

**Toxic Reduction Act: Public Summary Report
2019 Reporting Year**

Goodall Rubber Co. of Canada LP

A. FACILITY INFORMATION

Goodall Rubber manufactures custom industrial rubber hose for general purpose, air, agricultural, chemical, food, oxygen, material handling, petroleum, steam, water, and specialty markets. Goodall produces over 3000 specifications of hose based on proprietary rubber compound recipes. The final products vary by length, diameter, and type of rubber.

Company	Goodall Rubber Company of Canada LP
Address	530 Third Street Collingwood, Ontario L9Y 4X6
Spatial Coordinates	UTM Zone: 17 UTM Easting: 560768 UTM Northing: 49727272
NPRI ID	10091
2 Digit NAICS Code	31-33 – Manufacturing
4 Digit NAICS Code	3262 – Rubber Product Manufacturing
6 Digit NAICS Code	326220 – Rubber and Plastic Hose and Belting Manufacturing
Number of Employees	56
Public Contact	Mr. Karl Letsche Plant Manager Goodall 530 Third Street Collingwood, ON L9Y 4X6 Phone: (705) 445-1551 x9 Email: kletsche@goodalhoses.com
Highest Ranking Employee	Mr. Karl Letsche Plant Manager Goodall 530 Third Street Collingwood, ON L9Y 4X6 Phone: (705) 445-1551 x9 Email: kletsche@goodalhoses.com
Report Prepared By	Mr. Spencer Savoie Environmental Health and Safety Coordinator Goodall 530 Third Street Collingwood, ON L9Y 4X6 Phone: (705) 445-1551 x2 Email: spencer.savoie@goodalhoses.com

Parent Company	ERIKS Industrial Services LP 9748 12 th Avenue S.W. Edmonton, Alberta T6X 0J5 Phone: (780) 437-1260
Parent Company Contact	Pierre Charbonneau Environment, Health, Safety, and Quality Manager – Canada 9748 12 th Avenue S.W. Edmonton, Alberta T6X 0J5 Phone: (905) 728-1656

B. TOXIC SUBSTANCE ACCOUNTING

Substance Reported	CAS #	Primary Use
Zinc (and its compounds)	NA-14	Contained in Rubber Compounds
Speciated VOC – Chlorobenzene – Exit Report Created	108-90-7	Rubber Cement Solvent
Speciated VOC – Heptane	NA-31	Solvent / Lubricant
Speciated VOC – Light Aromatic Solvent Naphtha	64742-95-6	Solvent

C. SUBSTANCE ACCOUNTING DETAILS

Substance & Category	Quantities				Reason(s) for Change
	2019	2018	Annual Difference		
	(Metric tonnes)	(Metric tonnes)	(Metric tonnes)	(%)	
<i>NPRI Part 1 Substance</i>					
<i>Zinc (and its compounds)</i>					
<i>CAS#: NA - 14</i>					
Used	8.96	13.059	(-)4.10	(-)31.39	Decreased Production
Created	0	0	0	0	
Contained in Product	8.96	13.059	(-)4.10	(-)31.39	Decreased Production
Released to Air	0	0	0	0	
Released to Water	0	0	0	0	
Released to Land	0	0	0	0	
Transfer for Disposal	0.364	0.679	(-)0.315	(-)46.39	Decreased Production
Transfer for Recycling	0	0	0	0	
<i>NPRI Part 1 Substance (No longer Part 4 & 5 Substance) – Exit Report Created</i>					
<i>Speciated VOC – Chlorobenzene</i>					
<i>CAS#: 108-90-7</i>					
Used	0.67	1.55	(-)0.88	(-)56.77	Decreased Production in specific product mix
Created	0	0	0	0	
Contained in Product	0	0	0	0	

Released to Air	0.67	1.55	(-)0.88	(-)56.77	Decreased Production in specific product mix
Released to Water	0	0	0	0	
Released to Land	0	0	0	0	
Transfer for Disposal	0	0	0	0	
Transfer for Recycling	0	0	0	0	
<i>NPRI Part 4 & 5 Substance Speciated VOC – Heptane CAS#: NA - 31</i>					
Used	13.462	16.058	(-)2.596	(-)16.16	Decreased Production
Created	0	0	0	0	
Contained in Product	0	0	0	0	
Released to Air	13.462	16.058	(-)2.596	(-)16.16	Decreased Production
Released to Water	0	0	0	0	
Released to Land	0	0	0	0	
Transfer for Disposal	0	0	0	0	
Transfer for Recycling	0	0	0	0	
<i>NPRI Part 4 & 5 Substance Speciated VOC – Light Aromatic Solvent Naphtha CAS#: 64742-95-6</i>					
Used	3.043	4.654	(-)1.611	(-)34.62	Decreased Production
Created	0	0	0	0	
Contained in Product	0	0	0	0	
Released to Air	3.043	4.654	(-)1.611	(-)34.62	Decreased Production
Released to Water	0	0	0	0	
Released to Land	0	0	0	0	
Transfer for Disposal	0	0	0	0	
Transfer for Recycling	0	0	0	0	

*VOC = Volatile Organic Compound

**Used = The amount of a substance which enters a process as the substance itself or as a constituent of another substance.

D. TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES

List of Substances
Zinc
Chlorobenzene – Exit Report Created in 2018
Heptane
Light Aromatic Solvent Naphtha

Planner Information		
Planner Responsible for Making Recommendations	Mr. Erik Martinez P.Eng Environmental Consultant Planner License No. TSRP0005 Phone: (519) 884-0510 ext. 2342 Email: emartinez@croworld.com	Conestoga-Rovers & Associates Limited 651 Colby Drive Waterloo, ON N2V 1C2
Planner Responsible for Certification	Mr. Erik Martinez P.Eng Environmental Consultant Planner License No. TSRP0005 Phone: (519) 884-0510 ext. 2342 Email: emartinez@croworld.com	Conestoga-Rovers & Associates Limited 651 Colby Drive Waterloo, ON N2V 1C2

Toxic Reduction Policy Statement of Intent:

Goodall Rubber Company of Canada LP (Goodall) is committed to playing a leadership role in protecting the environment. Whenever feasible, we will reduce the use and releases of all reportable substances in compliance with all Federal and Provincial Regulations.

Statement of Intent to Reduce Use:

Toxic Substance Reduction Plan does not include a statement to reduce the use of the substance Zinc, Chlorobenzene, Heptane, or Light Aromatic solvent Naphtha because:

Goodall prides itself on technological innovation in order to produce high quality rubber hoses. Through this plan, Goodall evaluated the technical and economic feasibility of potential reduction options for the substances described below. At this time there are no options identified that can be implemented by Goodall to reduce the use of Zinc, Chlorobenzene, Heptane or Light Aromatic Solvent Naphtha.

Statement of Intent to Reduce Creation:

Toxic Substance Reduction Plan does not include a statement to reduce the creation of the substance Zinc, Chlorobenzene, Heptane, or Light Aromatic Solvent Naphtha because:

Goodall does not create any of these substances.

Toxic Substance Objectives and Targets:

Substance	Objectives	Target
Zinc (and its Compounds)	The objectives of this plan was for Goodall to examine the technical and economic feasibility of several options to determine which, if any, were viable for implementation.	No Target
Speciated VOC – Chlorobenzene	The objective of this plan was to identify and evaluate the technical and economic feasibility of potential reduction options to reduce the use of chlorobenzene.	No Target
Speciated VOC - Heptane	The objectives of this plan are to evaluate the technical and economic feasibility of potential reduction options to reduce the use of heptane.	No Target
Speciated VOC – Light Aromatic Solvent Naphtha	The objectives of this plan are to evaluate the technical and economic feasibility of potential reduction options to reduce the use of heptane.	No Target

*No actions were taken outside the plan that reduced the use or creation of the substances.

Toxic Substance Reduction Option to be Implemented:

There were no options identified that can be implemented by Goodall to reduce the use of Zinc, Chlorobenzene, Heptane, or Light Aromatic Solvent Naphtha.

Plan Summary Statement:

This plan summary accurately reflects the content of the toxic substance reduction plans for Zinc, Chlorobenzene, Heptane, or Light Aromatic Solvent Naphtha.

E. Certification Statement from Highest Ranked Employee

As of **18/08/20**, I, **Karl Letsche**, certify that I have read the reports on the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the information contained in the reports is factually accurate and the reports comply with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

- Zinc (and its compounds)
- Chlorobenzene
- Heptane
- Light Aromatic Solvent Naphtha

Karl Letsche

Karl Letsche
Plant Manager
Goodall Rubber Company of Canada LP

Aug 18th 2020

Date