

# CHEMTRAC Paper product manufacturing

ChemTRAC requires businesses in Toronto to report their use and release of 25 chemicals covered under a bylaw (Environmental Reporting and Disclosure Bylaw, Municipal Code 423).

Paper product manufacturing facilities are covered under this bylaw, which means that you, as the owner or operator, are required to report your use and release of any of the toxic chemicals listed in the bylaw. For this type of facilities, some common chemicals you need to report are:

- Volatile Organic Compounds (VOCs) Sources: deinking, cleaning solvents, natural gas fired boilers/dryers
- Particulate matter (PM<sub>2.5</sub>) Sources: sanding, natural gas fired boilers/dryers
- Nitrogen oxides (NOx) Sources: natural gas fired boilers/dryers

To report you need to:

- Identify the substances you use and release in your facility.
- Calculate your use and release of the substances. To help you with the calculations you can use the free, online calculators<sup>1</sup>, including dust collector, natural gas boilers, VOC calculators at [toronto.ca/chemtrac](http://toronto.ca/chemtrac) (under related links).
- Report all the priority substances that meet or exceed the reporting thresholds<sup>2</sup>. The priority substances are divided into three groups, A, B and C. The reporting thresholds for each of these groups are different. You meet or exceed the reporting threshold of:
  - Group A** amount manufactured, processed or otherwise used  
e.g. acetaldehyde, chloroform
  - Group B** amount released, disposed and/or transferred
  - Group C** amount that is released  
e.g. VOCs, NOx, PM<sub>2.5</sub>
- Report **both use and release amounts** of all priority substances that meet or exceed the reporting threshold.
- Several Group A substances are VOCs. Be sure to report them **separately and as a total**, along with any other VOCs you released, in your VOC estimation.
- Report your information by June 30 each year. Go to [toronto.ca/chemtrac](http://toronto.ca/chemtrac) to submit your report.

*It is your responsibility to determine if you have to report.*

If you have questions or need help, email [chemtrac@toronto.ca](mailto:chemtrac@toronto.ca) or call 416-338-7600.

---

<sup>1</sup> Check every year to make sure you are using the latest version of our calculators

<sup>2</sup> For threshold information see Schedule A of the bylaw or the "What Businesses and Facilities Need to Know" fact sheet included in this package



## A note about natural gas

When you burn natural gas you produce nitrogen oxides (NO<sub>x</sub>). If you burn more than 125,000 m<sup>3</sup> of natural gas for process heating (e.g. boilers, dryers) you may need to report your use and release of NO<sub>x</sub>. Do not include gas that is used for facility (i.e. comfort) heating. If natural gas is used for both facility and process heating you can use your gas bill from the summer months and then average your use to determine your annual use related to processes. Then go to the Power Generation webpage at [toronto.ca/chemtrac](http://toronto.ca/chemtrac) for an online calculator for your heating type.

## Bylaw Compliance

Paper product manufacturing facilities are covered under the bylaw (Municipal Code Chapter 423, Environmental Reporting and Disclosure).

**When you meet or exceed reporting thresholds** for any substance listed in the bylaw to comply you need to:

- For each year, keep track of the amount of:
  - natural gas used by boilers/dryers
  - solvents used for deinking
  - solvents used for cleaning
- Calculate the amount of substances you use and release based on your records. If you need help with these calculations visit [toronto.ca/chemtrac](http://toronto.ca/chemtrac) or contact us.
- Report the information every year by June 30<sup>th</sup>.
- Store the information and calculations. You will need to provide it if you are selected for an audit.

**When you are below reporting thresholds** for all substances listed in the bylaw to comply you need to:

- Store the information of your, manufacture, use, and release of the substances listed in the bylaw, along with your gas bill (for process heating). If you are selected for an audit you will need to provide it.

Please note you can be given a warning, ticket or summons to court if you do not:

- Report your data when you meet the reporting thresholds for any substance listed in the bylaw
- Report by June 30<sup>th</sup>
- Report data accurately
- Keep the information, your calculations are based on, for five years

Each violation of the bylaw can have a maximum penalty of \$5,000 upon summary conviction for the first offence.

## Audits

We check all reports submitted to ChemTRAC to make sure the data is accurate and complete. Every year we also randomly select some businesses to audit. An audit helps make sure businesses are complying with the bylaw and to make sure the data reported is accurate.

If you receive a Notice of Audit:

- Reply to the contact person listed in the notice within **two weeks** of getting the notice.
- Be prepared to provide all the sources of information used for the calculations, how you calculated the use and release amounts and if you reported, the confirmation of the submitted reports.