



REGULATORY COMPLIANCE CONSULTING

Baytech Plastics Inc.
Heritage Plant
#16403 Highway 12, Midland, Ontario L4R 4L6

Toxics Reduction Act
2019 Public Report
covering
Toxic Substance Reduction Plans for
Methyl Ethyl Ketone & Butyl Acetate
(dated Dec. 29th, 2014, confirmed Mar. 31st, 2015)
Toxic Substance Reduction Plans for
Ethyl Alcohol & Acetone
(dated July 13th, 2015, confirmed July 21st, 2015)
Xylene
(dated Dec. 18th, 2017, certified Dec. 19th, 2017)

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HERITAGE PLANT
#16403 Highway 12, Midland, Ontario L4R 4L6

Toxics Reduction Act
2019 Public Report
Methyl Ethyl Ketone & Acetone
Butyl Acetate & Ethyl Alcohol
Xylene

Toxics Reduction Act & Ontario Regulation 455/09

For: Michael Dutton
Director, Heritage Operations
Baytech Plastics Inc.

July 18th, 2020

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CANADA

Toxics Reduction Act – 2019 Public Report

Methyl Ethyl Ketone, Butyl Acetate, Ethyl Alcohol, Acetone & Xylene Toxics Reduction Act and Ontario Regulation 455/09

Description of Facility

Baytech Plastics Inc. (Baytech) produces various plastic products for commercial and home use. The main facility activities include manufacturing, assembly, shipping, receiving, and warehousing. The facility operates 24 hours per day, seven days per week and no incidents out of the normal course of events occurred at the facility during 2019. TRA Substances include Methyl Ethyl Ketone (MEK), Butyl Acetate, Ethyl Alcohol, Xylene and Acetone. MEK, Butyl Acetate, Ethyl Alcohol and Xylene are present in the manufacturing process, are TRA substances and National Pollutant Release Inventory (NPRI) Part 5 Speciated Volatile Organic Compounds (VOC). They are released in excess of 1 tonne, the set threshold, and make significant contribution to the total emission of NPRI Part 4 group of substances; VOC's. Acetone is also present in the manufacturing process, is a TRA substance and an Ontario Ministry of Environment Airborne Contaminant Discharge Table 2B substance when released in excess of 3,000 kilograms but is not considered a VOC. A Toxic Substance Reduction Plan (dated Dec. 29th, 2014 and confirmed Mar. 31st, 2015) for MEK and Acetone was made using 2012 data as these two substances qualified as NPRI and TRA reportable substances that year. Butyl Acetate and Ethyl Alcohol were both first qualified from 2013 data and a Toxic Substance Reduction Plan (dated July 13th, 2015 and confirmed July 21st, 2015) was made for those substances. Xylene exceeded the one-tonne NPRI Part 5 threshold for the first time in 2016 and also has a TSRP (dated Dec. 18th, 2017). This Public Report covers all five substances for 2018 and voluntarily reports this information for Ethyl Alcohol as it was found to be used and released in a quantity under below threshold.

Baytech is committed to environmental sustainability. More information is available at <http://www.baytechplastics.com/environmental>, and <http://www.baytechplastics.com/green-initiatives>.

Facility Name: Baytech Plastics Inc.

Location: #16403 Highway 12, Midland, Ontario L4R 4L6

Phone Number: (705) 526-0591

Fax Number: (705) 526-1560

NPRI Identification Number: 2966

MOE I.D. Number: 5666

2-Digit NAICS Code: 32 4-Digit NAICS Code: 3261

6-Digit NAICS Code: 326198 – All Other Plastic Product Manufacturing

Number of Full-time Employees: ~ 110

UTM Spatial Coordinates: (NAD83-Zone17) 590778 mE: 4954391 mN (front entrance)

Substance 1: Methyl Ethyl Ketone (MEK) CAS Number: 78-93-3 (NPRI Part 5)

Substance 2: Acetone CAS Number: 67-64-1 (ACD Table 2B)

Substance 3: Butyl Acetate CAS Number 123-86-4 (NPRI Part 5)

Substance 4: Ethyl Alcohol CAS Number 64-17-5 (NPRI Part 5)

Substance 5: Xylene CAS Number 1330-20-7 (NPRI Part 5)

Public Contact

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Methyl Ethyl Ketone, Butyl Acetate, Ethyl Alcohol and Xylene are released to air as VOC's from their use as a thinner (MEK) and a component in coatings during mixing and painting (others). Acetone is released to air as a VOC from it being used as a cleaner for paint equipment and in a very minor amount from one coating during mixing, painting and drying.

Methyl Ethyl Ketone (MEK) (CAS# 78-93-3)

[MEK] Release to Air from facility process (mixing, painting and drying)

- has straight forward quantifications and direct and indirect cost estimates
- NPRI Part 5 threshold met (>1,000 kg as individual VOC)
- qualified as a Speciated VOC in 2012

Butyl Acetate (CAS# - 123-86-4)

Butyl Acetate Release to Air from facility process (mixing, painting and drying)

- has straight forward quantifications and direct and indirect cost estimates
- NPRI Part 5 threshold met (>1,000 kg as individual VOC)
- qualified as a Speciated VOC in 2013

Ethyl Alcohol (CAS# - 64-17-5)

Ethyl Alcohol Release to Air from facility process (mixing, painting and drying)

- has straight forward quantifications and direct and indirect cost estimates
- does not qualify for 2016; NPRI Part 5 threshold unmet (>1,000 kg as individual VOC), qualified as a Speciated VOC in 2013

Xylene (CAS# - 1330-20-7)

Xylene Release to Air from facility processes (mixing, painting and drying)

- has straight forward quantifications and direct and indirect cost estimates
- NPRI Part 5 threshold met (>1,000 kg as individual VOC)
- qualified as a Speciated VOC in 2016

Acetone (CAS# - 67-64-1)

[Acetone] Release to Air from facility process (mixing, painting and drying)

- has straight forward quantifications and direct and indirect cost estimates
- ACD Table 2B threshold met (>3,000 kg)
- qualified as an ACD Table 2B substance in 2013

Statement of Intent

After careful and due consideration of its operations and with ongoing commitment to its environmental sustainability policy, Baytech does not intend to reduce the use and release of the toxic substances at this time.

Objective of the Plan

As options available for reduction are dependent on customer requirements which do not allow for the use of alternatives in coatings, thinner or cleaner, no objective for substance reduction will be made under these plans for MEK, Butyl Acetate, Ethyl Alcohol or Acetone.

Target & Timeline

Baytech is able to reduce the use of the Acetone as a cleaner, but this would not reduce Acetone to a level below the reporting threshold and would not reduce the overall use of NPRI Part 5 speciated VOC's. Baytech is not able to reduce the use of Methyl Ethyl Ketone (MEK) as a thinner, nor is it able to reduce the use of Acetone, MEK, Butyl Acetate and/or Ethyl Alcohol as components in coatings and therefore has no targets or timelines for the Plans.

Substance Use

Baytech produces plastic products, most of which are coated with primers, additives and paints.

TRA prescribed toxic substances MEK, Butyl Acetate, Ethyl Alcohol, Xylene and Acetone are received at the facility in liquid form in metal containers (5 litre pails and 205 litre drums).

Primers and paints are mixed with a thinner (MEK) to prepare coatings for spray painting plastic parts (painting process).

Acetone is used as a cleaner for painting equipment. All substances are also present as components in coatings. MEK, Butyl Acetate, Ethyl Alcohol, Xylene and Acetone, being volatile substances, escape as air emissions during mixing, painting and drying of parts.

There are no other creations (C), Destruction (D), Transformation (T), releases (L, W), disposal (DIS), offsite transfers (TR) of TRA substances or any substance contained in product (P).

TRA Summary Table

Baytech Plastics Inc. - Heritage Plant - TRA Substance Accounting Public Report 2019

Substance	CAS #	Year	Used	change % & qty.	Created	change % & qty.	Released	change % & qty.	Disposed	Recycled	Contained in Product
Methyl Ethyl Ketone	78-93-3	2019	1-10	4%	-	-	1-10	4%	-	-	-
		2018	1-10	0.329	-	-	1-10	0.329	-	-	-
Butyl Acetate	123-86-4	2019	1-10	2%	-	-	1-10	2%	-	-	-
		2018	1-10	0.051	-	-	1-10	0.051	-	-	-
Ethyl Alcohol	64-17-5	2019	1-10	51%	-	-	1-10	51%	-	-	-
		2018	1-10	0.379	-	-	1-10	0.379	-	-	-
Xylene	1330-20-7	2019	1-10	2%	-	-	1-10	2%	-	-	-
		2018	1-10	0.035	-	-	1-10	0.035	-	-	-
Acetone	67-64-1	2019	10 - 100	8%	-	-	10 - 100	8%	-	-	-
		2018	10 - 100	0.767	-	-	10 - 100	0.767	-	-	-

Units - Tonnes.

The Plan objectives, targets and timelines have not been affected in the reporting year as there were no reduction options for implementation. There was no change in the method or combination of methods used to track and quantify the toxic substances during the previous calendar year. There were no incidents out of the normal course of events, nor were there any significant process changes at the facility during the previous calendar year.

These Toxic Substance Reduction Plan Summaries accurately reflect the Plans they summarize.


Certification for Toxics Reduction Act 2019 Public Report

TOXICS REDUCTION ACT – 2019 PUBLIC REPORT

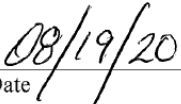
BAYTECH PLASTICS INC. – MIDLAND, ONTARIO

As of July 31st, 2020, I, Michael Dutton certify that I have read the toxics reduction act 2019 public report, dated July 18th, 2020 for the toxic substances referred to below and am familiar with its contents, and to my knowledge the report is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

[Methyl Ethyl Ketone, Butyl Acetate, Ethyl Alcohol, Xylene, Acetone]



Michael Dutton
Director – Heritage Operations, Baytech Plastics Inc.
(Highest Ranking Employee)



Date