
Toxics Reduction Plan Summary

Phosphorus (total)
CAS#: NA - 22

Prepared for:

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

Prepared by:

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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 board 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 six (6) 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)
- Ethylene Glycol (CAS# - 107-21-1)
- Particulate matter \leq 2.5 microns (PM2.5) (CAS# - NA - M10)

As of the 2017 reporting year, the facility is required to report one additional substance: Phosphorus (total) (CAS# - NA - 22).

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 Phosphorus (total) (CAS# - NA - 22).

1.1. General Information

This toxics reduction plan is for Phosphorus (total) (CAS# - NA - 22). Atlas manufactures a wide range of high quality PolyIso foam board 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 utilizes a high efficiency flame retardant to prevent fires from starting or to slow the spread of fire in the PolyIso boards. The flame retardant that is used at the facility is called Quench TCPP (manufactured by Ulterion), a halogen-phosphate based flame retardant that contains Phosphorus, a TRA Part 1a substance. TCPP is an essential part of the raw material used at Atlas in order to meet the PolyIso Foam flame retardant classifications and specifications.

The toxic substance is contained in this product and is not released to the atmosphere.

Table 1- General Facility Information

NPRI Number	005802
O. Reg. 127/01 Number	7026
Number of Full-Time Employee Equivalents	41
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 M8W 1T3 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 uses a flame retardant in the manufacturing of PolyIso foam boards. The flame retardant contains phosphorus. Currently, there is no suitable substitute that could provide similar results. Atlas Roofing Corporation does not intend to reduce phosphorus because (i) presently there are no further reduction options possible, (ii) the

use of a flame retardant is essential for the product manufacturing, and, (iii) it is not technically or economically feasible to reduce it. Atlas Roofing will continue to use this substance in strict accordance with all applicable environmental regulations, and will continue to evaluate opportunities to reduce the use of the toxic substance as an ongoing project.

Objectives:

The Facility has an Environmental Management Plan, which includes procedures for spill handling, leak detection, and pollution prevention. Also, the Facility is implementing the Lean Manufacturing Principles into its operation, and managing the level of raw material inventory to reduce leaks and spills from its facility. The Facility intends to continue to ensure that flame retardant is used in a responsible and efficient manner. All employees at the Facility will be involved in the reduction plan of toxic substance usage. Toxic substances will be the first priority for reduction. The Facility's goal will be to reduce the usage and release of toxic substances wherever technically and economically feasible.

Quantity Target:

No target.

Target Timeline:

No timeline.

Reason Why Toxic Substance is Used at the Facility:

For on-site use/ processing.

2.2. *Creation*

The act requires that a facility include a statement of intent to reduce the creation of the prescribed toxic substance. If a 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:

The Facility does not create the subject substance at the Facility; therefore it is not required to provide a statement of intent on the creation of this substance.

Objectives:

Not applicable.

Quantity Target:

Not applicable.

Target Timeline:

Not applicable.

Reason Why Toxic Substance is Created at the Facility:

Not applicable.

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 October 19th, 2018 [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.

PHOSPHORUS

Signed:

Tikran  10/19/2018

Tikran Gharakhanian

Atlas Roofing Corporation-Toronto Facility

Certification by Toxic Substance Reduction Planner:

As of October 19, 2018, 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 October 19, 2018, and, that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

PHOSPHORUS

Signed:



Franco DiGiovanni
Airzone One Ltd.