



**Rohm and Haas Canada LP,  
a wholly owned subsidiary of  
The Dow Chemical Company  
Toxics Reduction Act  
Public Annual Summary Report  
Reporting Year 2016**

Issue Date: 26-May-2017

**Purpose**

Rohm and Haas Canada LP, a wholly owned subsidiary of The Dow Chemical Company is regulated under the Toxics Reduction Act, 2009 and Ontario Regulation 455/09. The act and regulation require that a summary of data submitted to the Ontario Ministry of the Environment under the Act is made public.

**Dow is a Responsible Care®  
Company**

Dow Canada and as such Rohm and Haas Canada LP's West Hill site is a member of the Chemistry Industry Association of Canada (<http://www.canadianchemistry.ca/>) and as such follows the association's [Responsible Care®](#) initiative. Responsible Care was developed in Canada in 1988 as a program to collectively improve the environmental, health and safety performance of member companies. Responsible Care has been very successful in this regard and has expanded into a global movement, now practiced in more than 60 countries around the world, and overseen by the International Council of Chemical Associations (<https://www.icca-chem.org>).

Responsible Care® is the chemistry industry's commitment to sustainability – the betterment of society, the environment, and the economy. Through Responsible Care®, CIAC member-companies strive to “do the right thing and be seen to do the right thing.”

Responsible Care® covers all aspects of our company's business, over the entire life cycle of our products. In addition, Dow Canada and our Site Leader Greg Johnston must annually reaffirm their commitment to the [Ethic and Principles for Sustainability](#), and the [Codes of Practice](#), and undergo a regular third-party verification process that allows independent experts and members of the public to verify that they're living up to the standards set by Responsible Care®.

Dow Canada was successfully reverified in 2016 by outside community and industry verifiers. To view the latest report, visit [http://www.canadianchemistry.ca/responsible\\_care/uploads/2016\\_Dow.pdf](http://www.canadianchemistry.ca/responsible_care/uploads/2016_Dow.pdf) Dow Canada will be reverified again in 2019.

A key component of Responsible Care is to innovate for safer products and processes that conserve resources, reduce risk and enhance value. This is accomplished through a regular review of products and processes.

At Dow's West Hill site we addressed this through the key codes of practice for Responsible Care which include: Operations, Stewardship and Accountability.

**Dow is a Responsible Care®  
 Company, continued**

Dow Canada has embraced the goals of the chemistry industry's Responsible Care initiative and applied them throughout our processes and facilities. We dedicate ourselves, our technology and our business practices to sustainability - the betterment of society, the environment and the economy.

The principles of Responsible Care® are key to our business success, and compel us to continually innovate for safer and greener products and processes, and work to continuously improve our environmental, health and safety performance.

**NPRI Identification Number**

2065

**MOE O.Reg 127/01  
 Identification Number**

n/a

**Legal Name and Facility Address  
 of the Owner and Operator of  
 the facility**

Rohm and Haas Canada LP  
 2 Manse Road  
 Toronto, ON  
 M1E 3T9

**Mailing Address**

Same as Facility Address

**Number of Full-Time Employees**

73

**North American Industry  
 Classification System (NAICS)  
 2, 4 and 6 digit code**

31-33 - Manufacturing  
 3255 - Paint, Coating and Adhesive Manufacturing  
 325510 - Paint and Coating Manufacturing

**Public Contact**

Shawna M. Bruce  
 Public Affairs Manager  
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**UTM Coordinates**

Easting: 647152 Northing: 4846708 Zone: 17T

**Legal Canadian Parent  
 Company**

3243425 Nova Scotia Company 100% Ownership  
 2 Manse Road  
 Toronto, ON  
 M1E 3T9

**Name of all toxic substances for  
 which plans are required to be  
 prepared**

Acrylic Acid (and its salts)	Methyl methacrylate
Acrylonitrile	Methylolacrylamide
Acrylamide	Octylphenol ethoxylates
Ammonia	Styrene
Butyl acrylate	Sulphuric Acid
Ethyl acrylate	Zinc (and its compounds)
Ethylene Glycol	

**Acrylic Acid**

<b>Substance Name</b>	Acrylic Acid (and its salts)
<b>CAS Number</b>	79-10-7

**Date of Toxic Reduction Plan**

18-December-2013

**Reduction Objective and Target**

A reduction of the use and creation of Acrylic Acid and its salts as well as a reduction of emissions, transfer and disposal is not targeted at this point.

**Description of Steps and Effectiveness**

Not applicable.

**Amendments**

There have been no amendments to the plan in the reporting period.

**Substance Accounting**

	<b>2016</b>	<b>2015</b>	<b>Year over Year change</b>
<b>On a facility basis:</b>	<b>Unit:</b>	<b>Unit:</b>	<b>Unit:</b>
	<b>[Tonnes]</b>	<b>[Tonnes]</b>	<b>[%]</b>
Amount that entered the facility as the substance itself or as a constituent of another substance	100 – 1000	100 – 1000	9.12
Amount of the substance that was created	1-10	1-10	-25.5
Amount contained in product	0-1	0-1	0
Total Quantity Released (All Media)	0.003	0.003	0
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	3.435	4.615	-25.6
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review**

Not applicable.

**Acrylonitrile**

<b>Substance Name</b>	Acrylonitrile
<b>CAS Number</b>	107-13-1

**Date of Toxic Reduction Plan**

18-December-2013

**Reduction Objective and Target**

A reduction of the use of Acrylonitrile, as well as a reduction of emissions, transfer and disposal is not targeted at this point.

**Description of Steps and Effectiveness**

Not applicable.

**Amendments**

There have been no amendments to the plan in the reporting period.

**Substance Accounting**

	2016	2015	Year over Year change
<b>On a facility basis:</b>	<b>Unit:</b>	<b>Unit:</b>	<b>Unit:</b>
	<b>[Tonnes]</b>	<b>[Tonnes]</b>	<b>[%]</b>
Amount that entered the facility as the substance itself or as a constituent of another substance	1,000 – 10,000	1,000 – 10,000	-9.43
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	0 – 1	0 – 1	13.5
Total Quantity Released (All Media)	0.253	0.384	-34.1
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.207	0.205	0.98
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review**

Not applicable.

**Acrylamide**

<b>Substance Name</b>	Acrylamide
<b>CAS Number</b>	79-06-1

**Date of Toxic Reduction Plan**

17-December-2012

**Reduction Objective and Target**

A further reduction of Acrylamide emissions and disposals at this point is not technically feasible but we remain committed to evaluate new technologies as they become available.

**Description of Steps and Effectiveness**

Not applicable.

**Amendments**

There have been no amendments to the plan in the reporting period.

Substance Accounting	2016	2015	Year over Year change
On a facility basis:	Unit: [Tonnes]	Unit: [Tonnes]	Unit: [%]
Amount that entered the facility as the substance itself or as a constituent of another substance	10 – 100	10 – 100	8.16
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	0 – 1	0 – 1	0
Total Quantity Released (All Media)	0.0002	0.0001	100
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.041	0.039	5.13
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review** Not applicable.

**Ammonia**

<b>Substance Name</b>	Ammonia (total)
<b>CAS Number</b>	no single CAS RN applies to this substance

**Date of Toxic Reduction Plan** 18-December-2013

**Reduction Objective and Target** A further reduction of Ammonia usage as well as a reduction of emissions and transfers at this point is not technically or economically feasible but we remain committed to evaluate new technologies as they become available.

**Description of Steps and Effectiveness** Not applicable.

**Amendments** There have been no amendments to the plan in the reporting period.

Substance Accounting	2016	2015	Year over Year change
On a facility basis:	Unit: [Tonnes]	Unit: [Tonnes]	Unit: [%]
Amount that entered the facility as the substance itself or as a constituent of another substance	100 – 1000	100 – 1000	1.52
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	100 – 1000	100 – 1000	0.63

**Substance Accounting**

Cont'd

	2016	2015	Year over Year change
<b>On a facility basis:</b>	<b>Unit:</b>	<b>Unit:</b>	<b>Unit:</b>
	<b>[Tonnes]</b>	<b>[Tonnes]</b>	<b>[%]</b>
Total Quantity Released (All Media)	2.180	1.899	6.09
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	1.442	1.240	16.3
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review**

Not applicable.

**Butyl acrylate**

<b>Substance Name</b>	Butyl acrylate
<b>CAS Number</b>	141-32-2

**Date of Toxic Reduction Plan**

18-December-2013

**Reduction Objective and Target**

A reduction of the use of Butyl acrylate, as well as a reduction of emissions, transfer and disposal is not targeted at this point.

**Description of Steps and Effectiveness**

Not applicable.

**Amendments**

There have been no amendments to the plan in the reporting period.

**Substance Accounting**

	2016	2015	Year over Year change
<b>On a facility basis:</b>	<b>Unit:</b>	<b>Unit:</b>	<b>Unit:</b>
	<b>[Tonnes]</b>	<b>[Tonnes]</b>	<b>[%]</b>
Amount that entered the facility as the substance itself or as a constituent of another substance	10,000 – 100,000	10,000 – 100,000	-1.50
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	1 – 10	1 – 10	-5.68
Total Quantity Released (All Media)	0.192	0.240	-19.9
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.029	0.031	-6.86
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review**

Not applicable.

**Ethyl acrylate**

<b>Substance Name</b>	Ethyl acrylate
<b>CAS Number</b>	140-88-5

**Date of Toxic Reduction Plan**

18-December-2013

**Reduction Objective and Target**

A reduction of the use of Ethyl acrylate, as well as a reduction of emissions, transfer and disposal is not targeted at this point.

**Description of Steps and Effectiveness**

Not applicable.

**Amendments**

There have been no amendments to the plan in the reporting period.

**Substance Accounting**

	<b>2016</b>	<b>2015</b>	<b>Year over Year change</b>
<b>On a facility basis:</b>	<b>Unit:</b>	<b>Unit:</b>	<b>Unit:</b>
	<b>[Tonnes]</b>	<b>[Tonnes]</b>	<b>[%]</b>
Amount that entered the facility as the substance itself or as a constituent of another substance	1,000 – 10,000	1,000 – 10,000	3.54
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	0 – 1	0 – 1	-2.47
Total Quantity Released (All Media)	0.029	0.072	-60.8
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.002	0.014	-82.9
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review**

Not applicable.

**Ethylene Glycol**

<b>Substance Name</b>	Ethylene Glycol
<b>CAS Number</b>	107-21-1

**Date of Toxic Reduction Plan**

7-December-2015

**Reduction Objective and Target**

A reduction of Ethylene glycol usage at this point is not technically or economically feasible.

**Description of Steps and Effectiveness**

Not applicable.

**Amendments** There have been no amendments to the plan in the reporting period.

<b>Substance Accounting</b>	<b>2016</b>	<b>2015</b>	<b>Year over Year change</b>
<b>On a facility basis:</b>	<b>Unit: [Tonnes]</b>	<b>Unit: [Tonnes]</b>	<b>Unit: [%]</b>
Amount that entered the facility as the substance itself or as a constituent of another substance	10 – 100	10 – 100	-43.5
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	10 – 100	10 – 100	-43.7
Total Quantity Released (All Media)	0.0001	0.0002	-50.0
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.085	0.130	-34.6
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review** Not applicable.

<b>Methyl methacrylate</b>	<b>Substance Name</b>	Methyl methacrylate
	<b>CAS Number</b>	80-62-6

**Date of Toxic Reduction Plan** 18-December-2013

**Reduction Objective and Target** A reduction of the use of Methyl methacrylate, as well as a reduction of emissions, transfer and disposal is not targeted at this point.

**Description of Steps and Effectiveness** Not applicable.

**Amendments** There have been no amendments to the plan in the reporting period.

<b>Substance Accounting</b>	<b>2016</b>	<b>2015</b>	<b>Year over Year change</b>
<b>On a facility basis:</b>	<b>Unit: [Tonnes]</b>	<b>Unit: [Tonnes]</b>	<b>Unit: [%]</b>
Amount that entered the facility as the substance itself or as a constituent of another substance	10,000 – 100,000	10,000 – 100,000	-0.89
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	0 – 1	0 – 1	19.9



Substance Accounting Cont'd	2016	2015	Year over Year change
	Unit: [Tonnes]	Unit: [Tonnes]	Unit: [%]
<b>On a facility basis:</b>			
Total Quantity Released (All Media)	0.064	0.120	-46.46
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.478	0.016	2888
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review** Not applicable.

<b>Methylol acrylamide</b>	<b>Substance Name</b>	N-Methylolacrylamide
	<b>CAS Number</b>	924-42-5

**Date of Toxic Reduction Plan** 18-December-2013

**Reduction Objective and Target** A reduction of the use of n-Methylolacrylamide, as well as a reduction of emissions, transfer and disposal is not targeted at this point.

**Description of Steps and Effectiveness** Not applicable.

**Amendments** There have been no amendments to the plan in the reporting period.

Substance Accounting	2016	2015	Year over Year change
	Unit: [Tonnes]	Unit: [Tonnes]	Unit: [%]
<b>On a facility basis:</b>			
Amount that entered the facility as the substance itself or as a constituent of another substance	10 – 100	10 – 100	-4.91
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	0 – 1	0 – 1	-12.5
Total Quantity Released (All Media)	0.000	0.000	0
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.000	0.000	0
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review** Not applicable.

**Octylphenol and its ethoxylates**

<b>Substance Name</b>	Octylphenol and its ethoxylates
<b>CAS Number</b>	no single CAS RN applies to this substance

**Date of Toxic Reduction Plan**

18-December-2013

**Reduction Objective and Target**

A reduction of the use of Octylphenol and its ethoxylates, as well as a reduction of emissions, transfer and disposal is not targeted at this point.

**Description of Steps and Effectiveness**

Not applicable.

**Amendments**

There have been no amendments to the plan in the reporting period.

**Substance Accounting**

	<b>2016</b>	<b>2015</b>	<b>Year over Year change</b>
<b>On a facility basis:</b>	<b>Unit: [Tonnes]</b>	<b>Unit: [Tonnes]</b>	<b>Unit: [%]</b>
Amount that entered the facility as the substance itself or as a constituent of another substance	100 – 1,000	100 – 1,000	-8.46
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	100 – 1,000	100 – 1,000	-13.9
Total Quantity Released (All Media)	0.000	0.000	0
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.003	0.978	-99.7
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review**

Not applicable.

**Styrene**

<b>Substance Name</b>	Styrene
<b>CAS Number</b>	100-42-5

**Date of Toxic Reduction Plan**

18-December-2013

**Reduction Objective and Target**

A reduction of the use of Styrene, as well as a reduction of emissions, transfer and disposal is not targeted at this point.

**Description of Steps and Effectiveness** Not applicable.

**Amendments** There have been no amendments to the plan in the reporting period.

Substance Accounting	2016	2015	Year over Year change
	Unit: [Tonnes]	Unit: [Tonnes]	Unit: [%]
<b>On a facility basis:</b>			
Amount that entered the facility as the substance itself or as a constituent of another substance	1,000 – 10,000	1,000 – 10,000	5.90
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	0 – 1	0 – 1	-19.5
Total Quantity Released (All Media)	1.886	1.677	12.5
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.070	0.072	-2.78
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review** Not applicable.

**Sulphuric acid**

<b>Substance Name</b>	Sulphuric acid
<b>CAS Number</b>	7664-93-9

**Date of Toxic Reduction Plan** 18-December-2012

**Reduction Objective and Target** Through our commitment to Responsible Care®, Rohm and Haas Canada LP is committed to continuously improve our operations. We intend to reduce Sulfuric Acid usage by improving utility usage of our process.

We are targeting a reduction of 1,800 kg of Sulfuric Acid by reducing the amount of deionized water used in the manufacturing process.

**Description of Steps and Effectiveness** Activity: Reduce deionized water usage.

New backflow prevention requirements, mandating additional protection layers to maximise drinking water protection forced the proposed modification to be re-evaluated.

**Amendments** There have been no amendments to the plan in the reporting period.

**Substance Accounting**

	2016	2015	Year over Year change
<b>On a facility basis:</b>	<b>Unit:</b>	<b>Unit:</b>	<b>Unit:</b>
	[Tonnes]	[Tonnes]	[%]
Amount that entered the facility as the substance itself or as a constituent of another substance	10 – 100	10 – 100	-1.58
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	0 – 1	0 – 1	0
Total Quantity Released (All Media)	0.0004	0.0004	0
Off-site Transfer for Disposal	0.000	0.000	0
Off-site Transfer for Treatment	0.000	0.000	0
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review**

The plan targeted the engineering changes to be implemented in 2014. New backflow prevention requirements, mandating additional protection layers to maximise drinking water protection forced the proposed modification to be re-evaluated and re-engineered. The implementation is scheduled for 2017/2018. The delay in implementation has no impact on the quantity of emissions of Sulphuric Acid from the site but will reduce usage.

**Zinc (and its compounds)**

<b>Substance Name</b>	Zinc (and its compounds)
<b>CAS Number</b>	no single CAS RN applies to this substance

**Date of Toxic Reduction Plan**

17-December-2012

**Reduction Objective and Target**

A further reduction of Zinc emissions and disposals at this point is not feasible but we remain committed to evaluate new technologies as they become available.

**Description of Steps and Effectiveness**

Not applicable.

**Amendments**

There have been no amendments to the plan in the reporting period.

**Substance Accounting**

	2016	2015	Year over Year change
<b>On a facility basis:</b>	<b>Unit:</b>	<b>Unit:</b>	<b>Unit:</b>
	<b>[Tonnes]</b>	<b>[Tonnes]</b>	<b>[%]</b>
Amount that entered the facility as the substance itself or as a constituent of another substance	100 – 1000	100 – 1000	6.81
Amount of the substance that was created	0 – 1	0 – 1	0
Amount contained in product	100 – 1000	100 – 1000	9.25
Total Quantity Released (All Media)	0.000	0.000	0
Off-site Transfer for Disposal	0.013	0.013	0
Off-site Transfer for Treatment	0.117	0.108	7.96
Off-site Transfer for Recycling	0.000	0.000	0

**Progress Review**

Not applicable.

**Annual Report Certification Statement**

As of May 26, 2017, I certify that I have read the report on the toxic substance reduction plan for Acrylic Acid (and its salts); Acrylonitrile; Acrylamide; Ammonia (total); Butyl acrylate; Ethyl acrylate; Ethylene Glycol; Methyl methacrylate; Methylol acrylamide; Octylphenol ethoxylates; Styrene; Sulphuric Acid and Zinc (and its compounds) and am familiar with their contents and to my knowledge the information contained in the report is factually accurate and the report complies with the Toxic Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

Greg Johnston (original signature on file)  
 Greg Johnston, Site Leader, Rohm and Haas Canada LP

26-May-2017  
 Date