

# WALTERS INDUSTRIES-PRINCETON OPERATIONS

30 BRENTWOOD DRIVE, PRINCETON, ONTARIO, N0J 1V0

## TOXICS REDUCTION ACT TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES 2013

REPORT PREPARED BY:  
*O2E INC.*

REPORT PREPARED FOR:  
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MAY 31, 2014

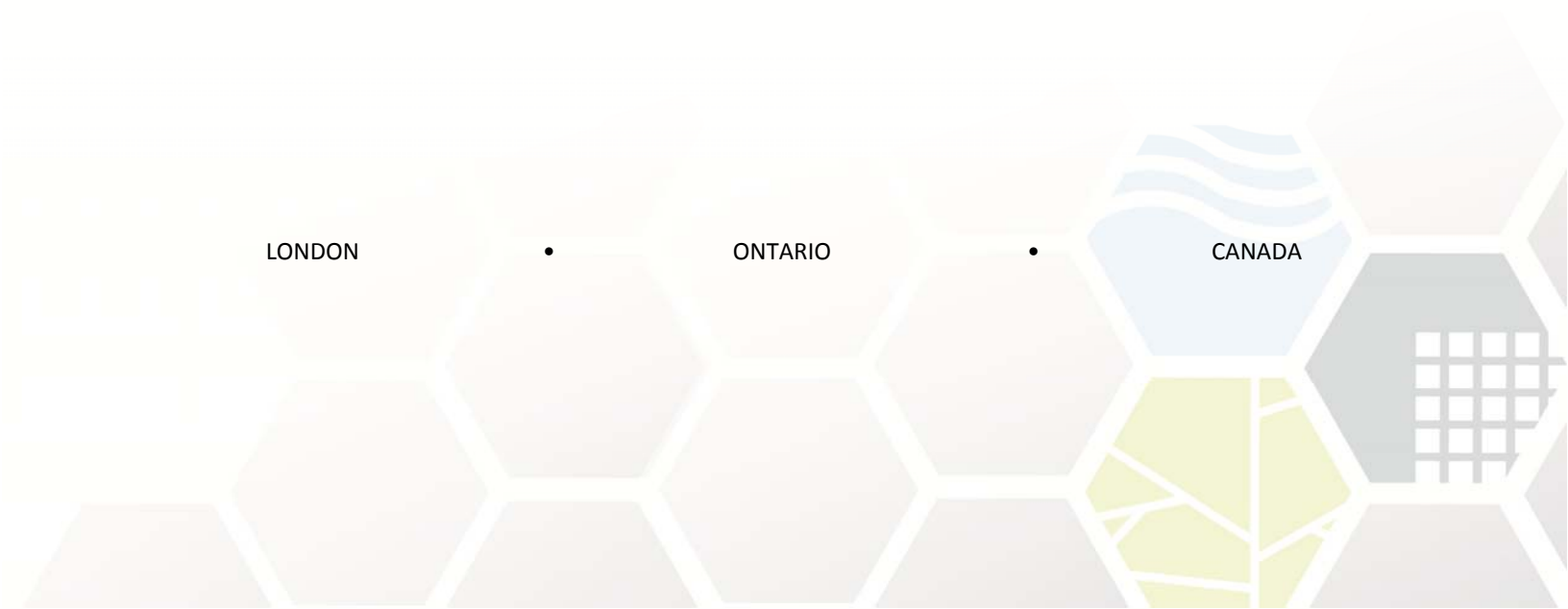
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## 1. PLAN SUMMARY – 1,2,4-TRIMETHYLBENZENE

<b>Name and CASRN of Substance</b>	1,2,4-Trimethylbenzene	95-63-6
<b>Substances for which other plans have been prepared</b>	Isopropyl Alcohol	67-63-0
	Light Aromatic Solvent Naphtha	64742-95-6
	Methyl Ethyl Ketone	78-93-3
	Methyl Isobutyl Ketone	108-10-1
	VM&P Naphtha	64742-89-8
	Zinc (and its compounds)	NA - 14
	Selenium (and its compounds)	NA - 12
	Xylene	1330-20-7
	Toluene	108-88-3

### 1.1 Basic Facility Information

Basic facility information has been included in Section 8 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 1,2,4-Trimethylbenzene in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters Inc., and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

### 1.3 Reduction Objectives

Walter's goal is to reduce the use and release of 1,2,4-Trimethylbenzene where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through spill and leak prevention.

### 1.4 Description of Substance

1,2,4-Trimethylbenzene is exclusively used as an ingredient to assist in reducing the viscosity of the paint products prior to application on the structural steel components.



## 1.5 Toxic Substance Reduction Option to be Implemented

The following option has been identified for implementation to reduce the use and release of 1,2,4-Trimethylbenzene:

- Spill and Leak Prevention - Minimize fugitive emissions from the paint process.

1,2,4-Trimethylbenzene reductions due to implementing the option above are as follows:

Company Name: Walters Inc.

Substance: 1,2,4-Trimethylbenzene

CASRN: 95-63-6

Reduction Option: Process Modification

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	1.146	0	0	1.146	0	0	0	0	0
Estimated reduced amount	1.135	0	0	1.135	0	0	0	0	0
Reduction	0.011	0	0	0.011	0	0	0	0	0
% Reduction	1%	NA	NA	1%	NA	NA	NA	NA	NA

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

## 1.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for 1,2,4-Trimethylbenzene, prepared on behalf of Walters Inc., dated May 31, 2014.

## 1.7 Copy of Plan Certification

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

## 2. PLAN SUMMARY – ISOPROPYL ALCOHOL

<b>Name and CASRN of Substance</b>	Isopropyl Alcohol	67-63-0
<b>Substances for which other plans have been prepared</b>	1,2,4-Trimethylbenzene	95-63-6
	Light Aromatic Solvent Naphtha	64742-95-6
	Methyl Ethyl Ketone	78-93-3
	Methyl Isobutyl Ketone	108-10-1
	VM&P Naphtha	64742-89-8
	Zinc (and its compounds)	NA - 14
	Selenium (and its compounds)	NA - 12
	Xylene	1330-20-7
	Toluene	108-88-3

### 2.1 Basic Facility Information

Basic facility information has been included in Section 8 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 **Isopropyl Alcohol (IPA)** in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

### 2.3 Reduction Objectives

Walter's goal is to reduce the use and release of IPA where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through spill and leak prevention and training or improving operating practices.

## 2.4 Description of Substance

Isopropyl alcohol 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 Isopropyl Alcohol :

- Spill and Leak Prevention – Minimize fugitive emissions from paint process
- Training or Improved Operating Practices – Standardize the use of IPA in top coat operations

Company Name: Walters Inc.

Substance: Isopropyl Alcohol

CASRN: 67-63-0

Reduction Option: Spill and Leak Prevention, Training or Improved Operating Practices

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	1.014	0.000	0.000	1.014	0.000	0.000	0.000	0.000	0.000
Estimated reduced amount	0.997	0.000	0.000	0.997	0.000	0.000	0.000	0.000	0.000
Reduction	0.017	0.000	0.000	0.017	0.000	0.000	0.000	0.000	0.000
% Reduction	1.7%	NA	NA	1.7%	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 Isopropyl Alcohol prepared on behalf of Walters Inc., dated May 31, 2014.

## 2.7 Copy of Plan Certification

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

### 3. PLAN SUMMARY – LIGHT AROMATIC SOLVENT NAPHTHA

Name and CASRN of Substance	Light Aromatic Solvent Naphtha	64742-95-6
Substances for which other plans have been prepared	1,2,4-Trimethylbenzene	95-63-6
	Isopropyl Alcohol	67-63-0
	Methyl Ethyl Ketone	78-93-3
	Methyl Isobutyl Ketone	108-10-1
	VM&P Naphtha	64742-89-8
	Zinc (and its compounds)	NA - 14
	Selenium (and its compounds)	NA - 12
	Xylene	1330-20-7
	Toluene	108-88-3

#### 3.1 Basic Facility Information

Basic facility information has been included in Section 8 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

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 Light Aromatic Solvent Naphtha (**LASN**) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

#### 3.3 Reduction Objectives

Walter's goal is to reduce the use and release of LASN where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through process modification, leak prevention and improved operating practices.

#### 3.4 Description of Substance

Light Aromatic Solvent Naphtha 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:

- Spill and Leak Prevention - Minimize fugitive emissions from the paint process
- Training or Improved Operating Practices - Standardize the use of LASN (as a thinner) in top coat operations..

Light Aromatic Solvent Naphtha reductions due to implementing the option above are as follows:

Company Name: Walters Inc.

Substance: Light Aromatic Solvent Naphtha

CASRN: 64742-95-6

Reduction Option: Spill and Leak Prevention, Training or Improved Operating Practices

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	4.200	0.000	0.000	4.200	0.000	0.000	0.000	0.000	0.000
Estimated reduced amount	4.075	0.000	0.000	4.075	0.000	0.000	0.000	0.000	0.000
Reduction	0.125	0.000	0.000	0.125	0.000	0.000	0.000	0.000	0.000
% Reduction	2.98%	NA	NA	2.98%	NA	NA	NA	NA	NA

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

### 3.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Light Aromatic Solvent Naphtha, prepared on behalf of Walters Inc., dated May 31, 2014.

### 3.7 Copy of Plan Certification

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

#### 4. PLAN SUMMARY – METHYL ETHYL KETONE

<b>Name and CASRN of Substance</b>	Methyl Ethyl Ketone	78-93-3
<b>Substances for which other plans have been prepared</b>	1,2,4-Trimethylbenzene	95-63-6
	Isopropyl Alcohol	67-63-0
	Light Aromatic Solvent Naphtha	64742-95-6
	Methyl Isobutyl Ketone	108-10-1
	VM&P Naphtha	64742-89-8
	Zinc (and its compounds)	NA - 14
	Selenium (and its compounds)	NA - 12
	Xylene	1330-20-7
	Toluene	108-88-3

##### 4.1 Basic Facility Information

Basic facility information has been included in Section 8 of this document.

##### 4.2 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, its shareholders, employees and customers.

Wherever feasible, Walters Inc. will reduce the use and release of Methyl Ethyl Ketone (**MEK**) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

##### 4.3 Reduction Objectives

Walters' goal is to reduce the use and release of MEK where technically and economically feasible by the timetable noted in the plan. They will achieve these reductions through spill and leak prevention and employee education and training.

##### 4.4 Description of Substance

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

#### 4.5 Toxic Substance Reduction Option to be Implemented.

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

- Spill and Leak Prevention – Minimize fugitive losses by covering open containers.
- Training or Improved Operating Practices – Standardize the use of MEK in top coat operations.

Methyl Ethyl Ketone reductions due to implementing the option above are as follows:

Company Name: Walters Inc.

Substance: Methyl Ethyl Ketone

CASRN: 78-93-3

Reduction Option: Spill and Leak Prevention, Training or Improved Operating Practices

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	9.169	0.000	0.000	9.169	0.000	0.000	0.000	0.000	0.000
Estimated reduced amount	8.959	0.000	0.000	8.959	0.000	0.000	0.000	0.000	0.000
Reduction	0.210	0.000	0.000	0.210	0.000	0.000	0.000	0.000	0.000
% Reduction	2.3%	NA	NA	2.3%	NA	NA	NA	NA	NA

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

#### 4.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Methyl Ethyl Ketone, prepared on behalf of Walters Inc., dated May 31, 2014.

#### 4.7 Copy of Plan Certification

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

## 5. PLAN SUMMARY – METHYL ISOBUTYL KETONE

<b>Name and CASRN of Substance</b>	Methyl Isobutyl Ketone	108-10-1
<b>Substances for which other plans have been prepared</b>	1,2,4-Trimethylbenzene	95-63-6
	Isopropyl Alcohol	67-63-0
	Light Aromatic Solvent Naphtha	64742-95-6
	Methyl Ethyl Ketone	78-93-3
	VM&P Naphtha	64742-89-8
	Zinc (and its compounds)	NA - 14
	Selenium (and its compounds)	NA - 12
	Xylene	1330-20-7
	Toluene	108-88-3

### 5.1 Basic Facility Information

Basic facility information has been included in Section 8 of this document.

### 5.2 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 Methyl Isobutyl Ketone (**MIBK**) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

### 5.3 Reduction Objectives

Walter's goal is to reduce the creation of MIBK where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through spill and leak prevention and improving operating practices.

### 5.4 Description of Substance

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



## 5.5 Toxic Substance Reduction Option to be Implemented.

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

- Spill and Leak Prevention - Minimize fugitive emissions from the paint process
- Training or Improved Operating Practices - Standardize the use of MIBK in top coat operations.

Methyl Isobutyl Ketone reductions due to implementing the option above are as follows:

Company Name: Walters Inc.

Substance: Methyl Isobutyl Ketone

CASRN: 108-10-1

Reduction Option: Spill and Leak Prevention, Training or Improved Operating Practices

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	4.230	0.000	0.000	4.230	0.000	0.000	0.000	0.000	0.000
Estimated reduced amount	4.110	0.000	0.000	4.110	0.000	0.000	0.000	0.000	0.000
Reduction	0.12	0.000	0.000	0.12	0.000	0.000	0.000	0.000	0.000
% Reduction	2.8%	NA	NA	2.8%	NA	NA	NA	NA	NA

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

## 5.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Methyl Isobutyl Ketone, prepared on behalf of Walters Inc., dated May 31, 2014.

## 5.7 Copy of Plan Certification

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

## 6. PLAN SUMMARY – VM&P NAPHTHA

Name and CASRN of Substance	VM&P Naphtha	64742-89-8
Substances for which other plans have been prepared	1,2,4-Trimethylbenzene	95-63-6
	Isopropyl Alcohol	67-63-0
	Light Aromatic Solvent Naphtha	64742-95-6
	Methyl Ethyl Ketone	78-93-3
	Methyl Isobutyl Ketone	108-10-1
	Zinc (and its compounds)	NA - 14
	Selenium (and its compounds)	NA - 12
	Xylene	1330-20-7
	Toluene	108-88-3

### 6.1 Basic Facility Information

Basic facility information has been included in Section 8 of this document.

### 6.2 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 VM&P Naphtha (**VMPN**) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

### 6.3 Reduction Objectives

Walter's goal is to reduce the use and release of VMPN where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through spill and leak prevention.

### 6.4 Description of Substance

VM&P Naphtha is an organic solvent used a component of thinners, paint and primers used in commercial and industrial grade coatings.

## 6.5 Toxic Substance Reduction Option to be Implemented.

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

- Spill and Leak Prevention - Minimize fugitive emissions from the paint process.

VM&P Naphtha reductions due to implementing the option above are as follows:

Company Name: Walters Inc.

Substance: VM&P Naphtha

CASRN: 64742-89-8

Reduction Option: Spill and Leak Prevention

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	3.543	0.000	0.000	3.543	0.000	0.000	0.000	0.000	0.000
Estimated reduced amount	3.508	0.000	0.000	3.508	0.000	0.000	0.000	0.000	0.000
Reduction	0.035	0.000	0.000	0.035	0.000	0.000	0.000	0.000	0.000
% Reduction	1%	NA	NA	1%	NA	NA	NA	NA	NA

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

## 6.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for VM&P Naphtha, prepared on behalf of Walters Inc., dated May 31, 2014.

## 6.7 Copy of Plan Certification

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

## 7. PLAN SUMMARY – ZINC AND ITS COMPOUNDS

Name and CASRN of Substance	Zinc (and its compounds)	NA - 14
Substances for which other plans have been prepared	1,2,4-Trimethylbenzene	95-63-6
	Isopropyl Alcohol	67-63-0
	Light Aromatic Solvent Naphtha	64742-95-6
	Methyl Ethyl Ketone	78-93-3
	Methyl Isobutyl Ketone	108-10-1
	VM&P Naphtha	64742-89-8
	Selenium (and its compounds)	NA - 12
	Xylene	1330-20-7
	Toluene	108-88-3

### 7.1 Basic Facility Information

Basic facility information has been included in Section 8 of this document.

### 7.2 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 Zinc (and its compounds) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Walters, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

### 7.3 Reduction Objectives

Walter's goal is to reduce the use and release of Zinc where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through equipment or process modification and improved operating practices.

### 7.4 Description of Substance

Zinc is exclusively used as an ingredient in its inorganic form either in suspended form or as an additive (dry) to an emulsion of distinct solvents prior to application on the structural steel



components. Generally, the zinc primers are mixed at the point of use and are applied 100 % to all available substrates.

**7.5 Toxic Substance Reduction Option to be Implemented.**

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

- Equipment or Process Modification - Optimize the application of primer products handling points.
- Training or Improved Operating Practices - Standardize the use of Zinc in top coat operations.

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

Company Name: Walters Inc.

Substance: Zinc and its compounds

CASRN: NA - 14

Reduction Option: Process Modification, Training or Improved Operating Practices

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	28.916	0.000	0.000	28.916	0.000	0.000	0.000	0.000	0.000
Estimated reduced amount	27.770	0.000	0.000	27.770	0.000	0.000	0.000	0.000	0.000
Reduction	1.146	0.000	0.000	1.146	0.000	0.000	0.000	0.000	0.000
% Reduction	4%	NA	NA	4%	NA	NA	NA	NA	NA

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

**7.6 Plan Summary Statement**

This plan accurately reflects the content of the toxic substance reduction plan for Zinc and its compounds, prepared on behalf of Walters Inc., dated May 31, 2014.

**7.7 Copy of Plan Certification**

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



## 8. BASIC FACILITY INFORMATION

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

## 9. COPY OF PLAN CONFIRMATIONS

### 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.

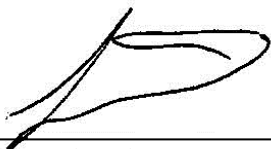
### Confirmation by the Highest Ranking Employee

As of May 31, 2014, I, John Vanderhorst, 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:

Light Aromatic Solvent Naphtha  
Isopropyl Alcohol  
Methyl Ethyl Ketone  
Zinc (and its compounds)

1,2,4-Trimethyl Benzene  
Methyl Isobutyl Ketone  
Solvent Naphtha Light Aliphatic



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John Vanderhorst  
Plant Manager  
Walters Inc. – Princeton Plant

## Confirmation by Licensed Planner

As of May 31, 2014 I, Tim Logan confirm that I am familiar with the processes at Walters Incorporated - Princeton 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 May 31, 2014 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:

Light Aromatic Solvent Naphtha  
Isopropyl Alcohol  
Methyl Ethyl Ketone  
Zinc (and its compounds)

1,2,4-Trimethyl Benzene  
Methyl Isobutyl Ketone  
Solvent Naphtha Light Aliphatic



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