

The Toxics Reduction Act (the Act) and associated Ontario Regulation 455/09 (O. Reg. 455/09) was introduced in the Province of Ontario in 2010; the Act requires regulated facilities to complete the following tasks.

- 1. Track, quantify and report annually on the toxic substances they use, create, release, dispose, transfer and contain in products.
- 2. Develop plans to reduce the use and creation of these substances.
- 3. Make annual reports and summaries of their plans available to their employees and the public.

**Section 1: General Facility Information**

**Business/Facility Name:** John Zubick Limited

**Street / Mailing Address:** 105 Clarke Road  
London, Ontario  
N5W 5C9

**NAICS ID:** 331490  
**NPRI ID:** 7325  
**Latitude / Longitude:** 42.98590 / -81.16750  
**Number of Employees:** 55

**Technical Contact Highest Ranking Employee, Certifying Official:** Bruce Zubick  
Vice President  
(519) 451-5470  
105 Clarke Road  
London, Ontario  
N5W 5C9

**Company Public Contact:** Matthew Zubick  
Environmental Manager  
(519) 451-5470  
105 Clarke Road  
London, Ontario  
N5W 5C9

## Section 2: Prescribed Toxic Substances On-Site

Twenty-two (22) toxic substances were identified to be reported on a facility wide basis under O. Reg. 455/09. A summary of these substances is provided in Table 1 below. A summary of the reasons for changes in quantification of substances between calendar years is also provided below.

Cadmium (and its compounds), and lead (and its compounds) were not reported in 2018 but are reported in 2019 as they exceeded reporting thresholds.

**Table 1: Substances Reported on a Facility Wide Basis<sup>[1]</sup>**

Substance Name	Reporting Year	CAS	Units	Use	Creation	Contained in Product	Releases to Air	Transfers for Recycling	Disposals
Cadmium (and its compounds)	2018	NA-14	kg	-	-	-	-	-	-
	2019			6.6	0.04	-	0.04	-	6.6
	Change			-	-	-	-	-	-
	% Change			n.a.	-	-	n.a.	-	n.a.
Lead (and its compounds)	2018	NA – 08	kg	-	-	-	-	-	-
	2019			152	4.2	-	9.7	-	147
	Change			-	-	-	-	-	-
	% Change			n.a.	-	-	n.a.	-	n.a.
Hexachlorobenzene	2018	118-74-1	g	0	0	0	0	-	-
	2017			0	0	0	0	-	-
	Change			0	0	0	0	-	-
	% Change			0	0	0	0	-	-
PM10 <sup>[2]</sup>	2018	NA – M09	Tonnes	0	4.588	-	4.588	-	-
	2019			0	7.753	-	7.753	-	-
	Change			0	3.165	-	3.165	-	-
	% Change			0	+69	-	+69	-	-
PM2.5 <sup>[2]</sup>	2018	NA – M10	Tonnes	0	0.869	-	0.869	-	-
	2019			0	4.495	-	4.495	-	-
	Change			0	3.626	-	3.626	-	-
	% Change			0	+419	-	+419	-	-
1,2,3,4,6,7,8-Heptachlorodibenzofuran	2018	67562-39-4	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change			0	0	0	0	-	-
	% Change			0	0	0	0	-	-
1,2,3,4,6,7,8-Heptachlorodibenzodioxin	2018	35822-46-9	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change			0	0	0	0	-	-
	% Change			0	0	0	0	-	-
	2018		g TEQ	0	0	0	0	-	-

Substance Name	Reporting Year	CAS	Units	Use	Creation	Contained in Product	Releases to Air	Transfers for Recycling	Disposals
1,2,3,4,7,8,9-Heptachlorodiben zofuran	2019	55673-89-7		0	0	0	0	-	-
	Change			0	0	0	0	-	-
	% Change		%	0	0	0	0	-	-
1,2,3,4,7,8-Hexachlorodiben zofuran	2018	70648-26-9	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change		0	0	0	0	-	-	
	% Change		%	0	0	0	0	-	-
1,2,3,4,7,8-Hexachlorodiben zopdioxin	2018	39227-28-6	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change		0	0	0	0	-	-	
	% Change		%	0	0	0	0	-	-
1,2,3,6,7,8-Hexachlorodiben zofuran	2018	57117-44-9	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change		0	0	0	0	-	-	
	% Change		%	0	0	0	0	-	-
1,2,3,6,7,8-Hexachlorodiben zopdioxin	2018	57653-85-7	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change		0	0	0	0	-	-	
	% Change		%	0	0	0	0	-	-
1,2,3,7,8,9-Hexachlorodiben zofuran	2018	72918-21-9	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change		0	0	0	0	-	-	
	% Change		%	0	0	0	0	-	-
1,2,3,7,8,9-Hexachlorodiben zopdioxin	2018	19408-74-3	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change		0	0	0	0	-	-	
	% Change		%	0	0	0	0	-	-
1,2,3,7,8-Pentachlorodiben zofuran	2018	57117-41-6	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change		0	0	0	0	-	-	
	% Change		%	0	0	0	0	-	-
1,2,3,7,8-Pentachlorodiben zopdioxin	2018	40321-76-4	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change		0	0	0	0	-	-	
	% Change		%	0	0	0	0	-	-
2,3,4,6,7,8-Hexachlorodiben zofuran	2018	60851-34-5	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change		0	0	0	0	-	-	
	% Change		%	0	0	0	0	-	-
	2018		g TEQ	0	0	0	0	-	-

Substance Name	Reporting Year	CAS	Units	Use	Creation	Contained in Product	Releases to Air	Transfers for Recycling	Disposals
2,3,4,7,8-Pentachlorodiben zofuran	2019	57117-31-4		0	0	0	0	-	-
	Change			0	0	0	0	-	-
	% Change			%	0	0	0	0	-
2,3,7,8-Tetrachlorodiben zofuran	2018	51207-31-9	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change			0	0	0	0	-	-
	% Change			%	0	0	0	0	-
2,3,7,8-Tetrachlorodiben zop dioxin	2018	1746-01-6	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change			0	0	0	0	-	-
	% Change			%	0	0	0	0	-
Octachlorodibenz ofuran	2018	39001-02-0	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change			0	0	0	0	-	-
	% Change			%	0	0	0	0	-
Octachlorodibenz opdioxin	2018	3268-87-9	g TEQ	0	0	0	0	-	-
	2019			0	0	0	0	-	-
	Change			0	0	0	0	-	-
	% Change			%	0	0	0	0	-

Notes [1] Lead and Cadmium (and their compounds) did not meet the reporting requirements for NPRI in the 2018 but did for 2019

[1] Quantities include road dust for particulate matter

### Section 3: Summary of Changes

A summary of reasons for changes in quantification of substances include:

- Metals – Disposal of contaminated soils when required. Disposal of contaminated soils occurred in 2019 which only happens approximately once every two to three years. This resulted in an increase in cadmium and lead disposals in 2019 compared to 2018. Additionally, an increase to releases to air for lead occurred in 2019 due to the inclusion of two new baghouses on site. This is the first year these emissions were included and increased the release to air of lead.
  - Dioxins and furans and Hexachlorobenzene- These compounds can be created during the smelting process. No aluminum smelting occurred on site in either 2018 or 2019, indicating that these compounds were not released in either year. The substance remains unchanged.
- PM<sub>2.5</sub> and PM<sub>10</sub> – An increase in the calculated amount of emissions to the air due to the inclusion of emissions from baghouses led to an increase in reportable air emissions. TSP –

continues to be below the NPRI reporting threshold. Conservative estimates for baghouse were used.

## Section 4: Toxic Substance Reduction Plan Update

Table 2 contains an update of the Toxic Substance Reduction Plans submitted under O. Reg. 455/09.

**Table 2: Toxic Substance Plans**

2019 Toxic Substance Plans – John Zubick Limited		
Substance Name	CAS#	Objectives/Reduction/Comparison to Plan
<b>Metals</b>		
Cadmium (and its compounds)	NA-14	<p><b>OBJECTIVES:</b> John Zubick Limited has no target reduction level for these substances.</p> <p><b>REDUCTIONS:</b> Dust suppressant was applied to gravel roads in the summer of 2019 No other actions were implemented for reduction in the 2019 reporting year.</p> <p><b>AMENDMENTS:</b> No amendments were made to the toxic reduction plan during the 2019 reporting year.</p> <p><b>COMPARISON TO PLAN:</b> John Zubick Limited continued to implement its road dust management plan. No additional steps were taken during the 2019 reporting year</p>
Lead (and its compounds)	NA-08	
<b>Dioxins, furans &amp; hexachlorobenzene</b>		
<i>Hexachlorobenzene</i>	118-74-1	<p><b>OBJECTIVES:</b> John Zubick Limited has no target reduction level for these substances.</p> <p><b>REDUCTIONS:</b> No actions were implemented for reduction in the 2019 reporting year.</p> <p><b>AMENDMENTS:</b> No amendments were made to the toxic reduction plan during the 2019 reporting year.</p> <p><b>COMPARISON TO PLAN:</b> No additional steps were taken during the 2019 reporting year.</p>
<i>1,2,3,4,6,7,8Heptachlorodibenzofuran</i>	67562-39-4	
<i>1,2,3,4,6,7,8Heptachlorodibenzopdioxin</i>	35822-46-9	
<i>1,2,3,4,7,8,9Heptachlorodibenzofuran</i>	55673-89-7	
<i>1,2,3,4,7,8Hexachlorodibenzofuran</i>	70648-26-9	
<i>1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin</i>	39227-28-6	
<i>1,2,3,6,7,8-Hexachlorodibenzofuran</i>	57117-44-9	
<i>1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin</i>	57653-85-7	
<i>1,2,3,7,8,9-Hexachlorodibenzofuran</i>	72918-21-9	
<i>1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin</i>	19408-74-3	
<i>1,2,3,7,8-Pentachlorodibenzofuran</i>	57117-41-6	
<i>1,2,3,7,8-Pentachlorodibenzo- p-dioxin</i>	40321-76-4	
<i>2,3,4,6,7,8-Hexachlorodibenzofuran</i>	60851-34-5	
<i>2,3,4,7,8-Pentachlorodibenzofuran</i>	57117-31-4	
<i>2,3,7,8-Tetrachlorodibenzofuran</i>	51207-31-9	

## 2019 Toxic Substance Plans – John Zubick Limited

2,3,7,8-Tetrachlorodibenzo-p- dioxin	1746-01-6	
Octachlorodibenzofuran	39001-02-0	
Octachlorodibenzo-p-dioxin	3268-87-9	
<b>Particulate Matter</b>		
TSP	NA – M08	<p><b>OBJECTIVES:</b> Implement reduction options that consider improved operating practices.</p> <p><b>REDUCTIONS:</b> Dust suppressant was applied to gravel roads in the summer of 2019 No other actions were implemented for reduction in the 2019 reporting year.</p> <p><b>AMENDMENTS:</b> No amendments were made to the toxic reduction plan during the 2019 reporting year.</p> <p><b>COMPARISON TO PLAN:</b> John Zubick Limited continued to implement its road dust management plan. No additional steps were taken during the 2019 reporting year</p>
PM10	NA – M09	
PM2.5	NA-M10	

### Section 5: Exit Record Certification by Highest Ranking Employee

As of July 31, 2020, I, Bruce Zubick certify that I have read the records created for the purposes of section 11.2 of O. Reg. 455/09 (General) made under the Toxics Reductions Act, (2009) in respect of the use and creation of the toxic substance referred to below at the John Zubicks Ltd. facility and am familiar with its contents and to my knowledge they are factually accurate.

- Total particulate matter (CAS# NA-M08)

---

Bruce Zubick  
Vice President  
John Zubick Limited.

## Section 6: Certification by Highest Ranking Employee

As of July 31, 2020, I, Bruce Zubick 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 O. Reg. 455/09 (General) made under that Act.

---

Bruce Zubick  
Vice President  
John Zubick Limited.