



May 26, 2017

Polycorp Ltd. is a Canadian Company that specializes in the design and manufacture engineered elastomeric products that provide cost effective solutions to corrosion, abrasion, impact, noise and vibrations problems for a broad range of customers in the transportation, mining and protective linings sectors.

In 2009, the Government of Ontario passed legislation known as the Toxics Reduction Act, 2009. The purpose of this legislation was to prevent pollution and protect human health and the environment by reducing the use and creation of toxic substances.

Polycorp Ltd. committed to protecting the environment. Consistent with our ongoing commitment to meeting the regulatory requirements of Ontario's Toxics Reduction Act, attached is a summary of our reduction plan and 2016 report.

A handwritten signature in black ink, appearing to read 'Haber'.

Andrew Haber  
Vice President & General Manager  
Polycorp Ltd.

## Appendix C: Plan Summary

### Basic Facility Information

The following table is adapted from Appendix 3 of the MOE Planning Toolkit and provides the applicable Basic Facility Information stipulated in section 18(2) of O.Reg 455/09.

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	Zinc CAS #: *No single CAS number* Zink Oxide CAS #: 1314-13-2
NPRI Identification numbers	NPRI ID: 004181
The legal and trade names of the owner and the operator of the facility, the street address of the facility, and the mailing address of the facility, if different.	Mr. Peter Snucins Owner, President and CEO Polycorp Ltd. 33 York Street West Elora, Ontario N0B 1S0
Spatial coordinates for the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83)	43.68357N, -80.43067E
The number of full time employee equivalents at the facility	One hundred fifty five (155)
The two – and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	32 – Manufacturing 3262 – Molding, extruding, and lathe-cutting rubber to manufacture rubber goods 326299- All Other Rubber Product Manufacturing –
Public Contact	Mr. Andrew Haber Vice President & General Manager Polycorp Ltd. 519-846-2075
Technical contact and person who is responsible for coordinating plan preparation	Duane Sharer, Health & Safety, Environmental and JIT Coordinator Phone #: 519-846-2075x307 dsharer@poly-corp.com
The person who prepared the plan	Ivana Strgacic, P. Eng., MSc License Number TSRP0194 President, Strategies for the Environment Inc. 416-789-3713
Highest ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for making certification	Mr. Andrew Haber Vice President & General Manager Polycorp Ltd. 519-846-2075

## **List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility**

The Facility has prepared Toxic Substance Reduction Plan for the following prescribed Toxic Substance:

- Zinc\* (and its compounds)

\* = No single CAS number applies to these substances as per O. Reg. 455/09

### **Statement of Intent**

Polycorp is committed to protecting the environment. Wherever feasible, we will eliminate the discharge of zinc in full compliance with all federal and provincial regulations. Our employees are encouraged to participate in all types of reduction activities. The toxic substance associated with Polycorp operations is primary ingredient in our rubber compounds. Reducing the discharge and disposal of this toxic substance will be an ongoing effort at Polycorp, in addition to being environmentally responsible it also indicates improved efficiencies in our processing operations.

Options that are both technologically and economically viable will be implemented at our facility.

### **Objectives of the Plan**

The objectives of this Plan are as follows:

- Provide support for the Facility's position with respect to the Statement of Intent of this Plan; and
- Document how, by preparing this Plan, the Facility has fulfilled the applicable requirements under the TRA and O.Reg. 455/09 with respect to the Toxic Substance.

### **Description of Why the Toxic Substance Is Used:**

Zinc is utilized as an accelerator of vulcanizing process (Zinc Oxide) of raw rubber compounds Polycorp use as raw materials for the manufacturing of the products. Raw rubber compounds are purchased from various outside vendors, which made the compounds on the Polycorp prescribed specifications.

### **Statement that the Plan Summary Accurately Reflects the Plan**

The planned summary accurately reflects Polycorp Ltd. Toxic Substance Reduction Plan for Zinc

### **Planner License Number**

TSRP0194

### **Certification**

The toxic substance plan for Zinc was reviewed and certified by a licensed planner on October 22, 2014.



**TOXIC SUBSTANCE REDUCTION PLANNER LICENCE /  
LICENCE DE PLANIFICATEUR DE LA RÉDUCTION DES  
SUBSTANCES TOXIQUES**

**Ivana Strgacic**

has met the requirements under Ontario Regulation 455/09 made under the Toxic Substances Act, 2009 for the Toxic  
Substance Reduction Planner Licence. Il a satisfait aux exigences relatives à la licence de planificateur de la réduction des  
des substances toxiques du Règlement de l'Ontario 455/09 pris en application de la Loi de 2009 sur la réduction des  
toxiques

Expiry Date: **June 30, 2017**

License No.  
**TSRP0194**

Date d'expiration:

*D. Salamon*

Director  
(Directeur/Trices)

## TRP Toxic Substance Quantification and Accounting Summary

Required Information	Subject Waste	2013	2014	2015	2016	Change, %	Change (tone)
Used (tone)	Zinc	336.28	413.70	372.48	274.62	↓ 26.28	↓ 97.86
Created (tone)	Zinc	0	0	0	0	0	0
Sent to landfill (tone)	Zinc	29.68	15.48	13.99	14.03	↑ .003	↑ 0.04

The amount of substance used in 2016 is lower in comparison with 2015 due to a decrease in production. The slight increase to landfill is the result of an equipment malfunction which disallowed the curing of rubber and our ability to send product for recycling.

In addition to the above, lead was identified, for the first time, in the NPRI 2016 reporting. As a result, the Toxic Reduction Plan is in the process of being updated and will be submitted prior to December 2017 per TRA. Following is the NPRI data for Lead.

Required Information	Subject Waste	2016	Change, %	Change (tone)
Used (kg)	Lead	5,391	0	0
Created (kg)	Lead	0	0	0
Sent to landfill (kg)	Lead	122.47	0	0

### Changes in Quantification Methods

No change in Quantification Methods during this reporting period

### Substances removed from the report

No substances were removed from the report.

### Amendments to Toxic Substance Reduction Plans

There have been no changes to the Original Toxic Reduction Plan, November 28, 2014.

## HRE Statement

As of 05/26/2017, I, Andrew Haber certify that I have read the report on the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the information contained in the report is factually accurate and the report complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act. As stated above, an update to the plan is in progress to include Lead.

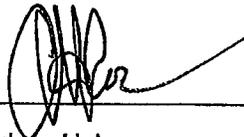
[Zinc]

A handwritten signature in black ink, appearing to read "Haber", written in a cursive style.

Andrew Haber  
Vice President & General Manager  
Polycorp Ltd.

## Certifications

As of November 28, 2014, I Andrew Haber, certify that I have read the Toxic Substance Reduction Plan for Zinc and am familiar with its contents, and to my knowledge the Plan is factually accurate and complies with the Toxic Reduction Act, 2009 and Ontario Regulation 455/09 made under the Act.

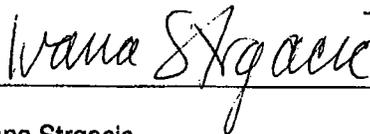


Andrew Haber  
Vice President & General Manager, Polycorp Ltd.

As of November 28, 2014, I Ivana Strgacic, certify that I am familiar with each of the processes at Polycorp Ltd. facility that use Zinc, and that I agree with:

- a) the estimate of the amount by which these processes use the toxic substances
- b) the estimate of the amount by which the creation of the toxic substance at the facility will be reduced as a result of implementing the option, if the substance is created at the facility, and
- c) the estimate of the amount by which discharges of the toxic substance to air, land or water will be reduced as a result of implementing the option, if the substance is discharged to air, land or water

that are set out in the plan dated November 17, 2014, and that the Plan complies with the Toxic Reduction Act, 2009 and Ontario Regulation 455/09 made under the Act.



Ivana Strgacic  
Toxic Substances Reduction Planner  
President, Strategies for the Environment Inc.