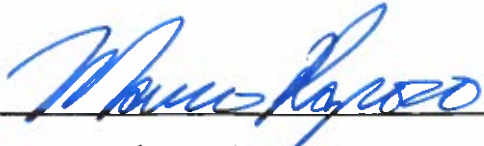


As of June 1, 2019, I, Mario Raposo, certify that I have read the toxic substance reduction plan for VOCs and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.



Director of Operations

June 1, 2019

Date

As of June 1, 2019, I, Wendy Nadan certify that I am familiar with the processes at RRD Toronto that uses VOCs, 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 plan dated November 30, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.



Wendy Nadan, Toxic Substance Reduction Planner

June 1, 2019

Date

National Pollutant Release Inventory (NPRI) and Partners



- Home
- Submission Management
- Help
- My Profile: Wendy Nadan
- Logout
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SWIM > 2018 > Moore Canada Corporation dba RR Donnelley > RR Donnelley - MIL > Report Preview

Report Preview

Report Details

Report Year	2018
Report Type:	NPRI,ON MECP TRA
Report Status:	Submitted
Modified Date/Time:	2019-05-23 10:31 AM

Company and Facility Details

Company Name:	Moore Canada Corporation dba RR Donnelley
Business Number:	120906755
Mailing Address:	Delivery Mode: GeneralDelivery Address Line 1: 6100 Vipond Drive City, Province/Territory, Postal Code: Mississauga Ontario L5T 2X1 Country: Canada
Facility Name:	RR Donnelley - MIL
NAICS Code:	323119
NPRI ID:	5531
Portable:	No
Physical Address:	Address Line 1: 180 Bond Avenue City, Province/Territory, Postal Code: Toronto Ontario M3B 3P3 Country: Canada Latitude: 43.74659 Longitude: -79.34779

Parent Companies

Company Name:	Moore Canada Corporation dba RR Donnelley
Business Number:	120906755
Civic Address:	Address Line 1: 6100 Vipond Drive City, Province/Territory, Postal Code: Mississauga Ontario L5T 2X1 Country: Canada Latitude: 43.74659 Longitude: -79.34779

Contacts Details

Contact Type	Technical Contact, Person who prepared the report
Name:	Karl Deen
Position:	EHSQ Coordinator
Telephone:	4164458800
Extension	2350

Email: karl.deen@rrd.com

Contact Type: Certifying Official, Company Coordinator, Highest Ranking Employee, Public Contact

Name: Mario Raposo

Position: Director of Operations

Telephone: 4164458800

Extension: 2318

Email: mario.m.raposo@rrd.com

Contact Type: Person who coordinated the preparation of the Toxics Reduction Plan

Name: Wendy Nadan

Position: Principal

Telephone: 5199404724

Email: wendy@nadanconsulting.com

Mailing Address: Delivery Mode: SuburbanServices
Address Line 1: 151 Montgomery Boulevard
City, Province/Territory, Postal Code: Orangeville Ontario L9W 5C1
Country: Canada

General Information

Number of employees: 135

Activities for Which the 20,000-Hour Employee Threshold Does Not Apply: None of the above

Activities Relevant to Reporting Dioxins, Furans and Hexachlorobenzene: None of the above

Activities Relevant to Reporting of Polycyclic Aromatic Hydrocarbons (PAHs): Wood preservation using creosote: No

Is this the first time the facility is reporting to the NPRI (under current or past ownership): No

Is the facility controlled by another Canadian company or companies: Yes

Did the facility report under other environmental regulations or permits: No

Is the facility required to report one or more NPRI Part 4 substances (Criteria Air Contaminants): Yes

Was the facility shut down for more than one week during the year: No

Operating Schedule - Days of the Week: Mon, Tue, Wed, Thu, Fri

Usual Number of Operating Hours per day: 24

Usual Daily Start Time (24h) (hh:mm): 00:00

Substance List

CAS RN	Substance Name	Releases	Releases (Speciated VOCs)	Disposals	Recycling	Unit
NA - M16	Volatile Organic Compounds (VOCs)	12.3530	5.0380	N/A	N/A	tonnes

Applicable Programs

CAS RN	Substance Name	NPRI	ON MECP TRA	ON MECP Reg 127/01	First report for this substance to the ON MECP TRA
NA - M16	Volatile Organic Compounds (VOCs)	Yes	Yes		No

TRA Exit Record

CAS RN	Substance Name	Circumstance(s) that apply	Describe the circumstances that lead to the criteria no longer being met	Describe the information and any quantifications relied upon for making the determination
64742-47-8	Hydrotreated light distillate	Facility has permanently ceased to use or create the substance	Facility changed to a new substance	This substance is no longer being used, has been replaced with another substance.

General Information about the Substance - Releases and Transfers of the Substance

CAS RN	Substance Name	Was the substance released on-site	The substance will be reported as the sum of releases to all media (total of 1 tonne or less)	1 tonne or more of a Part 5 Substance (Speciated VOC) was released to air
NA - M16	Volatile Organic Compounds (VOCs)		No	Yes

General Information about the Substance - Disposals and Off-site Transfers for Recycling

CAS RN	Substance Name	Was the substance disposed of (on-site or off-site), or transferred for treatment prior to final disposal	Is the facility required to report on disposals of tailings and waste rock for the selected reporting period	Was the substance transferred off-site for recycling
NA - M16	Volatile Organic Compounds (VOCs)			

General Information about the Substance - Nature of Activities

CAS RN	Substance Name	Manufacture the Substance	Process the Substance	Otherwise Use of the Substance
NA - M16	Volatile Organic Compounds (VOCs)			

TRA Quantifications

CAS RN	Substance Name	Use, Creation, Contained in Product	Quantity	Use ranges for public reporting
NA - M16	Volatile Organic Compounds (VOCs)	Use	25.289 tonnes	No
NA - M16	Volatile Organic Compounds (VOCs)	Creation	0 tonnes	No
NA - M16	Volatile Organic Compounds (VOCs)	Contained in Product		

TRA Quantifications - VOC Breakdown List

CAS RN	Substance Name	Use, Creation, Contained in Product	Quantity
64-17-5	Ethanol	Use	1.096 tonnes
64-17-5	Ethanol	Creation	0 tonnes
64742-95-6	Light aromatic solvent naphtha	Use	1.971 tonnes
64742-95-6	Light aromatic solvent naphtha	Creation	0 tonnes
64742-88-7	Solvent naphtha medium aliphatic	Use	1.971 tonnes
64742-88-7	Solvent naphtha medium aliphatic	Creation	0 tonnes

TRA Quantifications - Total Speciated VOCs

Use, Creation, Contained in Product	Quantity
Use	5.038 tonnes
Creation	0 tonnes

TRA Quantifications - Others

CAS RN	Substance Name	Change in Method of Quantification	Reasons for Change	Description of how the change impact tracking and quantification of the substance	Description of how an incident(s) affected quantifications	Significant Process Change	Reason for the significant process change
NA - M16	Volatile Organic Compounds (VOCs)					No	

On-site Releases - Releases to air

CAS RN	Substance Name	Category	Basis of Estimate	Detail Code	Quantity
NA - M16	Volatile Organic Compounds (VOCs)	Stack or Point Releases	O - Engineering Estimates		0.406 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	Fugitive Releases	O - Engineering Estimates		11.947 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	Other Sources - Speciated VOCs	NA - Not Applicable		12.353 tonnes

On-site Releases - Releases to air - Total

CAS RN	Substance Name	Total - Releases to Air
NA - M16	Volatile Organic Compounds (VOCs)	12.353 tonnes

On-site Releases - Releases to air - VOC Breakdown List

Category	CAS RN	Substance Name	Quantity
Other Sources - Speciated VOCs	64-17-5	Ethanol	1.096 tonnes
Other Sources - Speciated VOCs	64742-95-6	Light aromatic solvent naphtha	1.971 tonnes
Other Sources - Speciated VOCs	64742-88-7	Solvent naphtha medium aliphatic	1.971 tonnes

On-site Releases - Monthly Breakdown of Annual Releases

CAS RN	Substance Name	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
NA - M16	Volatile Organic Compounds (VOCs)	8.33	8.33	8.34	8.33	8.33	8.34	8.33	8.33	8.34	8.33	8.33	8.34

On-site Releases - Reasons for Changes in Quantities Released from Previous Year

CAS RN	Substance Name	Reasons for Changes in Quantities from Previous Year	Comments
NA - M16	Volatile Organic Compounds (VOCs)	Changes in process and/or raw/produced/processed materials Other (specify in comment field)	Retired two pieces of equipment

Comparison Report - Enters, Creation, Contained in Product

CAS RN	Substance Name	Is Breakdown	Category	Quantity	Last Reported Quantity	Reporting Period of Last Reported Quantity	Change	% Change
64-17-5	Ethanol	Yes	Enters the facility (Use)	1.096 tonnes	1.6 tonnes	2017	-0.504	-31.50
64-17-5	Ethanol	Yes	Creation	0 tonnes	0 tonnes	2017	0	

Comparison Report - Enters, Creation, Contained in Product : Reason(s) for Change

CAS RN	Substance Name	Reason(s) for Change	Other Reason
NA - M16	Volatile Organic Compounds (VOCs)	Other	Retired two pieces of equipment, therefore used less.

Comparison Report - On-site Releases

CAS RN	Substance Name	Is Breakdown	Category	Quantity	Last Reported Quantity	Reporting Period of Last Reported Quantity	Change	% Change
64-17-5	Ethanol	Yes	Total Releases to Air	1.096 tonnes	1.6 tonnes	2017	-0.504	-31.50

Comparison Report - On-site Releases - Reason(s) for Change

CAS RN	Substance Name	Reason(s) for Change	Other Reason
NA - M16	Volatile Organic Compounds (VOCs)	Other	Retired two pieces of equipment thereby not using as much.

Pollution Prevention

Does the facility have a documented pollution prevention plan?

Yes

a) Please check all that apply

Plan was prepared or implemented for another government jurisdiction (i.e. other Federal government department, province, municipality). Specify name in comments field below.

b) Did the facility update their plan in the current reporting year?

Yes

c) Does the plan address substances, energy conservation, or water conservation?

Substances (provide the name of the primary Substances in the comments field below)

Please summarize your pollution prevention plan. If you selected "Substances", please specify the substances that were addressed in your plan (this information will be publicly available).

RR Donnelley has prepared a toxic substance reduction plan for VOC's to investigate options to reduce the usage of VOCs while supplying customers with products that meet their needs. The plan was developed in 2013 and we continue to ensure ongoing plan actions are taking place. This includes the monitoring of processes for selection, usage and storage attributes for each solvent. We continue to reduce overall footprint via a blanket wash recycling program with our vendor. We continue to assess print jobs to ensure the most economical production method is used which has a positive impact on solvent use. VOC emissions from our Heatset press are treated with an oxidizer to product local air quality.

Did the facility complete any pollution prevention activities in the current NPRI reporting year

No

Progress on TRA Plan - Objectives

CAS RN	Substance Name	Objectives
64-17-5	Ethanol	RR Donnelley has prepared this toxic substance reduction plan for VOC to investigate options to reduce the usage of VOCs while supplying customers with products that meet their needs. Employees will be trained to use the appropriate solvent for the cleaning task being undertaken, example using the blanket wash material vs meter roller cleaner. Reduction in usage of solvent ethanol (64-17-5) is targeted at

CAS RN	Substance Name	Objectives
		1% by reducing the total use of meter roller cleaner

Progress on TRA Plan - Use Targets

CAS RN	Substance Name	Quantity	Years	Description of Target
64-17-5	Ethanol	13 kg	2	Train all operators to keep containers closed and use minimum solvent for cleaning. This is already standard practice and is not expected to result in any significant reduction in use or emissions. Increase training on the appropriate cleaning solvent for the task to reduce the use of meter roller cleaner.

Progress on TRA Plan - Creation Targets

CAS RN	Substance Name	Quantity	Years	Description of Target
64-17-5	Ethanol	No quantity target	No timeline target	

Progress on TRA Plan - Toxic Reduction Options Implemented

CAS RN	Substance Name	Activity	Steps that were taken in the reporting period to implement the toxic reduction option	Public summary of the description of the steps	Comparison of the steps that were described in the plan for implementation with the actual steps taken during the reporting period	Public summary of the comparison of the steps
64-17-5	Ethanol	Training related to toxics substance reduction	We continue to monitor the use of solvents to ensure best practices. Staff are reminded to store and how to effectively use the solvents, through memos and posters at workstations, classroom training and newsletters. Also containers are replaced as required due to damage or wear.	We continue to monitor the use of solvents to ensure best practices. Staff are reminded to store and how to effectively use the solvents, through memos and posters at workstations, classroom training and newsletters. Also containers are replaced as required due to damage or wear.	Ongoing actions - no changes	Ongoing actions - no changes

CAS RN	Substance Name	Activity	Will the timelines in the current version of the plan will be met	Comments:
64-17-5	Ethanol	Training related to toxics substance reduction	Yes	

Progress on TRA Plan - Reductions due to Options Implemented - Good operator practice or training

CAS RN	Substance Name	Activity	Reductions due to Options Implemented	Quantity
64-17-5	Ethanol	Training related to toxics substance reduction	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64-17-5	Ethanol	Training related to toxics substance reduction	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64-17-5	Ethanol	Training related to toxics substance reduction	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the steps described:	No Amount
64-17-5	Ethanol	Training related to toxics substance reduction	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64-17-5	Ethanol	Training related to toxics substance reduction	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64-17-5	Ethanol	Training related to toxics substance reduction	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to steps described:	No Amount
64-17-5	Ethanol	Training related to toxics substance reduction	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
64-17-5	Ethanol	Training related to toxics substance reduction	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
64-17-5	Ethanol	Training related to toxics substance reduction	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the steps described:	No Amount

Progress on TRA Plan - Additional Actions

CAS RN	Substance Name	Were there any additional actions outside the plan taken during the reporting period to reduce the use and/or creation of the substance?	Describe any additional actions that were taken during the reporting period to achieve the plan's objectives	Provide a public summary of the description of the additional action taken
64-17-5	Ethanol	No		

Progress on TRA Plan - Reductions due to additional actions taken

CAS RN	Substance Name	Reductions due to additional actions taken	Quantity
64-17-5	Ethanol	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions.	
64-17-5	Ethanol	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions.	
64-17-5	Ethanol	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions.	
64-17-5	Ethanol	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the additional actions.	

CAS RN	Substance Name	Reductions due to additional actions taken	Quantity
64-17-5	Ethanol	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the additional actions.	
64-17-5	Ethanol	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions.	
64-17-5	Ethanol	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
64-17-5	Ethanol	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
64-17-5	Ethanol	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions.	

Progress on TRA Plan - Amendments

CAS RN	Substance Name	Were any amendments made to the toxic substance reduction plan during the reporting period	Description any amendments that were made to the toxic substance reduction plan during the reporting period	Provide a public summary of the description of any amendments that were made to the toxic substance reduction plan during the reporting period
64-17-5	Ethanol	No		

Report Submission and Electronic Certification

NPRI - Electronic Statement of Certification

Specify the language of correspondence

English

Comments (optional)

I hereby certify that I have exercised due diligence to ensure that the submitted information is true and complete. The amounts and values for the facility(ies) identified below are accurate, based on reasonable estimates using available data. The data for the facility(ies) that I represent are hereby submitted to the programs identified below using the Single Window Reporting Application.

I also acknowledge that the data will be made public.

Note: Only the person identified as the Certifying Official or the authorized delegate should submit the report(s) identified below.

Company Name

Moore Canada Corporation dba RR Donnelley

Certifying Official (or authorized delegate)

Mario Raposo

Report Submitted by

Karl Deen

I, the Certifying Official or authorized delegate, agree with the statements above and acknowledge that by pressing the "Submit Report(s)" button, I am electronically certifying and submitting the facility report(s) for the identified company to its affiliated programs.

ON MECP TRA - Electronic Certification Statement

Annual Report Certification Statement

As of 2019-05-23, I, Mario Raposo, certify that I have read the reports on the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the information contained in the reports is factually accurate and the reports comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

TRA Substance List*

CAS RN

Substance Name

64-17-5

Ethanol

64742-47-8

Hydrotreated light distillate

64742-95-6

Light aromatic solvent naphtha

64742-88-7

Solvent naphtha medium aliphatic

*Due to reporting system limitations, for the 2018 annual report the TRA Substance List may included new Volatile Organic Compounds (VOCs) and/or Dioxins and Furans congeners reported to NPRI only.

Exit Record Certification Statement

As of 2019-05-23, I Mario Raposo, certify that I have read the records created for the purposes of section 11.2 of Ontario Regulation 455/09 (General) made under the Toxics Reductions Act, (2009) in respect of the use and creation of the toxic substances referred to below at RR Donnelley - MIL and am familiar with their contents and to my knowledge they are factually accurate.

TRA Exit Record Substances

CAS RN

Substance Name

64742-47-8

Hydrotreated light distillate

Company Name

Moore Canada Corporation dba RR Donnelley

Highest Ranking Employee

Mario Raposo

Report Submitted by

Karl Deen

Website address

I, the highest ranking employee, agree with the certification statement(s) above and acknowledge that by checking the box I am electronically signing the statement(s). I also acknowledge that by pressing the 'Submit Report(s)' button I am submitting the facility record(s)/report(s) for the identified facility to the Director under the Toxics Reduction Act, 2009. I also acknowledge that the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 provide the authority to the Director under the Act to make certain information as specified in subsection 27(5) of Ontario Regulation 455/09 available to the public.

Submitted Report

Period	Submission Date	Facility Name	Province	City	Programs
2018	2019-05-23	RR Donnelley - MIL	Ontario	Toronto	NPRI,ON MECP TRA

Note: If there is a change in the contact information for the facility, a change in the owner or operator of the facility, if operations at the facility are terminated, or if information submitted for any previous year was mistaken or inaccurate, please update this information through SWIM or by contacting the National Pollutant Release Inventory directly.

Version: 3.15.0



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