

## NALCO CANADA CO. – BURLINGTON TOXICS REDUCTION PLAN FOR TOTAL PHOSPHORUS

### Executive Summary

Stantec Consulting Ltd. (Stantec) has worked with Nalco Canada Co. (Nalco) to prepare this Toxics Reduction Plan for their facility located at 1055 Truman Street in Burlington, Ontario. The subject toxic substance is total phosphorus (Phase II toxic substance) processed and used in the facility. The substance met the 2012 NPRI reporting criteria and thus a toxics reduction plan is required in accordance with the Ontario Toxic Reduction Act (2009) and Ontario Regulation 455/09. This plan was prepared to meet the requirements of the Act and the Regulation. Nalco has also prepared a plan for each of the other applicable Phase II toxic substances (isopropyl alcohol, nonylphenol and ethoxylates, and sodium nitrite).

The purpose of the plan is for the facility to undertake toxic substance accounting to better understand the quantities of toxic substances that are used, created, transformed, destroyed, released, disposed of, and contained in product; and to examine how the amount of the toxic substance used or created at the facility could be reduced or eliminated by implementing technically and economically feasible toxic substance reduction options. The following are included in the plan:

- Basic facility information.
- Statement of intent to reduce use and creation of the toxic substance.
- Toxic substance accounting data, including
  - identification and description of stages and processes;
  - descriptions of how, when, where, and why the substance is used and/or created;
  - process flow diagrams;
  - data and methods used in toxic substance accounting; and,
  - analysis of input/output balances.
- Costs associated with the use, creation, release, disposal, and transfer of the toxic substance.
- Toxics reduction options.
- Reduction estimates, technical and economic feasibilities analysis.
- Summary of options to be implemented.
- Recommendations in applicable categories.

Nalco has taken proactive initiatives to reduce the use of toxics (including total phosphorus) through process modification, spill/leakage prevention, onsite reuse, inventory management systems and specific training programs. The facility has detailed material storage, handling and monitoring procedures to prevent the loss of the substance. The facility does not create total phosphorus onsite and this plan does not address reducing its creation

Based on the nature of the facility operation, no further toxics reduction options have been identified as feasible for the facility. Therefore, the facility does not plan to implement toxics reduction options additional to the practices that the facility is performing as part of their Responsible Care and continuing improvement programs.

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Nalco Canada Co. continues to be committed to playing a leadership role in protecting the environment. Under the requirements of the Chemistry Industry Association of Canada (CIAC), Nalco Canada's Burlington plant is a "Responsible Care" facility. The company will continue to apply the industrial sector best practices and continuous improvement strategies to reduce the use and minimize the release/leak of the of the subject toxic substance.

The plan was certified by the highest ranking official at Nalco and a licenced planner from Stantec.

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PLAN CERTIFICATIONS  
December 6, 2013

## 9.0 PLAN CERTIFICATIONS

### CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 6, 2013, I, Peter Westerterp, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substance: Total Phosphorus (CAS N/A)



December 10, 2013

Peter Westerterp  
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pwesterterp@nalco.com

Date

### CERTIFICATION BY LICENSED PLANNER

As of December 6, 2013, I, Ruouu (Boris) Chen certify that I am familiar with the processes at Nalco Canada Co. that use or create the toxic substance 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 plan dated December 6, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substance: Total Phosphorus (CAS N/A)



December 6, 2013

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Date

