

Toxic Reduction Plan Summary

Substance

Substance Name and CAS #	Lead and CAS # NA-08
Substances for which other plans have been prepared	Zinc
Beneficial Uses at Facility	prevents moisture penetration; activator
Reasons for Use	As a formulation component
Reasons for use - summary statement	Lead is used as a formulation component in the manufacture of specific rubber products to prevent moisture penetration; it may also act as an activator.
Reasons for Creation	This substance is not created at the facility
Reasons for creation - summary statement	N/A

Facility Information

Company Name	AirBoss Rubber Compounding
Facility Name	Rubber Compounding Division
Facility Physical Address	101 Glasgow Street, Kitchener, ON, Canada, N2G 4X8
Facility Mailing Address	Same as physical address
Spatial Coordinates of Facility	539612 Easting; 4811057 Northing
Number of Employees	350
NPRI ID	7004
Ontario MOE (R.127)ID Number	none assigned
2 Digit NAICS Code	31-33
4 Digit NAICS Code	3262
6 Digit NAICS Code	326290

Parent Company Information

Parent Company Name	Airboss of America Corporation
Address	16441 Yonge Street, Newmarket, ON, CANADA, L3Y 4V8
Percent Ownership (if available)	100%

Facility Contact

Public Contact	Richard Kauk
Position	EHS Manager
Address	101 Glasgow Street, Kitchener, ON, Canada, N2G 4X8
email	rkauk@airboss.ca
Phone	519-576-5565 x3062
Fax	519-576-1315

Date of Plan: **November 27, 2012**

Statement of Intent

AirBoss Rubber Compounding - Rubber Compounding Division is committed to playing a leadership role in protecting the environment. Whenever feasible, we will eliminate, or reduce the use, creation and discharge of lead in full compliance with all Federal and Provincial Regulations.

Plan Objectives

Our goal is to eliminate the use of lead at our facility.

Description of Substance (Reason for Use and/or Creation)

Lead is used as a formulation component in the manufacture of specific rubber products to prevent moisture penetration; it may also act as an activator.

Description of Previously Implemented Reduction Opportunities:

- 100% on site reuse/recycle and material never expires therefore stored for future use if required
- products that contain lead have no regrind products added to them to ensure all scrap can be re-used (regrind products may contain metal ie steel bands from tires etc)
- ISO 9001 & 14001, OHSAS 18001 certifications audited by 3rd party to ensure compliance and continuous improvement - prevention plans in place and implemented

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for lead, prepared by AirBoss Rubber Compounding - Rubber Compounding Division, dated November 27, 2012.

Toxic Substance Reduction Option(s) to be Implemented

The following options have been identified for implementation to reduce the use, creation, or releases of lead:

		Used	Created	Contained in Product	On-Site Releases to Air	On-Site Releases to Water	On-Site Releases to Land	Disposal On-Site	Disposal Off-Site	Transfer Off-Site for Recycling
Option Description:	Reformulate to replace with resin depending on purpose of lead in product.									
Estimated Reductions due to Option Implementation	kilograms	626.6622	N/A	456.9616	0.0218	N/A	N/A	N/A	0.4414	N/A
	%	100.00%	N/A	100.00%	100.00%	N/A	N/A	N/A	100.00%	N/A
Timeline for Reductions	Years	1	N/A							
Option Description:	Improve nmq (new material quotes) and experimentals (R&D) procedures to ensure full evaluation prior to any materials being brought on site.									
Estimated Reductions due to Option Implementation	kilograms	0.0000	N/A	0.0000	0.0000	N/A	N/A	N/A	0.4414	N/A
	%	0.00%	N/A	0.00%	0.00%	N/A	N/A	N/A	100.00%	N/A
Timeline for Reductions	Years	1	N/A							

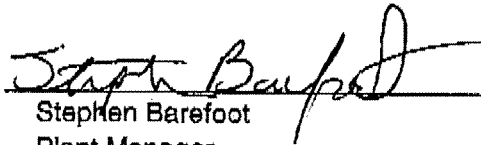
Toxic Reduction Plan Summary, Continued

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Certification By Highest Ranking Employee

As of November 27, 2012, I, Stephen Barefoot, 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.

Toxic Substance: **Lead**



Stephen Barefoot

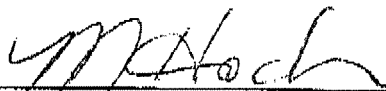
Plant Manager

AirBoss Rubber Compounding - Rubber Compounding Division

Certification By Licensed Planner

As of November 27, 2012, I, Melanie Hockin certify that I am familiar with the processes at AirBoss Rubber Compounding - Rubber Compounding Division that use or create the toxic substance, 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 27, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substance: **Lead**



Melanie Hockin

Toxic Substance Reduction Planner

License Number: TSRP0140

LEHDER Environmental Services Limited

Toxic Reduction Plan Summary

Substance

Substance Name and CAS #	Zinc and CAS # NA-14
Substances for which other plans have been prepared	Lead
Beneficial Uses at Facility	activator required in 98% of all products; minor lubricating properties
Reasons for Use	As a formulation component
Reasons for use - summary statement (mandatory)	Zinc is used as a formulation component in the manufacture of rubber products because it is an effective activator required in the process; it also provides minor lubricating properties which are beneficial to the process.
Reasons for Creation	This substance is not created at the facility
Reasons for creation - summary statement (mandatory)	N/A

Facility Information

Company Name	AirBoss Rubber Compounding
Facility Name	Rubber Compounding Division
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Statement of Intent

AirBoss Rubber Compounding - Rubber Compounding Division is committed to playing a leadership role in protecting the environment. Whenever feasible, we will eliminate, or reduce the use, creation and discharge of zinc in full compliance with all Federal and Provincial Regulations.

Plan Objectives

Our goal is to reduce zinc used at our facility by further minimizing the potential for spills, reducing zinc containing waste generation, and by controlling materials used for experimental purposes.

Description of Substance (Reason for Use and/or Creation)

Zinc is used as a formulation component in the manufacture of rubber products because it is an effective activator required in the process; it also provides minor lubricating properties which are beneficial to the process.

Description of Previously Implemented Reduction Opportunities:

- substituted calcium stearate for zinc stearate in slab dip anti sticking agent
- reduced incoming zinc to utilize only the minimum concentration required to achieve desired properties in product
- on site re-use of collected dust and scrap product by feeding small quantities back into batch until used up - only contaminated dust/scrap sent off site
- procedures to prevent spills/wastes by requiring shippers to inspect bags to ensure they are in good condition prior to receiving them on site
- spill response team trained to prevent and minimize losses during a spill/leak
- ISO 9001 & 14001, OHSAS 18001 certifications audited by 3rd party to ensure compliance and continuous improvement - prevention plans in place and implemented

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for zinc, prepared by AirBoss Rubber Compounding - Rubber Compounding Division, dated November 27, 2012.

Date of Plan: **November 27, 2012**

Toxic Substance Reduction Option(s) to be Implemented

The following options have been identified for implementation to reduce the use, creation, or releases of zinc:

		Used	Created	Contained in Product	On-Site Releases to Air	On-Site Releases to Water	On-Site Releases to Land	Disposal On-Site	Disposal Off-Site	Transfer Off-Site for Recycling
Option Description:	Improve inspection procedures to prevent losses of material during receiving/transportation (Super Sacs & Storage).									
Estimated Reductions due to Option Implementation	Tonnes	10.9187	N/A	0.0000	0.0000	N/A	N/A	N/A	0.0000	N/A
	%	1.50%	N/A	0.00%	0.00%	N/A	N/A	N/A	0.00%	N/A
Timeline for Reductions	Years	1	N/A							
Option Description:	Improve nmq (new material quotes) and experimentals (R&D) procedures to ensure full evaluation prior to any materials being brought on site.									
Estimated Reductions due to Option Implementation	Tonnes	not quantifiable	N/A	0.0000	0.0000	N/A	N/A	N/A	0.0000	N/A
	%	not quantifiable	N/A	0.00%	0.00%	N/A	N/A	N/A	0.00%	N/A
Timeline for Reductions	Years	1	N/A							
Option Description:	Visual work instructions for all environmental procedures to improve operating practices.									
Estimated Reductions due to Option Implementation	Tonnes	not quantifiable	N/A	0.0000	0.0000	N/A	N/A	N/A	0.0000	N/A
	%	not quantifiable	N/A	0.00%	0.00%	N/A	N/A	N/A	0.00%	N/A
Timeline for Reductions	Years	1	N/A							

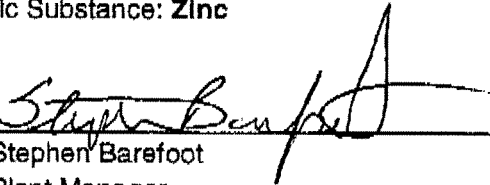
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Toxic Substance: **Zinc**



Stephen Barefoot

Plant Manager

AirBoss Rubber Compounding - Rubber Compounding Division

Certification by Licensed Planner

As of November 27, 2012, I, Melanie Hockin certify that I am familiar with the processes at AirBoss Rubber Compounding - Rubber Compounding Division 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 27, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substance: **Zinc**



Melanie Hockin

Toxic Substance Reduction Planner

License Number: TSRP0140

LEHDER Environmental Services Limited