

WALTERS INDUSTRIES-PRINCETON OPERATIONS

30 BRENTWOOD DRIVE, PRINCETON, ONTARIO, N0J 1V0

TOXICS REDUCTION ACT TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES 2012

REPORT PREPARED BY:

O2E INC.

REPORT PREPARED FOR:

MARTY VERHEY

MAY 10, 2013

LONDON

•

ONTARIO

•

CANADA



Table of Contents

1.	PLAN SUMMARY – SELENIUM (AND ITS COMPOUNDS)	1
1.1	Basic Facility Information	1
1.2	Toxic Reduction Policy Statement of Intent	1
1.3	Reduction Objectives	1
1.4	Description of Substance	1
1.5	Toxic Substance Reduction Option to be Implemented	1
1.6	Plan Summary Statement	2
1.7	Copy of Plan Confirmation	2
2.	PLAN SUMMARY – XYLENE	3
2.1	Basic Facility Information	3
2.2	Toxic Reduction Policy Statement of Intent	3
2.3	Reduction Objectives	3
2.4	Description of Substance	3
2.5	Toxic Substance Reduction Option to be Implemented	3
2.6	Plan Summary Statement	4
2.7	Copy of Plan Confirmation	4
3.	PLAN SUMMARY – TOLUENE	5
3.1	Basic Facility Information	5
3.2	Toxic Reduction Policy Statement of Intent	5
3.3	Reduction Objectives	5
3.4	Description of Substance	5
3.5	Toxic Substance Reduction Option to be Implemented.	5
3.6	Plan Summary Statement	6
3.7	Copy of Plan Confirmation	6
4.	BASIC FACILITY INFORMATION	7
5.	COPY OF PLAN CONFIRMATION	8

1. PLAN SUMMARY – SELENIUM (AND ITS COMPOUNDS)

Name and CASRN of Substance	Selenium (and its compounds)	Not Applicable
Substances for which other plans have been prepared	Xylene Toluene	CAS # 1330-20-7 CAS # 108-88-3

1.1 Basic Facility Information

Basic facility information has been included in Section 4 of this document.

1.2 Toxic Reduction Policy Statement of Intent

Walters Inc.'s corporate vision is to be an industry leader in value creation by being the best steward of resources: human, capital

Walters Inc. commits to implementing and maintaining an effective environmental management program that will govern its attitude and action in environmental matters and will benefit the environment, the community, the shareholders, employees and customers.

Wherever feasible, Walters Inc. will reduce the use and release of Selenium in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters Inc., and we will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at our facility.

1.3 Reduction Objectives

All employees at Walters Inc. will be involved in the reduction of toxic substance use, creation and releases. Our goal is to reduce the use of Selenium where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through procedure improvements, employee education and training.

1.4 Description of Substance

Selenium is a naturally occurring base metal in the steel used by the facility.

1.5 Toxic Substance Reduction Option to be Implemented

The following option has been identified for implementation to reduce the use and release of Selenium:

- Process Modification – continuous improvement of manufacturing process and scrap collection.

Selenium reductions due to implementing the option above are as follows:

Company Name: Walters Inc.

Substance: Selenium

CASRN: 7782-49-2

Reduction Option: Process Modification

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	53,578.8	0	52,380	0	0	0	0	0	1,198
Estimated reduced amount	53,459.0	0	0	0	0	0	0	0	1,078.2
Reduction	119.8	0	0	0	0	0	0	0	119.8
% Reduction	0.2%	NA	NA	NA	NA	NA	NA	NA	10%

Note: All values are presented in kilograms (kg) per year unless noted.

1.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Selenium, prepared on behalf of Walters Inc., dated May 10, 2013.

1.7 Copy of Plan Confirmation

A copy of the plan confirmation is presented in Section 5 of this document.

2. PLAN SUMMARY – XYLENE

Name and CASRN of Substance	Xylene	CAS # 1330-20-7
Substances for which other plans have been prepared	Toluene Selenium (and its compounds)	CAS # 108-88-3 Not Applicable

2.1 Basic Facility Information

Basic facility information has been included in Section 4 of this document.

2.2 Toxic Reduction Policy Statement of Intent

Walters Inc.'s corporate vision is to be an industry leader in value creation by being the best steward of resources: human, capital

Walters Inc. commits to implementing and maintaining an effective environmental management program that will govern its attitude and action in environmental matters and will benefit the environment, the community, the shareholders, employees and customers.

Wherever feasible, Walters Inc. will reduce the use and release of Xylene in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters Inc., and we will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at our facility.

2.3 Reduction Objectives

All employees at Walters Inc. will be involved in the reduction of toxic substance use, creation and releases. Our goal is to reduce the creation of Xylene where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through process modifications, procedure improvements, equipment changes, and employee education and training.

2.4 Description of Substance

Xylene is an organic solvent used a component of thinners, paint and primers used in commercial and industrial grade coatings.

2.5 Toxic Substance Reduction Option to be Implemented

The following option has been identified for implementation to reduce the creation and release of Xylene :



- Process Modification - Optimize the application of mixed paint products handling points to reduce the release of Xylene at all handling points.
- Spill and Leak Prevention - Improve the recovery of paint products at the paint centres
- On-site reuse or recycling - Optimize the distillation process to maximize recovery of Xylene based materials.
- Improved Operating Practices - Develop standard work for the use collection, reuse and disposal of Xylene.

Company Name: Walters Inc.

Substance: Xylene

CASRN: 1330-20-7

Reduction Option: Process Modification, Spill and Leak Prevention, On-site Reuse or Recycling, Training, Improved Operating Practices

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	11.757	0.000	0.000	11.757	0.000	0.000	0.000	0.000	0.000
Estimated reduced amount	10.875	0.000	0.000	10.875	0.000	0.000	0.000	0.000	0.000
Reduction	0.882	0.000	0.000	0.882	0.000	0.000	0.000	0.000	0.000
% Reduction	7.5%	NA	NA	7.5%	NA	NA	NA	NA	NA

Note: All values are presented in metric tonnes (Mg) per year unless noted.

2.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Xylene, prepared on behalf of Walters Inc., dated May 10, 2013.

2.7 Copy of Plan Confirmation

A copy of the plan confirmation is presented at the end of this document.

3. PLAN SUMMARY – TOLUENE

Name and CASRN of Substance	Toluene	CAS # 108-88-3
Substances for which other plans have been prepared	Xylene Selenium (and its compounds)	CAS # 1330-20-7 Not Applicable

3.1 Basic Facility Information

Basic facility information has been included in Section 4 of this document.

3.2 Toxic Reduction Policy Statement of Intent

Walters Inc.'s corporate vision is to be an industry leader in value creation by being the best steward of resources: human, capital and forest.

Walters Inc. commits to implementing and maintaining an effective environmental management program that will govern its attitude and action in environmental matters and will benefit the environment, the community, the shareholders, employees and customers.

Wherever feasible, Walters Inc. will reduce the use and release of Toluene in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters Inc., and we will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at our facility.

3.3 Reduction Objectives

All employees at Walters Inc. will be involved in the reduction of toxic substance use, creation and releases. Our goal is to reduce the use of Toluene where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through process modifications, procedure improvements, equipment changes, and employee education and training.

3.4 Description of Substance

Toluene is an organic solvent used a component of thinners, paint and primers used in commercial and industrial grade coatings.

3.5 Toxic Substance Reduction Option to be Implemented.

The following option has been identified for implementation to reduce the use and release of Toluene:



- Process Modification - Optimize the application of mixed paint products handling points to reduce the release of Toluene at all handling points.
- Spill and Leak Prevention - Improve the recovery of paint products at the paint centres
- On-site reuse or recycling - Optimize the distillation process to maximize recovery of Toluene based materials.
- Improved Operating Practices - Develop standard work for the use, collection, reuse and disposal of Toluene.

Toluene reductions due to implementing the option above are as follows:

Company Name: Walters Inc.

Substance: Toluene

CASRN: 108-88-3

Reduction Option: Process Modification, Spill and Leak Prevention, On-site Reuse or Recycling, Training, Improved Operating Practices

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	7.343	0.000	0.000	7.343	0.000	0.000	0.000	0.000	0.000
Estimated reduced amount	6.793	0.000	0.000	6.793	0.000	0.000	0.000	0.000	0.000
Reduction	0.55	0.000	0.000	0.55	0.000	0.000	0.000	0.000	0.000
% Reduction	7.5%	NA	NA	7.5%	NA	NA	NA	NA	NA

Note: All values are presented in kilograms (kg) per year unless noted.

3.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Toluene, prepared on behalf of Walters Inc., dated May 10, 2013.

3.7 Copy of Plan Confirmation

A copy of the plan confirmation is presented at the end of this document.

4. BASIC FACILITY INFORMATION

Facility Identification and Site Address		
Company Name	Walters Incorporated	
Facility Name	Princeton Facility	
Facility Address	Physical Address:	Mailing Address
	30 Brentwood Drive Princeton ON N0J 1V0	Walters Incorporated 1318 Rymal Road East Hamilton, Ontario L8W 3N1
Spatial Coordinates (UTM)	539234	4776014
Datum	WGS84	
Number of Employees	55 (Full time equivalents)	
NPRI ID	7366	
ON MOE ID	-	
Parent Company Information		
Parent Company Name & Address	Walters Incorporated 1318 Rymal Road East Hamilton, Ontario L8W 3N1	
Percent Ownership	100%	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 Manufacturing.	
4 Digit NAICS Code	3323 Architectural and Structural materials and manufacturing.	
6 Digit NAICS Code	332319- Other Plate work and fabricated structural product manufacturing.	
Company Contact Information		
Facility Public Contact	Marty Verhey , HR/QA Coordinator	Contact Address
	MartyV@waltersinc.com	Walters Incorporated 1318 Rymal Road East Hamilton, Ontario L8W 3N1
	Phone: 905-388-7111	
	Fax: 905-575-7747	

5. COPY OF PLAN CONFIRMATION

Rationale Statement – Highest Ranking Employee

Submission of the required plan summaries and certification statements via the Environment Canada Single Window Information Manager (SWIM) system has been delayed as a result of the investigation and assessment of reduction options taking longer than anticipated to complete. Rather than compromise the integrity of the report and results by rushing the assessment to meet the deadline, we have chosen to take the time to properly evaluate all options we believe to be currently available for our operations. As such, submission of the required elements of the toxic substance reduction plans could not be made by the regulatory deadline.

Confirmation by the Highest Ranking Employee

As of May 10, 2013, I, Mike Wallbank, confirm 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, with the exception of the regulatory deadline, comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Selenium (and its compounds) Toluene
Xylene



Mike Wallbank
Plant Manager
Walters Inc. – Princeton Plant

Confirmation by Licensed Planner

As of May 29, 2013, I, Tim Logan confirm that I am familiar with the processes at Walters Inc.'s Princeton Plant 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 plans dated December 24, 2012 and that the plans, with the exception of the regulatory deadline, comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Selenium (and its compounds) Toluene
Xylene



, May 29, 2013

Tim Logan (License No. TSRP0003)
President
O2E Inc. Environmental Consultants