
Toxics Reduction Plan

Ethanol
CAS: 64-17-5

Prepared for:
Ros-Mar Litho O/A PaperWorks Packaging
65 Cascade Street,
Hamilton, Ontario
L8E 3B7

Prepared by:
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1.0 Introduction

Ros-Mar Litho O/A PaperWorks Packaging Group (PPG) operates a manufacturing facility located at 65 Cascade Street in Hamilton, Ontario (the "Facility"). PPG manufactures printed paperboard folding boxes and containers, generally utilized by the consumer packaging market.

The Facility is required to prepare plans under The Toxics Reduction Act (and O. Reg 455/09); they have to account, report and prepare plans on the reduction of specific toxic substances. The Facility has prepared plans for two (2) TRA Phase I substances: Methanol (CAS#: 67-56-1) and Toluene (CAS#: 108-88-3). The Facility has prepared plans for three (3) TRA Phase II substances: Isopropanol (CAS#: 67-63-0), Stoddard Solvent (CAS#: 8052-41-3), and 2-Butoxyethanol (CAS#: 111-76-2). The Facility is required to report one additional TRA Phase II substance: Ethanol, which was reportable for the first time in 2013. This plan was developed to meet the requirements under O. Reg. 455/09 for Ethanol (CAS#: 64-17-5).

1.1. *General Information*

This toxics reduction plan is for Ethanol (CAS#: 64-17-5). The facility utilizes an industrial solvent (T4278 Special Wash) to clean the printing presses and printing plates prior to the usage in the next printing job. The toxic substance is contained in this product and released to the atmosphere as a part 4 substance (Total VOCs) through the printing presses exhaust stacks and as such is expected to be 100% emitted.

Table 1- General Facility Information

NPRI Number	11795
O Reg 127/01 Number	N/A
Number of Full-Time Employee Equivalents	159
NAICS Code (2 digit)	31-33 - Manufacturing
NAICS Code (4 digit)	3231 - Printing and Related Support Activities
NAICS Code (6 digit)	323119 - Other Printing
UTM Coordinates	17 T 601117 m E 4788210 m N
Company Legal Name	PaperWorks Packaging Group
Company Trade Name	PaperWorks Packaging Group

1.2. Plan Contacts

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

Public Contact:

Shannon Robertson
 EHS Manager
 Tel: (905) 573-4669
 Email: shannon.robertson@paperwrks.com

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:

PaperWorks Packaging Group does not intend to reduce ethanol because (i) there are no further reduction options possible, and, (ii) they are in the printing business, where the use of the special wash is essential for the cleaning operation of the printing presses. There is no suitable substitute cleaning formulation that could provide similar results that are within the customers' demands.

Objectives:

PaperWorks Packaging Group does not intend to reduce the use of special wash (ethanol); however, they will continue to conduct further research to identify new reduction options and to keep up with industry standards with regards to ethanol pollution prevention.

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 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:

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 Used 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 05 : 22 : 2015. [date], I, Roy Amm, 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, with the exception of the regulatory deadline, and the plan complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act. The plan was submitted after the December 31st deadline due to staff restructuring.

ETHANOL

Signed:



Roy Amm

PaperWorks Packaging Group

Certification by Toxic Substance Reduction Planner:

As of May 21, 2015, I, Franco DiGiovanni, certify that I am familiar with the processes at PaperWorks Packaging Group 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 May 21, 2015, and, with the exception of the regulatory deadline, that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

ETHANOL

Signed:

A handwritten signature in black ink, appearing to read 'DiGiovanni', written in a cursive style.

Franco DiGiovanni

Airzone One Ltd.