
Toxics Reduction Plan Summary

**Particulate Matter \leq 2.5 Microns
(CAS # - NA-M10)**

Prepared for:

Atlas Roofing Corporation-Toronto Facility
55 Akron Road
Etobicoke, Ontario
M8W 1T3

Prepared by:

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November 2017

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1.0 Introduction

Atlas Roofing Corporation (Toronto facility) (hereafter "Atlas"), operates a manufacturing facility located at 55 Akron Road in Etobicoke, Ontario (the "Facility"). Atlas manufactures a wide range of high quality PolyIso foam boards for the North American market. The PolyIso boards are used on the roof or cladding in residential or commercial buildings. The main application of these boards is for a thermal barrier to reduce the heat transfer of the building to its surrounding environment.

The Facility is required to prepare plans under The Toxics Reduction Act (and O. Reg. 455/09); they have to account, report and prepare a plan on the reduction of specific toxic substances.

The facility was previously required to report and prepare plans for four (4) TRA substances:

- Polymeric Diphenylmethane Diisocyanate (PMDI) (CAS# - 9016-87-9)
- Methylenebis (phenylisocyanate) (MDI) (CAS# - 101-68-8)
- Nonylphenol and its Ethoxylates (CAS# - NA-20)
- Pentane (all isomers) (CAS# - NA-35)

As of the 2016 reporting year, the facility is required to report two additional substances: Ethylene Glycol (CAS# - 107-21-1) and particulate matter \leq 2.5 microns (PM2.5) (CAS# - NA-M10).

As per the requirements of the regulation a plan for each substance reported was prepared. This plan was developed to meet the requirements under O. Reg. 455/09 for PM2.5 (CAS#-NA-M10). A separate plan for Ethylene Glycol (CAS# - 107-21-1) was also prepared. In addition to this document, a plan summary will be submitted to the Ontario Ministry of the Environment and Climate Change (MOECC) and posted on the internet for the public to view.

1.1. *General Information*

This toxics reduction plan is for particulate matter \leq 2.5 microns (PM2.5) (CAS#: NA-M10). Atlas Roofing manufactures a wide range of high quality PolyIso foam boards for

the North American market. The PolyIso boards are used on the roof or cladding in residential or commercial buildings. The main application of these boards is for a thermal barrier to reduce the heat transfer of the building to its surrounding environment. In the manufacturing of the PolyIso boards, the Facility cuts the boards to appropriate sizes. The facility creates PM2.5 as a result of cutting and handling the boards. There is an associated baghouse that exhausts outdoors from this operation. The substance is created as a by-product.

The toxic substance is contained in this product and released to the atmosphere as a Part 4 substance (under the National Pollutant Release Inventory) through an exhaust stack.

Table 1- General Facility Information

NPRI Number	005802
O. Reg. 127/01 Number	7026
Number of Full-Time Employee Equivalents	37
NAICS Code (2 digit)	31-33 - Manufacturing
NAICS Code (4 digit)	3261 Plastic Manufacturing
NAICS Code (6 digit)	326150 Urethane & Miscellaneous Foam Products Manufacturing
UTM Coordinates	17 T 618251.12 m E 4828427.08 m N
Company Legal Name	Atlas Roofing Corporation
Company Trade Name	Atlas Roofing Corporation (Toronto plant)
Parent Company	Atlas Roofing Corporation

1.2. Plan Contacts

A list of the individuals involved in the planning process is provided below:

<p>Public Contact: Tikran Gharakhanian Plant Manager 55 Akron Road Etobicoke, ON M8W1T3 Tel: (416) 201-8975 Email: tghara@atlasroofing.com</p>
<p>Planner TRA Licence #: TSRP0223</p>

2.0 Facility 's Intent, Objectives and Targets

2.1. Use

The act requires that a Facility include a statement of intent to reduce the use of the prescribed toxic substance. If the Facility does not provide a statement of intent it must provide a reason why it does not intend or why it is not possible to reduce the use of the toxic substance. In addition to this, the Facility is required to provide a list of objectives.

Statement of intent:

The Facility does not have a statement of intent.

Reason Why the Facility Does Not Have a Statement of Intent:

The facility does not have a statement of intent since PM2.5 does not enter the facility; rather it is created as an air emission. Consequently, it is not used.

Objectives:

N/A

Quantity Target:

N/A

Target Timeline:

N/A

Reason Why Toxic Substance is Used at the Facility:

N/A

2.2. Creation

The act requires that a Facility include a statement of intent to reduce the creation of the prescribed toxic substance. If the Facility does not provide a statement of intent it must provide a reason why it does not intend or why it is not possible to reduce the creation of the toxic substance.

Statement of Intent:

The Facility does not have a statement of intent.

Reason Why the Facility Does Not Have a Statement of Intent:

Atlas Roofing does not intend to further reduce the creation of PM2.5 because there are no further reduction options feasible at this time. However, the facility intends to continue to monitor potential reduction options for the future.

Objectives:

Although Atlas Roofing does not intend to further reduce the creation of PM2.5 at present, they will continue to conduct further research to explore other options on how to reduce the creation of PM2.5.

Quantity Target:

No target

Target Timeline:

No timeline

Reason Why Toxic Substance is Created at the Facility:

As a by-product.

3.0 Facility Goals

There are no reasonable substitutions for this toxic substance and many of the reduction options possible have already been implemented in the past. Therefore, there is no implementation plan or timetable.

4.0 Facility TRA Plan (info)

This plan summary is accurate, up to date and reflects the current facility version of the Toxic Reduction Plan.

5.0 Signed Certification Statements

Refer to the attached signed certification on the following page.

Certification by Highest-Ranking Employee:

As of November 8th, 2017 [date], I, Tikran Gharakhanian, 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 the plan complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

Particulate Matter \leq 2.5 microns

Signed:

A handwritten signature in black ink, appearing to read 'Tikran' followed by a stylized flourish.

Tikran Gharakhanian

Atlas Roofing Corporation-Toronto Facility

Certification by Toxic Substance Reduction Planner:

As of November 8th, 2017, I, Franco DiGiovanni, certify that I am familiar with the processes at Atlas Roofing Corporation (Toronto facility) 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 November 8th, 2017, and, that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Particulate Matter \leq 2.5 microns

Signed:



Franco DiGiovanni
Airzone One Ltd.