Toxic Substance Reduction Plan Summary

for

Acetone (CAS No. 67-64-1)

Methyl Ethyl Ketone (MEK) (CAS No. 78-93-3)

Toluene (CAS No. 108-88-3)

Prepared for:

Vulsay Industries Ltd.
35 Regan Road
Brampton, Ontario
L7A 1B2

Prepared By:

Taylor Environmental & Safety Solutions
o/o Taylor McDonald Consulting Group Inc.
13 Craig Street
Brampton, Ontario
L6Y 1H8

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Toxic Substance Plan Statement

Vulsay has completed a Toxic Substance Reduction Plan for their facility and this plan has examined each reduction category for options for the reduction in the use of Acetone, Methyl Ethyl Ketone (MEK) and Toluene at the facility.

At this time, Vulsay has not identified any new reduction options. However, as part of the continuous improvement philosophy at Vulsay, staff review and evaluate new advances as they become available. Any promising developments will be assessed for inclusion into future Toxic Substance Reduction Plans.

Toxic Substance Plan Summary and Certification

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Com	pany

Vulsay Industries Ltd.

Parent Company:

Greif Bros. Canada Inc.

Name: Address:

35 Regan Road,

Brampton L7A 1B2

Address:

370-380 Millen Rd.

Stoney Creek, Ontario

L8E 2H5

Number of

60

UTM Spatial Coordinates

596189 E,

Employees NAICS Code

325999

4839819 N (Zone 17)

NPRI ID# Ontario MOE ID# 3599 NA

Facility

Geoff Kilburn

Public

Contact

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General Manager

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Toxic

Substances Acetone,

CAS#

67-64-1

Methyl Ethyl Ketone (MEK)

78-93-3

and

Toluene

108-88-3

Toxic Reduction Policy Statement of Intent

Acetone, Methyl Ethyl Ketone (MEK) and Toluene are currently used by Vulsay in production process. Vulsay intends to reduce the use of this toxic substance at the facility where possible. This facility does not create Acetone, Methyl Ethyl Ketone (MEK) and Toluene; therefore this plan will not address reducing its creation.

Reduction Objectives

Vulsay prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. Vulsay will strive to reduce the use of the toxic substance Acetone, Methyl Ethyl Ketone (MEK) and Toluene. This plan will determine the technical and economic feasibility of each option identified to determine which, if any, are viable for implementation at this time.

Description of Substances

The Toxic Substances: Acetone, Methyl Ethyl Ketone (MEK) and Toluene are used at the facility as sub-components contained in a pre-blended compound which is packaged for use as a spray paint gun cleaner for commercial and industrial use.

In the calendar year of 2015, Vulsay used 7.856 tonnes of Acetone, 15.713 Tonnes of Methyl Ethyl Ketone (MEK) and 31.426 Tonnes of Toluene in the processes at the facility. This was the first year in which Vulsay exceeded the threshold (10 tonnes for MEK and Toluene) for reporting to the National Pollutant Release Inventory (NPRI), administered by Environment Canada and therefore subject to Ontario Regulation 455/09 under the Toxics Reduction Act. Also, this was the first year in which Vulsay exceeded the threshold (3 tonnes) for Acetone for reporting as per Ontario Regulation 127/01 and therefore subject to Ontario Regulation 455/09 under the Toxics Reduction Act.

Toxic Substance Reduction Option to be Implemented

No Options identified

Plan Summary Statement

Vulsay has completed a Toxic Substance Reduction Plan for their facility and this plan has examined each reduction category to identify options for the reduction in the use of Acetone, Methyl Ethyl Ketone (MEK) and Toluene at the facility.

At this time, Vulsay has not identified any new reduction options. However, as part of the continuous improvement philosophy at Vulsay, staff review and evaluate new advances as they become available. Any promising developments will be assessed for inclusion into future Toxic Substance Reduction Plans.

Certification by Highest Ranking Employee

As of November 14, 2016, I, Geoff Kilburn, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Signature

Acetone, Methyl Ethyl Ketone (MEK) and Toluene

__ November 14, 2016

Certification by Licensed Planner

As of November 14, 2016, I, Stan Taylor certify that I am familiar with the processes at Vulsay Industries Ltd. that use or create the toxic substances referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the toxic substance reduction plans referred to below for the toxic substances and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Acetone, Methyl Ethyl Ketone (MEK) and Toluene - Plan Dated November 14th, 2016

_____ November 14, 2016

Stan Taylor, BSc

Toxic Substance Reduction Planner, TSRP0290

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Taylor Environmental & Safety Solutions

o/o Taylor McDonald Consulting Group Inc.