



Final Toxic Substance Reduction Summary Plans

Latham Pool Products Inc.
Ajax, Ontario Facility

December 9, 2013

BASIC FACILITY INFORMATION		
Substances Included in the Plans		
<ul style="list-style-type: none"> ▪ Ethyl Alcohol (CAS No. 64-17-5) ▪ Acetone (CAS No. 67-64-1) ▪ Styrene (CAS No. 100-42-5) 		
Facility Identification and Site Address		
Company Name	Latham Pool Products Inc.	
Facility Name	Ajax, Ontario facility	
Facility Address	Physical Address:	Mailing Address:
	430 Finley Avenue, Ajax, Ontario L1S 2E3	383 Elgin Street Brantford, Ontario N3S 7P5
Spatial Coordinates of Facility	UTM Zone 17 UTM Easting: 658357 UTM Northing: 4855799	
Number of Employees	35	
NPRI ID	0000007139	
Parent Company (PC) Information		
PC Name & Address	Latham Pool Products Inc.	383 Elgin Street Brantford, Ontario N3S 7P5
Percent Ownership for each PC	100%	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	32 (Manufacturing)	
4 Digit NAICS Code	3261 (Plastic Product Manufacturing)	
6 Digit NAICS Code	326121 (Unlaminated Plastic Profile Shape Manufacturing ^{US})	
Facility and Planner Contact Information		
Facility Public Contact	Harold Brooks	Latham Pool Products Inc.
	Email: haroldbrooks@lathampool.com	787 Watervliet Shaker Road Latham, NY 12110
	Phone: 5189511014	
Planner Responsible for Making Recommendations and Certification	Karri Legarrie	RWDI AIR Inc.
	Planner Licence No.: TSRP0065	Same as Person who Prepared the Plan
	Email: karri.legarrie@rwdi.com	
	Phone: (519) 823-1311 x 2510	

ETHYL ALCOHOL (CAS NO. 64-17-5)	
Statement of Intent	
Latham Pool Products Inc. is committed to being an industry leader in our manufacturing processes, and as a result, minimizing any negative impact on our environment; therefore, we are fully committed to operate our manufacturing plant(s) in accordance with all applicable environmental laws and regulations. In particular, our Ajax facility intends to reduce and eliminate, where possible, any listed substances wherever technically and operationally feasible.	
Objectives	
Latham Pool Products Inc., in compliance with the Toxics Reduction Act (2009) and O. Reg. 455/09, intends to reduce the use of Ethyl Alcohol by 100% (13.1 tonnes). This reduction is based on the successful final product testing. The estimated reduction is planned to be implemented within 2 years. Latham Pool Products Inc. will continue to investigate process efficiencies and continuous improvement initiatives in an effort to reduce this substance in the future.	
Description of Creation of Substance	
Latham Pool Products Inc. is a manufacturer of vinyl pool liners, fiberglass reinforced spill-over spas and swimming pool steps for residential markets. Ethyl Alcohol is present at a 5% concentration in the raw material, LABI 1721 polyester resin. Latham Pool Products Inc. uses Ethyl Alcohol as a chemical component in one of the two approved fiberglass base resins. This chemical is used as a viscosity enhancer in this resin. Product testing will be required to validate if any negative impacts to the quality of the final product. Latham Pool Products Inc. does not create this substance and in the event that this option does not successful we will continue to investigate process efficiencies and continuous improvement initiatives in an effort to reduce the use of this substance in the future.	
Description Option(s) to be Implemented	
One option was selected to be implemented under Materials or Feedstock Substitution: Substitute LABI 1721 with a similar resin not containing ethyl alcohol.	

This plan summary accurately reflects the current version of the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Latham Pool Products Inc. for Ethyl Alcohol, dated December 9, 2013.

ACETONE (CAS NO. 67-64-1)	
Statement of Intent	
Latham Pool Products Inc. is committed to being an industry leader in our manufacturing processes, and as a result, minimizing any negative impact on our environment; therefore, we are fully committed to operate our manufacturing plant(s) in accordance with all applicable environmental laws and regulations. In particular, our Ajax facility intends to reduce and eliminate, where possible, any listed substances wherever technically and operationally feasible.	
Objectives	
Latham Pool Products Inc., in compliance with the Toxics Reduction Act (2009) and O. Reg. 455/09, does not intend to reduce the use of Acetone under this plan. Latham Pool Products Inc. will continue to investigate process efficiencies and continuous improvement initiatives in an effort to reduce this substance in the future.	
Description of Creation of Substance	
Latham Pool Products Inc. is a manufacturer of vinyl pool liners, fiberglass reinforced spill-over spas and swimming pool steps for residential markets. Acetone is present at a 100% concentration in the raw material, Acetone. Latham Pool Products Inc. uses Acetone, as a cleaning agent in fiberglass application operations at this facility, on both the spray gun systems and the hand tools used to process the product after spraying. This chemical is one of the best and most cost effective cleaners available for these types of resins. Latham Pool Products Inc. does not create this substance and we will continue to investigate process efficiencies and continuous improvement initiatives in an effort to reduce the use of this substance in the future.	
Description Option(s) to be Implemented	
No reduction options will be implemented under this plan because they are either not technically feasible, the amount of reduction expected does not warrant the time and effort required to track any potential savings or they could not be verified due to fluctuations in our process due to the human factor involved. However, Latham Pool Products, Inc. has chosen to implement some of these options outside of this plan realizing that there is no downside and any savings realized is beneficial to both our cost and the environment.	

This plan summary accurately reflects the current version of the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Latham Pool Products Inc. for Acetone, dated December 9, 2013.

STYRENE (CAS NO. 100-42-5)	
Statement of Intent	
Latham Pool Products Inc. is committed to being an industry leader in our manufacturing processes, and as a result, minimizing any negative impact on our environment; therefore, we are fully committed to operate our manufacturing plant(s) in accordance with all applicable environmental laws and regulations. In particular, our Ajax facility intends to reduce and eliminate, where possible, any listed substances wherever technically and operationally feasible.	
Objectives	
Latham Pool Products Inc., in compliance with the Toxics Reduction Act (2009) and O. Reg. 455/09, does not intend to reduce the use of Styrene. Latham Pool Products Inc. will continue to investigate process efficiencies and continuous improvement initiatives in an effort to reduce this substance in the future.	
Description of Creation of Substance	
Latham Pool Products Inc. is a manufacturer of vinyl pool liners, fiberglass reinforced spill-over spas and swimming pool steps for residential markets. Styrene is present in the raw materials, polyester resin, polylite resin, vinyl resin, and gel coats. The polyester and polylite resins contain styrene at a concentration of 35%, a concentration of 44% - 60% for vinyl resins and at a concentration of 46% for gel coats. Latham Pool Products Inc. uses styrene because it is a major component in the base fiberglass resins we use. This chemical is a necessary bonding and curing agent that is included in the base resin used to produce fiberglass reinforcing products. This fiberglass is a key reinforcement system that is added to our spa and swimming pool stair systems manufactured at this facility and therefore it is not possible to eliminate the use of styrene in our process.	
Description Option(s) to be Implemented	
No reduction options will be implemented under this plan because they are either not technically feasible, the amount of reduction expected does not warrant the time and effort required to track any potential savings or they could not be verified due to fluctuations in our process due to the human factor involved. However, Latham Pool Products, Inc. has chosen to implement some of these options outside of this plan realizing that there is no downside and any savings realized is beneficial to both our cost and the environment.	

This plan summary accurately reflects the current version of the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Latham Pool Products Inc. for Styrene, dated December 9, 2013.



Certification by Highest Ranking Employee

As of December 9, 2013, I, Mohamed Rasheed, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

<u>Substance</u>	<u>Date of Certified Plan</u>
Ethyl Alcohol (CAS No. 64-17-5)	December 9, 2013
Acetone (CAS No. 67-64-1)	December 9, 2013
Styrene (CAS No. 100-42-5)	December 9, 2013

M. A. Rasheed DEC-9th-2013

Original signed copies are retained on-site.

Mohamed Rasheed
Plant Manager
Latham Pool Products Inc., Ajax

Certification by Licenced Planner

As of December 9, 2013, I, Karri Legarrie, certify that I am familiar with the processes at the Latham Pool Products Inc. Ajax facility that use or create the toxic substances 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 toxic substance reduction plans referred to below for the toxic substances and that the plans comply with the Act and Ontario Regulation 455/09 (General) made under that Act.

<u>Substance</u>	<u>Date of Certified Plan</u>
Ethyl Alcohol (CAS No. 64-17-5)	December 9, 2013
Styrene (CAS No. 100-42-5)	December 9, 2013
Acetone (CAS No. 67-64-1)	December 9, 2013



Original signed copies are retained on-site.

Karri Legarrie, Planner Licence TSRP0065
Air Quality Senior Scientist / Toxic Substance Reduction Planner
RWDI AIR Inc.