

**Proposed City of Toronto**  
**Environmental Reporting and Disclosure Program**  
**January 7, 2008**

- The City of Toronto Board of Health has asked Toronto Public Health to explore what an environmental reporting and disclosure program could look like and present it to the Board and City Council for review (draft to be presented in spring 2008);
- The intent of the program is to:
  - target 25 contaminants that are present in Toronto's air at levels that may pose a health risk (see Table 1);
  - capture small to medium-sized industries (that are not captured by other reporting programs such as the NPRI);
  - encourage businesses to become more aware of their use and release of these chemicals and begin environmental programs (pollution prevention); and
  - assist the public in obtaining access to the information that is collected;
- Basically a similar mandatory annual reporting program (a bylaw) to NPRI but with lower reporting thresholds;
- Future reporting may require reporting of GHGs (CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O) but currently not included;
- Focus on stationary sources (not vehicles or other mobile sources);
- Certain types of businesses (sectors) and sources of chemicals would be exempted (see Table 2);
- Except for by-products, reporting based on use thresholds (MPO) such that if a facility uses a chemical at a quantity above the reporting threshold, it must report even if its air (fugitive and direct), surface water (spills and discharges) and land (spills and on-site disposal) releases are less than the threshold or are zero;
- However, releases do not include off-site disposal or recycling (i.e., transfers) as with NPRI;
- For by-products, the releases must equal or be greater than the reporting threshold to require reporting;
- Would not require a facility to perform additional tests (e.g., stack testing) to calculate emissions (i.e., use best available data);
- Exploring ways to provide financial and technical assistance to review a company's operations and find ways to reduce their use of chemicals (pollution prevention);
- Reporting to possibly be done through OWNERS;
- Proposed program would be phased in to give facilities time to learn about the bylaw and begin collecting the necessary data;
- Information collected would be made available through either a searchable website or an annual summary report (to be made available electronically);
- Record keeping for 7 years for auditing purposes;
- Disclosure of reported information would be made available in accordance with the *Municipal Freedom of Information and Protection of Privacy Act*;
- Toronto Public Health is seeking feedback and comments on the proposed program from businesses (including institutions and trade associations), residents, community organizations and other stakeholders, which must be received by 5:00 pm EST on February 6, 2008 (can email to [publichealth@toronto.ca](mailto:publichealth@toronto.ca)).

For more information, please visit [http://www.toronto.ca/health/hphe/enviro\\_info.htm](http://www.toronto.ca/health/hphe/enviro_info.htm)

**Table 1: Reporting Thresholds for Priority Chemicals**

Chemical Name	CAS No.	Reporting threshold
		(kg/yr)
Acetaldehyde	75-07-0	100
Acrolein	107-02-8	100
Benzene	71-43-2	100
1,3-Butadiene	106-99-0	100
Cadmium <sup>1</sup>	-	10
Carbon tetrachloride	56-23-5	100
Chloroform (trichloromethane)	67-66-3	100
Chromium, Non-hexavalent <sup>1</sup>	-	100
Chromium, Hexavalent <sup>1</sup>	-	10
1,4-Dichlorobenzene	106-46-7	100
1,2-Dichloroethane (Ethylene dichloride)	107-06-2	100
Dichloromethane (Methylene chloride)	75-09-2	100
1,2-dibromoethane (Ethylene dibromide)	106-93-4	100
Formaldehyde	50-00-0	100
Lead <sup>1</sup>	-	10
Manganese <sup>1</sup>	-	10
Mercury <sup>1</sup>	-	10
Nickel <sup>1</sup>	-	100
NOx <sup>2</sup>	-	200
PAHs <sup>3</sup>	-	10
PM <sub>2.5</sub> <sup>4</sup>	-	30
Tetrachloroethylene	127-18-4	100
Trichloroethylene	079-01-6	100
Vinyl chloride	75-01-4	100
VOCs (total) <sup>3</sup>	-	100

CAS = Chemical Abstract Service, a common system of identifying chemicals  
<sup>1</sup> and its compounds (Different compounds have different CAS numbers.)

<sup>2</sup> expressed as NO<sub>2</sub>.

<sup>3</sup> as defined by the National Pollutant Release Inventory

<sup>4</sup> means any particulate matter with a diameter less than or equal to 2.5 micrometers

**Table 2: Exemptions from Reporting**

Sector Exemptions	- individual residences, including apartments and condominiums
	- facilities where the retail sale of the substance or articles that contain the substance is the <u>primary</u> activity
	- small medical facilities, such as doctors' and dentists' offices
	- construction sites
	- accommodation and food services (i.e. hotels and restaurants)
Source Exemptions	- chemicals that exist as part of an "article" and are not released by using that article (for example, chromium in the metal alloy of a tool or mechanical part is not released while using the tool or part; a facility that manufactures the alloy, tool or part would have to estimate the chromium used and released)
	- the distribution, storage or retail sale of fuels
	- personal use by employees or other persons
	- grounds maintenance or janitorial use
	- transportation and vehicle emissions
	- materials used as structural components of the facility
	- intake water or intake air, such as water used for process cooling or air used as compressed air or for combustion
	- road dust
- emissions from space heating	