

### CANADIAN ENVIRONMENTAL LAW ASSOCIATION L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT

May 13, 2009

## Remarks to the Standing Committee on General Governance Re: Bill 167 An Act to promote reductions in the use and creation of toxic substances and to amend other Acts

Good afternoon Chairman and Committee Members, thank you for the opportunity to address you on this critical piece of legislation. Bill 167 has the potential to substantially reduce the exposures to harmful toxic substances that Ontario facilities release in record levels to the air and water sheds of North America. In 2006 Ontario facilities reported releases of 879,246,698 kilograms of toxics to all media. Constitutionally Ontario has the right to design its own solutions to address this made in Ontario problem. We see no conflict with federal chemical management programs.

The Canadian Environmental Law Association (CELA), a public interest legal aid clinic with a law reform mandate, has worked since 1970 to reduce toxic use and influence a shift to a precautionary approach toward harmful substances. We congratulate the Premier and all members of Parliament for recognising that this is first and foremost a health issue and we are here to prevent avoidable diseases caused by chronic exposures to these substances in workplaces and the environment. CELA worked closely with the Take Charge of Toxics Coalition and our contribution to their Campaign was the drafting in August 2008 of a Model Toxic Use Reduction Act for Ontario setting out our suggestions for the best model for fast effective action. Our remarks here to day will touch on differences in our Act and Bill 167 and will briefly list matters that need to be included in the Act in the form of amendments, and other components necessary for successful Ontario toxic reduction. Many of the recommendations made by the government's Expert Panel concur with ours. We have provided you with our report Our Toxic-Free Future: an Action Plan and Model Toxics Use Reduction Law for Ontario as well as our other submissions.

The teeth of Bill 167 will lie in its regulations, which are not yet public. Nonetheless, CELA assumes that, with some exceptions, the ultimate shape the Bill 167 regime (Act, regulations, and related programs) will take is as described in the MOE August 2008 *Discussion Paper* and in the April 7, 2009 *Backgrounder* setting out Next Steps and the proposed content of the regulations.

### Matters that should be included in Bill 167 in amendments are:

- 1. **Targets** The legislation should include provincial toxic use reduction targets to set out clear objectives and to measure progress. We recommend 50% within 5 years.
- **2. Fees and Fund** A successful program requires a financial engine. The success of the Massachusetts TUR program has been enhanced by fees on the use of toxic substances. These fees imposed on the regulated community financed the programs and institutions needed to achieve the purpose of their Act. Other efforts in Maine and Oregon that lacked a funding mechanism have not been as successful.
- **3. Substitution of Safer Alternatives** The legislation should include requirements for safer alternatives. This will ensure Ontario industry is competitive and in compliance with European Union regulations.
- 4. **Conflict with Municipal By-laws** Bill 167 is silent on the issue of whether and, if so, how provincial legislation will address potential conflicts with municipal by-laws that might purport to impose greater toxics use reduction or other requirements on industrial facilities than that proposed under the new provincial law. Explicit language should be put in the Act to avoid ambiguity. The CELA model bill provides this language.
- 5. **Establishment of a Toxic Use Reduction Institute** Establishment of an Institute is central to the success of toxic reduction. Training toxic reduction planners, acting as a resource for best practices and for information for the public has led the Toxic Use Reduction Institute in Massachusetts to become the lead global center of excellence in toxic reduction. Creation of such an institution also would help to protect MOE

from a defence of officially induced error in the event of the need to prosecute under the Act, since the actions and advice of the institute would not be that of the MOE.

- 6. **Employee Assistance Programs** Bill 167 is silent on programs needed for employees that could be impacted by this Bill.
- 7. **Technical and Financial Assistance Programs for Small Businesses** Bill 167 is silent on technical and financial assistance programs for small facilities and businesses. Such assistance should be made available even if small businesses are not subject to the requirements of Bill 167.
- 8. **Enhanced Public Participation** Further provisions are needed to provide for adequate public access to information. A public right to apply for review of pollution prevention and substitution plans under the EBR, and a public right of action to enforce provisions of Bill 167.

### Other matters that require improvement in Bill 167

- 1. The purpose of the Bill should include the precautionary principle and substitution of safer substances.
- 2. The Bill needs to cover all sectors that meet the Legislative thresholds.
- 3. The Minister of the Environment should lower thresholds in the Bill to capture small and medium sized facilities and particularly for carcinogens, reproductive toxins and toxins that are bioaccumulative and persistent.
- 4. The application of Bill 167 to consumer products should be clarified in regard to bans, restrictions, labelling and warnings.

In conclusion we urge you to look to our Model Law for ways CELA has outlined to improve Bill 167 and consider the advice of the Minister's Toxic Reduction Scientific Expert Panel. In our September 2008 submission we

### stated:

"Given that Ontario is one of the top dischargers of toxics in North America and the number one discharger in Canada, CELA has some serious reservations about what the provincial proposal is silent or ambiguous about, as well as what appears to be aspects of the initiative that are too narrow, limited, or will be implemented too slowly."

These concerns remain today.

Prepared by CELA Counsel Joe Castrilli and Researchers Sarah Miller and Anne Wordsworth



### STANDING COMMITTEE ON GENERAL GOVERNMENT

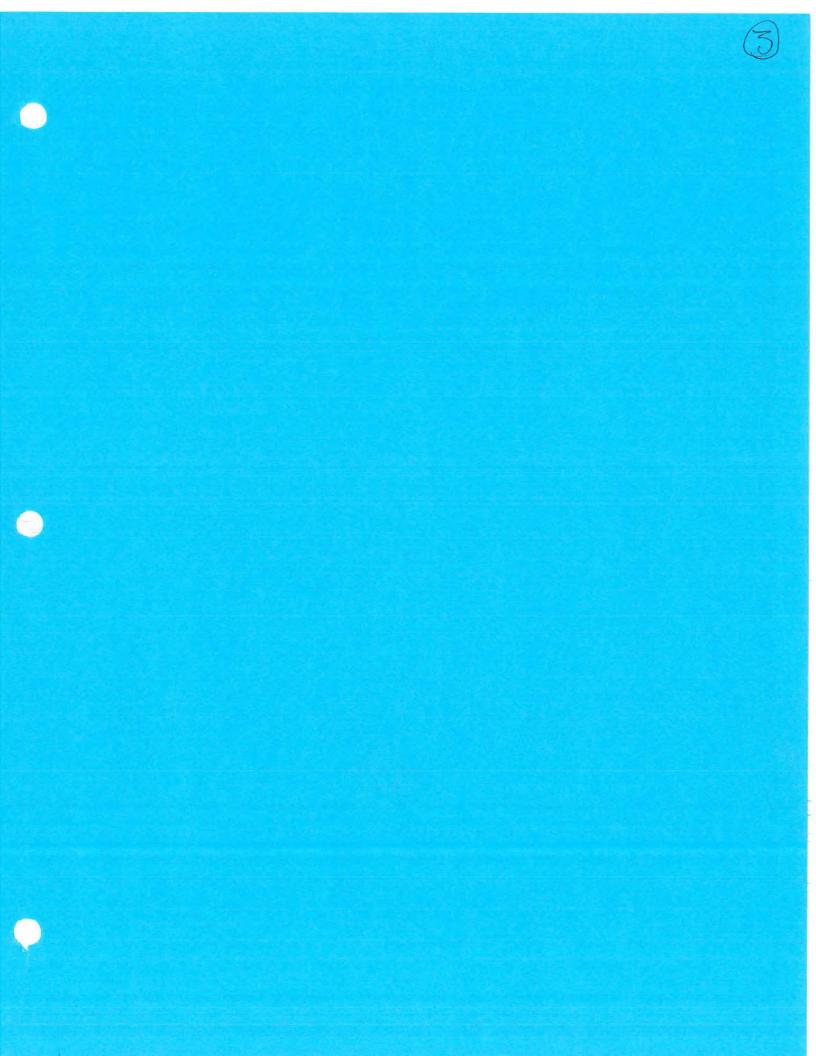
### Wednesday, May 13, 2009

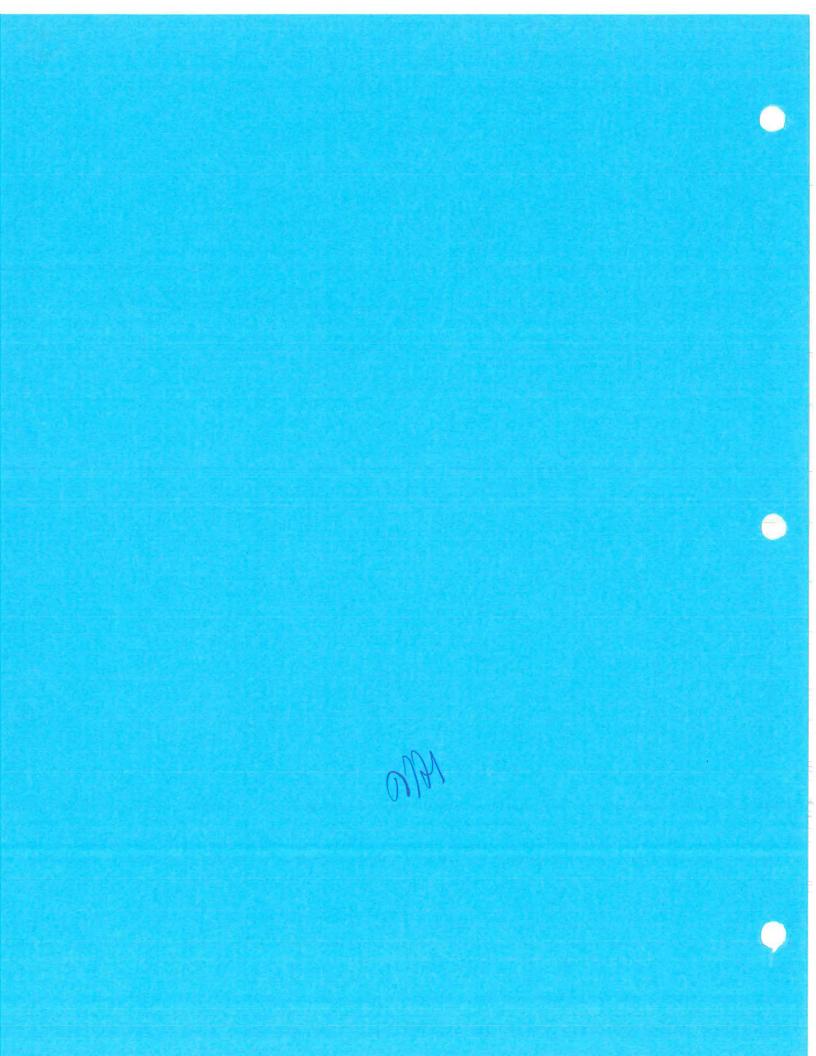
### **Committee Room 228**

### **AGENDA**

### Bill 167, An Act to promote reductions in the use and creation of toxic substances and to amend other Acts

4:00 p.m.	Canadian Cancer Society, Ontario Division Irene Gallagher Jones, Senior Manager, Public Issues
4:15 p.m.	Environmental Defence Janelle Witzel, Toxic Nation Coordinator
4:30 p.m.	Canadian Cosmetic, Toiletry and Fragrance Association Darren Praznik, President and CEO
4:45 p.m.	Sarnia Lampton Environmental Association Dean Edwardson, General Manager
5:00 p.m.	Canadian Environmental Law Association Sarah Miller, Coordinator and Researcher Joseph Castrilli, Counsel
5:15 p.m.	Registered Nurses Association of Ontario Doris Grinspun, Executive Director
5:30 p.m.	Canadian Petroleum Products Institute Eric Bristow, Director, Government Stakeholder Relations for Ontario
5:45 p.m.	Ontario Public Health Association Carol Pimmings, President Helen Doyle, Environmental Specialist Connie Uetrecht, Executive Director







### CANADIAN ENVIRONMENTAL LAW ASSOCIATION L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT

# The Canadian Environmental Protection Act (CEPA), the National Pollutant Release Inventory (NPRI) and Ontario's Bill 167 Toxic Reduction Act ~ Potential Lists of Substances

The Canadian Chemical Producers Association (CPPA) has suggested Ontario should be basing their program on the <u>Canadian Environmental Protection Act</u> (CEPA) and that the Ontario government has no science-based process for adding to the list. Other assertions CCPA has made are:

CEPA is "science based" list of chemicals based on risk. Globally, we are moving away from risk assessment because it does not take into account cumulative and interactive effects. Regulators are looking at hazard and hazardous effects and exposures. The Ontario list represents hazardous chemicals. Risk assessment is an industry strategy that ties people up in knots for years trying to prove something is not good for us. It puts the onus on government and the public to prove the "risk" of hazardous chemicals, while a precautionary approach assumes that we should reduce the quantities of hazardous substances all mixed together in our environment because we can never figure out all of their possible consequences.

NPRI is "emissions-based" not "risk based". That's the point -TRA is about toxics use reduction, and not about estimating risk.
It incorporates a precautionary point of view that less toxics
mean less exposure and less environmental and health risk. It
has been particularly useful in reducing exposures in
workplaces. These have nothing to do with emissions and

everything to do with health. The Government's Expert Panel which included experts on CEPA and NPRI endorsed taking a hazard approach.

NPRI substances are not toxic - they have not had an assessment to see if they pose a risk. All NPRI substances were chosen based on their polluting or toxic effects. That's why the US equivalent is called the Toxics Release Inventory. Just because they haven't been assessed for risk doesn't mean they aren't toxic. Some are toxic and some are air and water pollutants with health and environmental effects. All are considered problematic and good targets for reduction.

Using NPRI would cause duplication and cost more money. The opposite is true. Using NPRI avoids duplication because industry already reports under this program and is consistent with the model used in the states of New Jersey and Massachusetts and in Eugene, Oregon. All base their reporting and toxics use reduction efforts on TRI which is the American counterpart to NPRI. It allows us to see whether there are any reductions being made because we have a history of reporting.

Furthermore we support the Ontario approach to their list because:

- The CEPA list is not the Ontario list that would be required for a made-in-Ontario plan to address specific substances in use in the Province. Ontario has the constitutional authority to design its own list to address problems created within its borders.
- Here is a link to what has currently been put on the CEPA list.

http://www.ec.gc.ca/ceparegistry/subs list/Toxicupdate.cfm
. This list currently covers only **85** substances. Many of these are not individual toxic chemicals but conglomerations in emissions. Bill 167, if it maintains the schedule set out in the Government Discussion Paper, will eventually cover **475** substances.

- The CEPA list does not cover or stress many of the carcinogens that our July 2007 report Cancer and the Environment in Ontario: GAP Analysis on the Reduction of Carcinogens. This report identified 202 carcinogens of concern in use and largely unregulated in Ontario. All three parties promised to act on this Report before the last election.
- The Government Discussion Paper set out to include these carcinogens in order to meet the original objective of Toxic Use Reduction announced by Premier McGuinty which was "to reduce the environmental causes of sickness in Ontario"
- Furthermore the Government Discussion paper and their Expert Panel has targeted other substances that are known to be neurotoxins, reproductive toxins and mutagens that are not currently reported under NPRI to eventually be covered by TRA.
- The CEPA program does not require pollution prevention planning on a facility by facility basis as the TRA does.

 CPPA members already report to NPRI and so Ontario's scheme first sets out to include all NPRI substances in the first 2 phases of their reporting. The only difference is that they will now have to report on use as well as emissions. Industry at the Hamilton Consultation on the Government Discussion Paper stated that they already track use data in order to arrive at the emissions data they currently report to NPRI.

Prepared by CELA Researchers Sarah Miller and Anne Wordsworth May 13, 2009

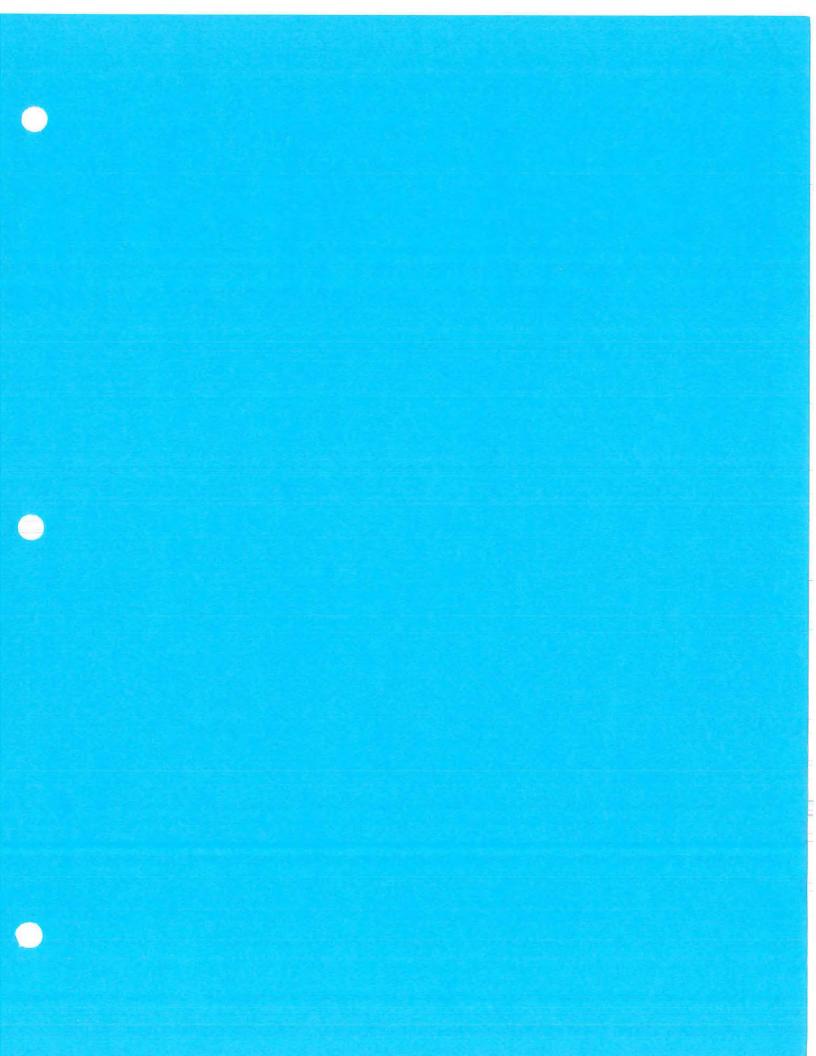
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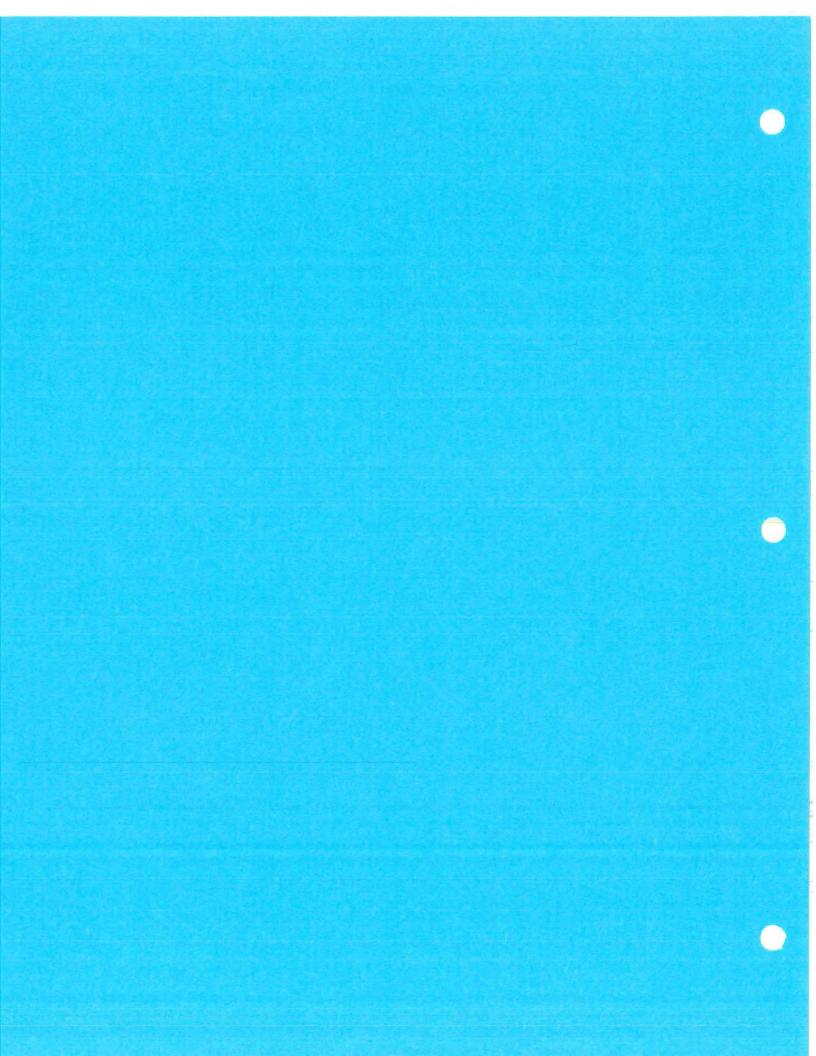
### STANDING COMMITTEE ON GENERAL GOVERNMENT

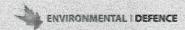
#### REPORT OF THE SUB-COMMITTEE

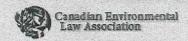
Your Sub-committee met on Wednesday, May 6, 2009, to consider the method of proceeding on Bill 167, An Act to promote reductions in the use and creation of toxic substances and to amend other Acts, and recommends the following:

- 1. That the Committee meet in Toronto on Wednesday, May 13, 2009, and Monday, May 25, 2009, for the purpose of holding public hearings.
- 2. That the Committee Clerk, with the authorization of the Chair, post information regarding public hearings in the Ontario Edition of the Globe & Mail, the Toronto Star, and the Sarnia Observer for one day during the week of May 11, 2009.
- 3. That the Committee Clerk, with the authorization of the Chair, post information regarding public hearings on the Ontario Parliamentary channel and the Legislative Assembly website.
- 4. That interested parties who wish to be considered to make an oral presentation contact the Committee Clerk by 12:00 noon on Thursday, May 14, 2009.
- 5. That groups and individuals be offered 10 minutes for their presentation. This time is to be scheduled in 15 minutes increments to allow for questions from the Committee.
- 6. That witnesses be scheduled on a first come first serves basis for the May 13, 2009 hearing date.
- 7. That, in the event all remaining witnesses cannot be scheduled for the May 25, 2009 hearing date, the Committee Clerk provide the members of the Sub-committee with a list of requests to appear.
- 8. That the members of the Sub-committee prioritize and return the list of requests to appear by 12:00 noon on Tuesday, May 19, 2009, and that the Committee Clerk schedule witnesses based on those prioritized lists.
- 9. That the deadline for written submissions be 5:00 p.m. on Monday, May 25, 2009.
- 10. That the Research Officer provide the Committee with a summary of presentations.
- 11. That, for administrative purposes, proposed amendments be filed with the Committee Clerk by 12:00 noon on Thursday, May 28, 2009.
- 12. That the Committee meet for the purpose of clause-by-clause consideration of the Bill on Monday, June 1, 2009, and that each Party be offered an opportunity to make opening remarks.
- 13. That the Committee Clerk, in consultation with the Chair, be authorized prior to the adoption of the Report of the Sub-committee to commence making any preliminary arrangements necessary to facilitate the Committee's proceedings.











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Ontario

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Total Reported Releases On- and Off-site - Toxics Only for Ontario in 2006 are 135,576,703 (kg)

National Ranking for Total Reported Releases On- and Off-site - Toxics Only for ON in 2006 is

To see other pollution reports, please go to Pollution Ranking.

#### Please note:

- The units of measurement for data presented below are in **kilograms (kg)**, excluding hexachlorobenzene which is measured in **grams (g)** and dioxins/furans which are measured in **grams (g)** TEQ.
- Recycling data is not included in total releases or transfers data. To obtain recycling data, please go to Who is Polluting? or Pollution Rankings.

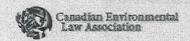
Breakdown by Pollutants:

(NOTE: Click on the column total number for a detailed look at the data.)

Pollutant *	Air Release	Water Release	Land Release (on & off-site)	Underground Injection (on & off-site)	Total Release	Adjusted Total Release	Percentage*
<b>Combined Total</b>	781,002,155	54,786,431	39,060,255	4,303,571	879,246,698	875,704,954	
<b>Toxics Total</b>	37,332,160	54,786,431	39,060,255	4,303,571	135,576,703	132,034,960	

Nitrate ion in solution at pH >= 6.0	1,853	34,053,076	15,280	420,915	34,491,141	34,491,141	3.92%
Ammonia (Total)	6,243,271	18,636,165	1,632,792	14,070	26,527,443	26,527,443	3.02%
Sulphuric acid	5,388,238	0	1,297,234	3,656,555	10,346,042	10,346,042	1.18%
Asbestos (friable form)	0	0	9,213,345	0	9,213,345	8,440,515	1.05%
Zinc (and its compounds)	219,388	68,961	8,749,092	0	9,041,108	7,045,958	1.03%
Phosphorus (total)	37,769	1,378,707	5,644,637	2,314	7,065,443	7,065,203	.80%
Manganese (and its compounds)	40,568	158,640	3,474,733	0	3,679,957	3,281,337	.42%
Hydrochloric acid	3,229,605	1,362	47,466	0	3,279,832	3,279,832	.37%
Xylene (all isomers)	2,782,159	73	424,754	8	3,213,420	3,213,420	.37%
Methanol	2,861,287	80,085	152,651	0	3,101,876	3,101,876	.35%
Toluene	2,293,329	631	271,897	6	2,572,845	2,572,845	.29%
Lead (and its compounds)	93,935	8,097	2,209,482	167	2,311,680	2,124,197	.26%
Methyl ethyl ketone	1,842,937	8	102,894	0	1,949,787	1,949,787	.22%
Isopropyl alcohol	1,383,954	0	9,536	0	1,398,938	1,398,938	.16%
Copper (and its compounds)	192,770	27,554	930,407	13,586	1,167,555	1,088,452	.13%
n-Hexane	1,137,521	19	182	24	1,140,459	1,140,459	.13%
Ethylene glycol	12,259	57,140	1,055,227	0	1,126,927	1,126,927	.13%
Aluminum (fume or dust)	344,159	8,929	748,633	0	1,103,057	1,103,057	.13%
Calcium fluoride	6,799	48,004	760,313	0	815,746	815,746	.09%
Chromium (and its compounds)	7,606	13,342	660,302	53,143	737,654	639,974	.08%
2-Butoxyethanol	673,943	2,374	1,843	0	680,949	680,949	.08%
Formaldehyde	660,370	1,498	15,321	0	678,024	678,024	.08%
Hydrogen sulphide	636,005	2,049	2,653	0	641,296	641,296	.07%
n-Butyl alcohol	591,960	0	960	0	594,641	594,641	.07%
Aluminum oxide (fibrous forms)	722	0	532,415	0	533,536	533,536	.06%
Ethylbenzene	481,640	17	47,649	0	529,994	529,994	.06%
Cyclohexane	513,544	157	0	0	513,817	513,817	.06%
Trichloroethylene	504,476	0	1,430	0	506,135	506,135	.06%
Ethylene	488,277	0	0	0	488,277	488,277	.06%
1,2,4-Trimethylbenzene	461,509	0	98	0	462,744	462,744	.05%
Styrene	394,620	0	16,701	0	412,603	412,603	.05%
Hydrogen fluoride	383,699	0	0	0	383,777	383,777	.04%
Naphthalene	54,172	0	321,639	0	375,819	375,819	.04%
Propylene	361,811	0	5,222	0	367,698	367,698	.04%
Nickel (and its compounds)	123,431	13,707	174,722	11,971	326,776	325,526	.04%







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### Air Releases of Carcinogens by Province

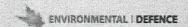
Rank	Provinces	Air Releases of Toxics of Carcinogens (kg)	Percentage
1	Ontario	2,736,369 4; (09)	38. 18 %
2	Alberta	1,283,727	17. 91 %
3	Quebec	1,261,851	17. 61 %
4	British Columbia	797,639	11. 13 %
5	New Brunswick	392,403	5. 47 %
6	Manitoba	369,686	5. 16 %
7	Saskatchewan	115,839	1. 62 %
8	Nova Scotia	97,280	1. 36 %
9	Newfoundland	65,029	. 91 %
10	Northwest Territories	29,103	. 41 %
11	Prince Edward Island	18,325	. 26 %

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Rank	Provinces	Total Reported Releases On- and Off-site - Toxics Only (kg)	Percentage
1	British Columbia	386,658,218	42.47%
2	Alberta	268,313,791	29.47%
3	Ontario	135,576,703	14.89%
4	Quebec	59,634,152	6.55%
5	Nunavut	18,695,703	2.05%
6	Manitoba	12,563,645	1.38%
7	Saskatchewan	10,436,324	1.15%
8	New Brunswick	8,054,733	.88%
9	Nova Scotia	6,375,691	.70%
10	Newfoundland	3,268,456	.36%
11	Prince Edward Island	559,654	.06%
12	Northwest Territories	227,487	.02%



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Benzene	317,123	212	146	2	317,498	317,498	.04%
Methyl isobutyl ketone	272,826	0	35,858	0	311,013	311,013	.04%
Chlorine	99,087	165,952	0	0	266,205	266,205	.03%
Carbon disulphide	249,296	0	0	0	249,296	249,296	.03%
Acetaldehyde	217,958	1,811	6	0	219,775	219,775	.02%
Chloromethane	199,000	0	0	0	199,000	199,000	.02%
N-Methyl-2-pyrrolidone	197,401	0	1,368	0	198,814	198,814	.02%
Phenol (and its salts)	156,448	271	11,024	0	168,468	168,468	.02%
Vanadium (except when in an alloy) and its compounds	77,047	176	78,014	0	155,311	155,311	.02%
Arsenic (and its compounds)	31,144	3,739	114,467	0	149,349	145,333	.02%
i-Butyl alcohol	136,632	0	776	0	138,776	138,776	.02%
Cadmium (and its compounds)	6,539	1,209	120,775	0	128,522	123,945	.01%
Nitric acid	18,177	30	591	92,190	112,605	112,605	.01%
Dichloromethane	102,141	0	48	0	103,557	103,557	.01%
Acrolein	101,457	0	0	0	101,457	101,457	.01%
HCFC-142b	75,773	0	0	0	75,783	75,783	
Formic acid	65,809	0	0	0	65,819	65,819	
Hexavalent chromium compounds	979	248	23,460	38,620	63,308	63,308	
Chlorine dioxide	58,923	0	0	0	58,923	58,923	
Methylenebis (phenylisocyanate)	1,932	0	55,243	0	57,579	57,579	
Nonylphenol and its ethoxylates	19,340	35,735	379	0	55,769	55,769	-
Selenium (and its compounds)	30,180	2,441	15,472	0	48,094	48,094	
Sulphur hexafluoride	47,382	0	0	0	47,382	47,382	
1,3-Butadiene	42,526	0	0	0	42,571	42,571	
Triethylamine	38,238	2,200	0	0	40,439	40,439	
Sodium nitrite	25,408	0	3,516	0	28,924	28,924	
tert-Butyl alcohol	25,843	940	0	0	26,783	26,783	
Diethanolamine (and its salts)	23,808	0	92	0	24,087	24,087	
Cobalt (and its compounds)	4,086	283	15,784	0	20,272	20,272	
HCFC-141b	19,711	0	0	. 0	19,732	19,732	
<u>Acetonitrile</u>	18,994	0	0	0	19,174	19,174	
Carbonyl sulphide	18,678	0	0	0	18,678	18,678	
Hydrogen cyanide	18,606	0	0	0	18,676	18,676	-

CFC-22	18,148	0	0	•	10.010	10.010	
	10,140	U	0	0	18,313	18,313	
s(2-ethylhexyl) phthalate	217	0	17,258	0	17,908	17,908	
ethyl methacrylate	17,174	0	247	0	17,813	17,813	
oprene	14,863	0	0	0	14,863	14,863	
hylene oxide	12,325	0	0	0	13,079	13,079	
p'-Methylenebis(2- ıloroaniline)	11,758	0	0	0	11,758	11,758	
ntimony (and its ompounds)	161	7	11,201	0	11,684	11,264	
etrachloroethylene	10,512	2	560	0	11,310	11,310	
aleic anhydride	7,433	0	0	0	8,352	8,352	
ec-Butyl alcohol	7,708	0	0	0	7,708	7,708	
CFC-123 and all isomers	843	5,951	0	0		6,794	
ecabromodiphenyl oxide	48	0	5,883	0	5,931	5,931	
olymeric diphenylmethane isocyanate	306	0	5,330	0	5,709	5,709	
resol (mixed isomers and eir salts)	5,534	0	31	0	5,566	5,566	
utyl benzyl phthalate	387	0	4,846	0	5,340	5,340	
inyl chloride	5,132	1	152	0	5,285	5,285	
inyl acetate	4,414	0	0	0	4,745	4,745	
henanthrene	3,109	3	1,218	0	4,330	4,330	
ethyl tert-butyl ether	4,259	0	0	0	4,259	4,259	
yanides (ionic)	1,732	1,489	0	0	3,936	3,936	
enzyl chloride	0	0	3,870	0	3,871	3,871	
crylonitrile	3,334	0	0	0	3,337	3,337	
ercury (and its compounds)	853	102	2,374	0	3,329	2,954	
iphenyl	3,239	2	0	0	3,249	3,249	
icyclopentadiene	3,092	0	0	0	3,103	3,103	
horium dioxide	104	0	2,813	0	2,917	2,917	
,N-Dimethylformamide	2,738	0	0	0	2,738	2,738	
6-Di-t-butyl-4-methylphenol	2,095	0	399	0	2,498	2,498	
umene	1,496	0	9	0	2,322	2,322	
ydrazine (and its salts)	119	1,865	0	0	1,985	1,985	
A TENEDOUS IN CONTRACTOR OF THE STATE OF THE	1,670	0	235	0	1,906	1,906	
	1,835	0	4	0	1,851	1,851	
luoranthene		. 1	704	0	1,796	1,796	
		0	0	0	1,758	1,758	
			0	0			
	ethyl methacrylate oprene hylene oxide o'-Methylenebis(2- loroaniline) ntimony (and its impounds) etrachloroethylene aleic anhydride ic-Butyl alcohol CFC-123 and all isomers ecabromodiphenyl oxide olymeric diphenylmethane isocyanate resol (mixed isomers and eir salts) utyl benzyl phthalate nyl chloride nyl acetate nenanthrene ethyl tert-butyl ether yanides (ionic) enzyl chloride crylonitrile ercury (and its compounds) phenyl icyclopentadiene norium dioxide iN-Dimethylformamide 6-Di-t-butyl-4-methylphenol umene ydrazine (and its salts) cenaphthene is(2-ethylhexyl) adipate	ethyl methacrylate prene 14,863 hylene oxide 12,325 po'-Methylenebis(2-loroaniline) 11,758 prene 10,512 prene 10,513 prene 10,534 prene	17,174	Detrival methacrylate   17,174   0   247   247   248	Detry   methacry   m	Section   Sect	Sethyl methacrylate   17,174   0   247   0   17,813   1

2-Ethoxyethyl acetate	1,394	0	0	0	1,394	1,394	
Pyrene	596	4	730	0	1,329	1,329	
Acenaphthylene	639	0	682	0	1,320	1,320	
Diphenylamine	1,267	0	0	0	1,277	1,277	
<u>Hexachlorobenzene</u>	904,998.0000	113,561.0000	82,048.0000	.0000	1,100,607.0000	1,100,607.0000	
HCFC-124 and all isomers	0	1,000	0	0	1,039	1,039	
Dimethyl phenol	867	0	0	0	867	867	
1,2,4-Trichlorobenzene	856	0	0	0	856	856	
Dibutyl phthalate	0	0	0	0	755	755	
Fluorene	172	0	555	0	727	727	
Toluenediisocyanate (mixed isomers)	501	0	0	0	634	634	· <del></del>
Anthracene	354	0	259	0	613	613	
Dibenzo(a,i)pyrene	611	0	0	0	611	611	
Toluene-2,4-diisocyanate	3	0	593	0	598	598	-
2-Mercaptobenzothiazole	0	0	0	0	562	562	
Silver (and its compounds)	506	25	10	0	552	552	
1,4-Dioxane	543	0	0	0	543	543	
Benzo(a)phenanthrene	310	2	199	0	511	511	
Octylphenol and its ethoxylates	332	0	0	0	503	503	
Benzo(a)anthracene	191	1	285	0	477	477	
PAHs, total Schedule 1, Part 2	382	5	68	0	456	456	
Benzo(a)pyrene	161	3	290	0	454	454	
Ethyl acrylate	46	0	0	0	450	450	
Quinoline (and its salts)	426	0	0	0	426	426	
Butyl acrylate	289	0	0	0	424	424	
Phthalic anhydride	214	0	0	0	325	325	
Benzo(b)fluoranthene	151	1	137	0	289	289	
Cyclohexanol	17	0	0	0	273	273	
Toluene-2,6-diisocyanate	0	0	198	0	198	198	
Benzo(k)fluoranthene	81	1	108	0	190	190	
Phosphorus (yellow or white)	140	0	50	0	190	190	
Acrylic acid (and its salts)	110	0	33	0	185	185	
p,p'-Isopropylidenediphenol	159	0	0	0	159	159	-
Nitrilotriacetic acid (and its salts)	0	0	0	0	137	137	<u>.</u>
Iron pentacarbonyl	129	0	0	0	129	129	

Dibenzo(a,h)anthracene	105	0	13	0	118	118	
Benzo(g,h,i)perylene	48	0	60	0	108	108	
Dimethyl phthalate	100	0	0	0	100	100	
Benzo(j)fluoranthene	23	0	73	0	97	97	
Fluorine	93	0	0	0	93	93	
Chlorobenzene	0	0	90	0	92	92	
Di-n-octyl phthalate	84	0	0	0	84	84	
Methyl acrylate	0	0	0	0	81	81	
Indeno(1,2,3-c,d)pyrene	61	0	19	0	80	80	
Bromine	0	0	0	0	79	79	
Benzo(e)pyrene	51	0	17	0	68	68	
Acrylamide	0	0	36	0	66	66	
Perylene	38	0	3	0	41	41	
Propylene oxide	40	0	0	0	40	40	
Lithium carbonate	29	0	0	0	31	31	-
Chloroform	1	0	0	0	24	24	
CFC-11	0	0	0	0	19	19	
Diethyl phthalate	0	0	0	0	12	12	
Catechol	0	5	0	0	5	5	
1,2-Dichloroethane	1	4	0	0	5	5	
7H-Dibenzo(c,g)carbazole	1	0	3	0	4	4	
Hydroquinone (and its salts)	0	0	0	0	2	2	
C.I. Basic Green 4	0	0	0	0	1	·1	
Dibenz(a,j)acridine	1	0	0	0	1	1	
Carbon tetrachloride	1	0	0	0	1	1	-
1,1-Methylenebis(4- isocyanatocyclohexane)	0	0	0	0	1	1	
Bromomethane	1	0	0	0	1	1	
Isophorone diisocyanate	0	0	0	0	1	1	
C.I. Food Red 15	0	0	0	0	. 1	1	
Dioxins and furans	10.5626	.0100	35.5180	.0000	46.0906	46.0906	
CACs Total	811,277,922	0	0	0	811,277,922	811,277,922	
Sulphur dioxide	431,545,116	0	0	0	431,545,116	431,545,116	49.08%
Carbon monoxide	157,025,753	0	0	0	157,025,753	157,025,753	17.86%
Oxides of nitrogen	113,528,576	0	0	0	113,528,576	113,528,576	12.91%
Volatile Organic Compounds (VOCs)	67,607,928	0	0	0	67,607,928	67,607,928	

PM - Total Particulate Matter	41,570,550	0	0	0	41,570,550	41,570,550	4.73%
PM10 - Particulate Matter <=is 10 Microns	27,926,397	0	0	0	27,926,397	27,926,397	-
PM2.5 - Particulate Matter <= 2.5 Microns	17,012,396	0	0	0	17,012,396	17,012,396	

<sup>\*</sup> Click on pollutant's name to see its health effect on external site

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