.  
Cobourg, Ontario

December 21, 2013

| BASIC FACILITY INFORMATION  |   |  |
|---|---|--|
| Substances Included in the Plan   |   |  |
| <ul style="list-style-type: none"> <li>Nitrogen Oxides (expressed as Nitrogen Dioxide) CAS No. 11104-93-1)</li> <li>PM<sub>10</sub> Particulate Matter &lt;= 10 Microns (CAS No. NA-M09)</li> <li>PM<sub>2.5</sub> Particulate Matter &lt;= 2.5 Microns (CAS No. NA-M10)</li> </ul> |   |  |
| Facility Identification and Site Address  |   |  |
| <b>Company Name</b>   | Coveright Surfaces Canada Inc.  |  |
| <b>Facility Name</b>  | Coveright Surfaces Canada Inc.  |  |
| <b>Facility Address</b>   | <b>Physical Address:</b>  | <b>Mailing Address:</b>                              |
|   | 56 Willmott St.<br>Cobourg, ON<br>K9A 1H4                                   | Same as physical address                             |
| <b>Number of Employees</b>  | 180   |  |
| <b>NPRI ID</b>  | 0177  |  |
| <b>Ontario MOE ID Number</b>  | ON1293800   |  |
| Facility and Planner Contact Information  |   |  |
| <b>Facility Public Contact</b>  | Tim Merkley, HSE Coordinator  | Coveright Surfaces Canada Inc.                       |
|   | Email: <a href="mailto:tim.merkley@arclin.com">tim.merkley@arclin.com</a>   | Same as facility address                             |
|   | Phone: (905) 372-1896 x279  |  |
| <b>Facility Technical Contact</b>   | Tim Merkley, HSE Coordinator  | Coveright Surfaces Canada Inc.                       |
|   | Email: <a href="mailto:tim.merkley@arclin.com">tim.merkley@arclin.com</a>   | Same as facility address                             |
|   | Phone: (905) 372-1896 x279  |  |
| <b>Facility TSRP Coordinator Contact</b>  | Tim Merkley, HSE Coordinator  | Coveright Surfaces Canada Inc.                       |
|   | Email: <a href="mailto:tim.merkley@arclin.com">tim.merkley@arclin.com</a>   | Same as facility address                             |
|   | Phone: (905) 372-1896 x279  |  |
| <b>Person who Prepared the Plan (if different from the TSRP coordinator)</b>  | Colin Welburn   | RWDI AIR Inc.  |
|   | Email: <a href="mailto:ctw@rwdi.com">ctw@rwdi.com</a>                       | 650 Woodlawn Road West<br>Guelph, Ontario<br>N1K 1B8 |
|   | Phone: (519) 823-1311 x 2325  |  |
| <b>Planner Responsible for Making Recommendations</b>   | Colin Welburn   | RWDI AIR Inc.  |
|   | Planner License No.: TSRP0049   | 650 Woodlawn Road West<br>Guelph, Ontario<br>N1K 1B8 |
|   | Email: <a href="mailto:ctw@rwdi.com">ctw@rwdi.com</a>                       |  |
|   | Phone: (519) 823-1311 x 2325  |  |
| <b>Highest Ranking Employee</b>   | Jason Farrow<br>Plant Manager<br>Phone: (905) 372-1896                      | Coveright Surfaces Canada Inc.                       |
|   | Email: <a href="mailto:Jason.Farrow@arclin.com">Jason.Farrow@arclin.com</a> | Same as facility address                             |
|   | Phone:  |  |
|   |   |  |
| <b>Planner Responsible for Certification</b>  | Colin Welburn   | RWDI AIR Inc.  |
|   | Planner License No.: TSRP0049   | 650 Woodlawn Road West<br>Guelph, Ontario<br>N1K 1B8 |
|   | Email: <a href="mailto:ctw@rwdi.com">ctw@rwdi.com</a>                       |  |
|   | Phone: (519) 823-1311 x 2325  |  |

# 1. NITROGEN OXIDES (EXPRESSED AS NITROGEN DIOXIDE) CAS NO. 11104-93-1)

## Statement of Intent

Coveright Surfaces Canada, Inc. (Coveright) intends to reduce its creation of nitrogen oxides.

## 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.

## Description of Used of Substance

Nitrogen oxides are created by Coveright through the combustion of fuel for process heat and space heat.

## Description Option(s) to be Implemented

Coveright will implement the following option(s).

- Outsource the production of resin to Arclin operations off-site. With this initiative, Coveright will no longer receive 44% formaldehyde / 0.63% methanol shipments.

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 nitrogen oxide emissions by approximately 2.6 tonnes (11%) relative to 2012 production levels 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 Nitrogen oxides and Particulate Matter, dated December 21, 2013.*

| 2. PM10 PARTICULATE MATTER <= 10 MICRONS (CAS NO. NA-M09)<br>PM2.5 PARTICULATE MATTER <= 2.5 MICRONS (CAS NO. NA-M10)   |  |
|---|--|
| <b>Statement of Intent</b>  |  |
| Coveright Surfaces Canada, Inc. (Coveright) intends to reduce its creation of particulate matter.   |  |
| <b>Objectives</b>   |  |
| 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.  |  |
| <b>Description of Used of Substance</b>   |  |
| Particulate matter is created by Coveright through the combustion of fuel for process heat and space heat. It is also generated from the cutting of particle board and total dissolved solids in water that drifts out from the cooling tower.  |  |
| <b>Description Option(s) to be Implemented</b>  |  |
| Coveright will implement the following option(s).   |  |
| <ul style="list-style-type: none"> <li>▪ Outsource the production of resin to Arclin operations off-site. With this initiative, Coveright will no longer receive 44% formaldehyde / 0.63% methanol shipments.</li> </ul>  |  |
| In addition to the outsourcing of resin production, Coveright will implement the following options to reduce the use/creation of formaldehyde:  |  |
| <ul style="list-style-type: none"> <li>▪ Increase proportion of ART product sold;</li> <li>▪ Prevent drips from paper impregnation process;</li> <li>▪ Introduce Splice tracking on paper impregnation process;</li> <li>▪ Update waste reduction program to reduce scrap production; and</li> <li>▪ Introduce scheduling process review to minimize overruns, optimize order size and optimize number of resin types.</li> </ul> |  |
| The combined effect of these options will be to reduce PM <sub>10</sub> emissions by approximately 910 kg (5%) and PM <sub>2.5</sub> emissions by approximately 870 kg (5%) relative to 2012 production levels 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 Nitrogen oxides and Particulate Matter, dated December 21, 2013.*

## Certification by Highest Ranking Employee

As of December 19, 2013, I, Jason Farrow, 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.

- Nitrogen Oxides (expressed as Nitrogen Dioxide) CAS No. 11104-93-1)
- PM<sub>10</sub> Particulate Matter <= 10 Microns (CAS No. NA-M09)
- PM<sub>2.5</sub> Particulate Matter <= 2.5 Microns (CAS No. NA-M10)



---

Jason Farrow

Plant Manager

Coveright Surfaces Canada, Inc.

## Certification by Licensed Planner

As of December 19, 2013 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.

### Substance

- Nitrogen Oxides
- Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)

### Date of Certified Plan

December 19, 2013

December 19, 2013



---

Colin Welburn, Planner License #TSRP0049

Senior Project Manager / Toxic Substance Reduction Planner

RWDI