

Pollution Prevention (P2) Plan Due Dates Are Fast Approaching

Industries and business operating in the City of Toronto must meet the requirements of the new City of Toronto By-law No. 457-2000. All sectors are required to develop a Pollution Prevention (P2) Plan and Summary Plan. As with other requirements in the Sewer Use By-law, failure to comply can lead to enforcement action including unnecessary fines and charges. According to Section 13(3) of the By-Law, a contravention of the pollution prevention planning requirements can result in a fine of up to \$5,000 for every day of the offence.

The City of Toronto is one of the first municipalities in Canada to incorporate pollution prevention planning requirements into the Sewer Use By-law. It is expected that additional municipalities in the province will soon implement P2 reporting as part of efforts to reduce toxic effluent loading to their treatment plants.

Background

Toronto By-law No. 457-2000 *To regulate the discharge of sewage and land drainage*, was passed by City Council on July 6, 2000. In comparison to the previous Sewer Use By-law, the new By-law has a more comprehensive list of subject pollutants for sanitary and combined sewer discharges. The list of contaminants was expanded to include the addition of 11 metals and 27 organic compounds. In addition to the newly included subject pollutants, the By-law requires the development of a Pollution Prevention (P2) Plan and

P2 Plan Summary for subject sector industries and industries which discharge any amount of a subject pollutant.

Subject Pollutants

Subject pollutants, as defined by the By-Law shown below.

Arsenic
Benzene
Cadmium
Chloroform
Cobalt
1,2-dichlorobenzene
Chromium
1,4-dichlorobenzene
Copper
Cis-1,2-dichloroethylene
Mercury
Trans-1,3-dichloropropylene
Molybdenum Ethyl benzene
Nickel
Methylene chloride
Lead
1,1,2,2-tetrachloroethane
Selenium
Tetrachloroethylene
Zinc Toluene
Trichloroethylene
Total xylene
Di-n-butyl phthalate
Bis (2-ethylhexyl) phthalate
Alkylphenols Alkylphenol ethoxylates
Aldrin/dieldrin
Chlordane
DDT
Hexachlorobenzene
Mirex
PCBs
3,3'-dichlorobenzidine
Hexachlorocyclohexane
Pentachlorophenol
Total PAHs

HIGHLIGHTS

- ◆ part of effort to reduce toxic effluent loading to sewage treatment plants
- ◆ fines of up to \$5,000 per day
- ◆ source reduction the priority

The Pollution Prevention Plan

The City of Toronto defines pollution prevention as *the maximum feasible reduction, preferably elimination, of all toxic wastes and the wastes listed as subject pollutants generated at production, usage, or storage sites.*

Prior to initiating a P2 plan, a 'pre-plan' assessment of the industry or business is essential to determine whether subject pollutants are present. The assessment typically includes effluent sampling of the sanitary sewers, on-site review of relevant documentation (i.e. MSDS, waste manifests, etc.), review of business operations and examination of waste streams.

Where a subject pollutant is identified, a P2 Plan and Summary is required. The key elements for developing a P2 plan and reducing

subject pollutants are:

- **Establish the Pollution Prevention Program**
- **Organize the Pollution Prevention Plan**
- **Preliminary Assessment - Material Balance**
- **Define the Pollution Prevention Options**
- **Complete a Feasibility Analysis**
- **Prepare the Plan**
- **Complete the P2 Plan Summary Report**
- **Submit Plan summary**

The priority of the plan is source reduction of the subject pollutant. It is important to note that a reduction or elimination of toxic materials may have other benefits for the business, including reduced operating costs, reduced liability and an enhanced company image.

Industry Sector Due Dates

Due dates for preparation of P2 Plans and submission of a plan summary are set out in the By-Law.

P2 Plans must be revised at least every six years and each facility is expected to complete a Plan Summary two years after submission of the original P2 Plan. In the event that an industry or business is not listed in Appendix 1, a P2 plan must be completed by June 1, 2001.

Due dates are based on subject sector industries and businesses as shown in Table 1.

Information regarding Toronto By-law No. 457-2000 and pollution prevention can be obtained from the City of Toronto website at <http://www.city.toronto.on.ca/involved/wpc/nbylaw.htm> or contact: Ross Borthwick, Senior Hydrogeologist Environmental Management Services Pinchin Environmental Ltd. 905-712-6453

Table 1. Industry Sector Due dates*

Subject Sector*	P2 Plan Due Dates
<ul style="list-style-type: none"> • Metals (treating, smelting, fabrication, electroplating, etc.) • Mining • Household Furniture • Electronic 	June 30, 2001
<ul style="list-style-type: none"> • Automotive (repair, fueling, etc.) • Photofinishing • Medical (dentists, hospitals, laboratories, etc.) • Dry Cleaning • Transportation (rail, air, bus etc.) • Printing and Printing Manufacturing 	December 31, 2001
<ul style="list-style-type: none"> • Manufacturing (chemical, plastics, petrochemical, leather, plastics, etc.) • Petroleum Refineries 	June 30, 2002

*summarized from Appendix 1 Chapter 681, Article I, 457-200 for information only. Please refer to the Toronto By-Law for the complete list of subject sectors.

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