

Appendix C

TRA Plan Summary – Bis(2-ethylhexyl)
phthalate

Basic Facility Information		
Name & CAS # of Substance	Bis(2-ethylhexyl) phthalate	117-81-7
Substances for which other Plans have been prepared	Aluminum	1334-28-1

Facility Identification and Site Address	
Company Name	AirBoss of America Corporation
Facility Name	Rubber Compounding Division
Facility Address	101 Glasgow Street Kitchener, Ontario N2G 4X8
Spatial Coordination of Facility (UTM Coordinates)	
Number of Employees	243
NPRI ID	7004
9-digit business number	
Parent Company (PC) Information	
PC Name	AirBoss of America Corporation
PC Address	16441 Yonge Street Newmarket, Ontario L3X 2G8
Percent Ownership for PC	100%
Primary North American Industrial Classification System Code (NAICS)	
2 Digit NAICS Code	32 – Manufacturing
4 Digit NAICS Code	3262 - Rubber Product Manufacturing
6 Digit NAICS Code	326290 - Other Rubber Product Manufacturing
Company Contact Information	
Facility Public Contact	Theresa Sonder, EHS Manager
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	Fax: (519) 576-1315
Facility Technical Contact	Theresa Sonder, EHS Manager
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Toxic Reduction Policy Statement of Intent

The AirBoss of America Corporation (AirBoss) Rubber Compounding Division (Facility) is currently using Bis(2-ethylhexyl) phthalate in three liquid products, including an antioxidant material and two oil materials.

After consideration of all reduction options it has been determined that the Facility is not currently capable of reducing the use of Bis(2-ethylhexyl) phthalate as it is an essential additive material for the manufacturing of rubber products. AirBoss does not create Bis(2-ethylhexyl) phthalate; therefore this plan will not address reducing its creation.

Reduction Objectives

AirBoss was unable to identify any reduction options; therefore, there is no reduction objective in this plan.

Description of Facility

The AirBoss Facility is a rubber product manufacturing facility. Rubber mixes at Airboss differ depending upon the desired characteristics of the product being manufactured. The rubber product manufacturing process begins with the production of a rubber mix from polymers (raw and/or synthetic rubber), carbon black (the primary filler used in making a rubber mixture), oils, and miscellaneous chemicals. The miscellaneous chemicals include processing aids, activators, accelerators, age resisters, fillers, softeners, and specialty materials.

The main processes at the facility which will be discussed in further detail throughout the report begins with receiving the raw materials such as natural rubber, synthetic rubber, carbon black, oils, and other miscellaneous chemicals. The received materials are handled and stored prior to being loaded into one of the five Banbury mixers. The mixed rubber is then discharged to a mill, which forms it into a long strip or sheet. Some of the rubber may then go to the cold fed extruder, which transforms the rubber into various shapes or profiles by forcing it through dies via a rotating screw. The rubber products are then allowed to cool before being stored until ready to be shipped off site to the customers. The Facility's North American Industrial Classification Service (NAICS) Code is 326290 - "Other Rubber Product Manufacturing".

Toxic Substance Reduction Options

After looking into the seven categories of toxic substance reduction options, no options were identified. Explanations are provided in the table below to detail why an option could not be identified in each category.

Toxic Substance Reduction Category	Option: Identification and Description
1) Materials or feedstock substitution	No option identified: AirBoss is required to order specific products to meet their client specifications. The facility utilizes the necessary raw materials on a per batch basis to manufacture rubber products containing the required properties prior to shipping the final products off to the customers. AirBoss does not have the ability to change the feedstock material or its composition because it is essential in the manufacturing of rubber products being purchased from the Facility. Therefore, no possible reduction options for material or feedstock substitutions were identified.
2) Product design or reformulation	No option identified: Bis(2-ethylhexyl) phthalate is a constituent ingredients in products that are used for the manufacturing of certain rubber products. These rubber products are manufactured according to customer specifications and these products are used in specific quantities to provide certain required properties to the rubber products. The necessary properties of the rubber products are specified by the customers and AirBoss does not have the ability to redesign the finished products. No further changes to the product design or reformulation is possible under the current conditions at the Facility.
3) Equipment or Process Modification	No option identified: AirBoss currently uses industry standard equipment for the various processes associated with the use of B2P. At this time, there are no potential equipment replacements or process modifications that would provide a potential reduction in the amount of toxic substances used at the facility.
4) Spill and Leak prevention	No option identified: AirBoss conducts regular preventive maintenance on all equipment to ensure it is operating efficiently. AirBoss has a documented procedure to limit spills of raw materials in the spill control and prevention plan. Additionally, all liquid products containing Bis(2-ethylhexyl) phthalate are received by truck and emptied directly into the storage tanks which are equipped with spill containment trenches. The products are added to the manufacturing process in a controlled manner which limits the potential of any spills.

Toxic Substance Reduction Category	Option: Identification and Description
	It has been determined that no further measures can be taken to prevent any spills or leaks at the Facility. Therefore, no possible reduction options for spill and leak prevention were identified.
5) On-site reuse or recycling	No option identified: AirBoss creates waste rubber when the products are shaped to sizes specified by the customers. AirBoss reuses excess rubber that is a by-product from the operations to be used for rubber products whenever possible. Due to the specifications given by the customers AirBoss is forced to produce waste rubber and so there are no options available to AirBoss to limit their quantity of waste rubber. Therefore, no possible reduction options for on-site reuse and recycling were identified.
6) Improve inventory management or purchasing techniques	No option identified: The raw materials arrive on site as required based on physical inventory. The amount purchased is based on the actual consumption and estimated demand. The products containing Bis(2-ethylhexyl) phthalate are received by truck and stored in a sealed tank. The products are transferred to the production area as required by the batch recipe. Any modification to the purchasing techniques would only affect the time that the products are received and would not affect the required amount used at the facility. The Facility is unable to identify a reduction option related to improved inventory management or purchasing techniques as they are already doing everything possible in this category.
7) Training or improved operating practices	No option identified The staff is trained to inspect and monitor process operations to ensure all process equipment is operating properly. Additionally, training is given to the employees to take all the necessary precautions when using process equipment and materials. Equipment maintenance programs and training on Standard Operating Procedures (SOPs) are in place to ensure efficient operating practices. The continuous improvement policy of the company includes operating practices based on their related standard operating procedures. There is no potential for the implementation of further training for the floor workers that would result in improved operational efficiency.

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for the use of Bis(2-ethylhexyl) phthalate

Certification by Highest Ranking Employee

Attached.

Certification by Licensed Planner

Attached.



8. Plan Certifications

Certification By Highest Ranking Employee

As of December 20, 2016, I, Robert Dodd, 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 complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

Aluminum

Bis(2-ethylhexyl) phthalate

Robert Dodd, President
AirBoss of America Corporation

DEC 20th, 2016.

Date

Certification By Licensed Planner

As of December 20, 2016, I, Erik Martinez, certify that I am familiar with the processes at AirBoss 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 December 2016 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Aluminum

Bis(2-ethylhexyl) phthalate

Erik Martinez, P.Eng.
Planner License # TSRP0005
GHD

December 20, 2016

Date