

MEMORANDUM

To: Dr. Eshetu Beshada

Cc: Rodney Badgley, Michael Bertram (AMEC)

Re: MB Approvals Branch request for additional information (letter dated Sept.

27, 2013)

Date: October 7, 2013

Dear Dr. Beshada,

Please accept the following information in response to your letter dated Sept. 27, 2013. If you require additional clarification please contact me.

Plasti-Fab manufactures sustainable insulation products for construction and home renovation markets. Our insulation products provide customers with energy saving solutions which in turn provide emissions reduction potential that reduce environmental impacts.

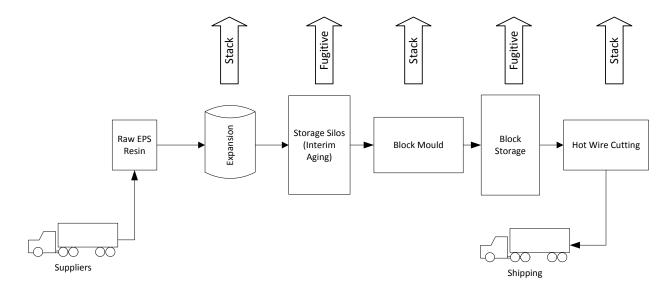
1. <u>Description of Facility & Capacity</u>

The plant manufactures material as per the demand of the market place which can fluctuate both year to year and seasonally with the construction market. The maximum capacity of the facility is 350,000 lbs. per month or 4,000,000 lbs. per year. Please see attached floor plan (pdf) showing plant layout and equipment location.

2. EPS Foam Process

Saturated steam is applied to EPS resin to expand (sometimes called "prefoam") the material using a continuous expander. The blowing agent is contained within the raw EPS resin materials purchased from suppliers. The blowing agent is a VOC predominately n-pentane (CAS# 109-66-0). Following prefoaming the foamed beads are left to stabilize within mesh aging silos followed by air conveyance transfer to a block moulding machine for production of foam blocks. The blocks are aged for at least 3 days to stabilize the material, reduce moisture content and allow remaining VOC blowing agent to migrate out. The large blocks are then cut using electrically heated wires into desired sizes and thickness for construction and industrial applications. Finally the materials are packaged and shipped to customers (see process flow diagram next page).

Process flow diagram – showing VOC emission sources.



3. Luconyl dye Application

A small percentage of foam products are coloured with a water based dye at the prefoaming stage (see attached procedure). No potential emissions of dye are expected.

4. VOC Emissions

VOC's are emitted as both fugitive and stack emissions from the various stages (see process flow diagram above) of the process (see table below). There is no emission capture or control technology installed.

5. Quantity of Raw Materials on site

The maximum onsite inventory of EPS resin would be 132,000 lbs and maximum inventory of dye would be 120 kg.

VOC Emissions summary table (based on 2012 NPRI data report)

				Percentage Loss at
Process Stage	Source	Quantity	Unit	each stage
Pre-Expansion	Stack	18.4	tonne	31%
	Fugitive & Exhaust			
Silo Aging	Fans	8.3	tonne	14%
Block				
Moulding	Stack	5.9	tonne	10%
	Fugitive & Exhaust			
Block Aging	Fans	17.8	tonne	30%
Final Product	Remaining in product	8.9	tonne	15%
	Total Emissions	50.5	tonne	

From the desk of...

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