

## 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

## APPENDIX E

**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**

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

For comparison purposes, the following table provides a summary of the 2014 and 2015 TRA Accounting values.

**Table 2: 2014-2015 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	2014	1 to 10	0	6.23	n/a	0
	2015	1 to 10	0	5.67	n/a	0
	Change in % and Tonnes	Increase of 7.1% or 0.45 tonnes	n/a	Decrease of 9.0% or 0.56 tonnes	n/a	n/a
	Rationale	No significant change	No significant change	No significant change	n/a	n/a



Substance Name	Year	Amount Entering Process	Amount Created	Amount Released to Air	Amount Off-Site Disposal	Amount Contained in Product
	No plans to reduce Acetone use.					
Ethyl Alcohol 64-17-5	2014	1 to 10	0	3.23	n/a	0
	2015	0	0	0	n/a	0
	Change in % and Tonnes	Decrease of 100% or 3.23 tonnes	n/a	Decrease 100% or 3.23 tonnes	n/a	n/a
	Rationale	Eliminated ethyl alcohol from the LABI 1721 product used at the facility in 2015.	n/a	Eliminated ethyl alcohol from the LABI 1721 product used at the facility in 2015.	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) occurred in 2014. Full elimination of ethyl alcohol from the process was completed in 2015.					
Styrene 100-42-5	2014	10 to 100	0	9.25	n/a	0
	2015	10 to 100	0	8.93	n/a	0
	Change in % and Tonnes	Decrease of 3.5% or 2.97 tonnes	n/a	Decrease of 3.5% or 0.32 tonnes	n/a	n/a
	Rationale	No significant change	n/a	No significant change	n/a	n/a
	No plans to reduce Styrene use.					

### Section 3: Certification by Highest Ranking Employee

As of May 30, 2016, 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

Substance Name	Year	Amount Entering Process	Amount Created	Amount Released to Air	Amount Off-Site Disposal	Amount Contained in Product
	No plans to reduce Acetone use.					
Ethyl Alcohol 64-17-5	2014	1 to 10	0	3.23	n/a	0
	2015	0	0	0	n/a	0
	Change in % and Tonnes	Decrease of 100% or 3.23 tonnes	n/a	Decrease 100% or 3.23 tonnes	n/a	n/a
	Rationale	Eliminated ethyl alcohol from the LABI 1721 product used at the facility in 2015.	n/a	Eliminated ethyl alcohol from the LABI 1721 product used at the facility in 2015.	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) occurred in 2014. Full elimination of ethyl alcohol from the process was completed in 2015.					
Styrene 100-42-5	2014	10 to 100	0	9.25	n/a	0
	2015	10 to 100	0	8.93	n/a	0
	Change in % and Tonnes	Decrease of 3.5% or 2.97 tonnes	n/a	Decrease of 3.5% or 0.32 tonnes	n/a	n/a
	Rationale	No significant change	n/a	No significant change	n/a	n/a
	No plans to reduce Styrene use.					

### Section 3: Certification by Highest Ranking Employee

As of May 30, 2016, 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

*M. A. Rasheed*  
*Same IST-2016*

