

Summary Letter as required under Toxics Reduction Act and Ontario Regulation 455/09

Section 1: General Facility Information

Business Name: Latham Pool Products Inc.
Street / Mailing Address: 383 Elgin Street
Brantford, Ontario
N3S 7P5

% Ownership: 100%

Facility Name: Latham Pool Products Inc.
Street / Mailing Address: 430 Finley Avenue
Ajax, Ontario
L1S 2E3

2 Digit, 4 Digit and 6 Digit NAICS ID: 32, 3261, 326121
NPRI ID: 0000007139
UTM Easting / UTM Northing: 658357 / 4855799
Number of Employees: 35

Public Contact: Debbie Gonzalez
Supervisor, Purchasing and Customs
383 Elgin Street
Brantford, Ontario
N2S 7P5
(519) 756-3442

Technical Contact: Harold Brooks
Manufacturing Engineering Manager
787 Watervliet Shaker Road
Latham, New York
12110
(519) 951-1014

Certifying Official: Mohamed Rasheed
Plant Manager
430 Finley Avenue
Ajax, Ontario
L1S 2E3
(905) 428-6990

Highest Ranking Employee: Mohamed Rasheed
Plant Manager
430 Finley Avenue
Ajax, Ontario
L1S 2E3
(905) 428-6990

Section 2: Prescribed Toxic Substances On-Site

Four toxic substances were identified to be reported on a facility wide basis under O. Reg. 455/09 as identified in Table 1 below.

Table 1: Substances Reported on a Facility Wide Basis

Substance Name	CAS	Units (tonnes)				Total Releases to Air	Total Off-Site Disposals and Transfers
		Enters the Facility (Use)	Creation	Destroyed			
Acetone	67-64-1	>1-10	0	0	>1-10	n/a	
Ethyl Alcohol	64-17-5	>1-10	0	0	>1-10	n/a	
Styrene	100-42-5	>10-100	0	>10-100	>1-10	n/a	
Total VOCs	NA-M16	>100-1000	0	0	>10-100	n/a	

For comparison purposes, the following table provides a summary of the 2013 and 2014 TRA Accounting values.

Table 2: 2013-2014 Comparison (tonnes)

Substance Name	Year	Amount Entering Process	Amount Created	Amount Released to Air	Amount Off-Site Disposal	Amount Contained in Product
Acetone 67-64-1	2013	1 to 10	0	8.81	n/a	0
	2014	1 to 10	0	6.23	n/a	0
	Change in % and Tonnes	Decrease of 29% or 2.58 tonnes	n/a	Decrease of 29% or 2.58 tonnes	n/a	n/a
	Rationale	Decreased chemical usage / production levels	No significant change	Decreased chemical usage / production levels	n/a	Decreased chemical usage
	No plans to reduce Acetone use.					

Substance Name	Year	Amount Entering Process	Amount Created	Amount Released to Air	Amount Off-Site Disposal	Amount Contained in Product
Ethyl Alcohol 64-17-5	2013	1 to 10	0	9.98	n/a	0
	2014	1 to 10	0	3.23	n/a	0
	Change in % and Tonnes	Decrease of 68% or 6.75 tonnes	n/a	Decrease 68 % or 6.75 tonnes	n/a	n/a
	Rationale	Decreased use of products containing ethyl alcohol and removal of ethyl alcohol in LABI1721 in Fall 2014.	n/a	Decreased use of products containing ethyl alcohol and removal of ethyl alcohol in LABI1721 in Fall 2014.	n/a	n/a
	The plan to reduce Ethyl Alcohol use, through the implementation of a Materials or Feedstock Substitution (Substitute LABI 1721 with a similar resin not containing ethyl alcohol) has occurred in 2014. Full elimination of ethyl alcohol from the process will be completed in 2015.					
Styrene 100-42-5	2013	100 to 1,000	0	11.39	n/a	0
	2014	10 to 100	0	9.25	n/a	0
	Change in % and Tonnes	Decrease of 19% or 20 tonnes	n/a	Decrease of 19% or 20 tonnes	n/a	n/a
	Rationale	Decreased use of products containing styrene	n/a	Decreased use of products containing styrene	n/a	n/a
	No plans to reduce Styrene use.					

Section 3: Certification by Highest Ranking Employee

As of June 1, 2015, I, Mohamed Rasheed certify that I have read the report on the toxic substance tracking, accounting and reporting for the toxic substances referred to above 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.

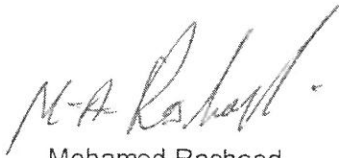
Latham Pool Products Inc.

Mohamed Rasheed
Plant Manager

Section 3: Certification by Highest Ranking Employee

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Latham Pool Products Inc.

A handwritten signature in black ink, appearing to read "M-A Rasheed", with a small checkmark at the end.

Mohamed Rasheed
Plant Manager