

**WALTERS INC.**  
**PRINCETON OPERATIONS**  
**30 BRENTWOOD DRIVE, PRINCETON, ONTARIO, N0J 1V0**

**TOXICS REDUCTION ACT**  
**TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES**  
**2017**

REPORT PREPARED BY:  
*O2E INC.*

REPORT PREPARED FOR:  
*WALTERS INC.*

DECEMBER 21, 2018

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## 1. PLAN SUMMARY – Ethyl Alcohol

<b>Name and CASRN of Substance</b>	Ethyl Alcohol	64-17-5
<b>Substances for which other plans have been prepared</b>	Solvent Naphtha Medium Aliphatic	64742-88-7
	n-Butyl Acetate	123-86-4
	Methanol	67-56-1
	Propylene Glycol Methyl Ether Acetate	108-65-6
	Isopropyl Alcohol	67-63-0
	Light Aromatic Solvent Naphtha	64742-95-6
	Methyl Ethyl Ketone	78-93-3
	Methyl Isobutyl Ketone	108-10-1
	Solvent Naphtha Light Aliphatic	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 3 of this document.

### 1.2 Toxic Reduction Policy Statement of Intent

At Walters Inc., it is their policy to be environmentally responsible and limit the negative impact of their business activities as much as is reasonably possible. Walters Inc. is committed to environmentally responsible product design and manufacturing. The impact of manufacturing, through its processes, raw materials, waste generation and the alternative opportunities for products at the end of lifespan are of paramount concern. They are committed to continually improving in the areas of energy conservation, reduction of waste, reduction of hazardous substances, and reduction of water and air emissions.

Wherever feasible, Walters Inc. will reduce the use and release of Ethyl Alcohol 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

The reduction of toxic substance use, creation and releases is a priority for Walters Inc. forming part of their sustainability programs and environmental management systems. Based on currently available information and technologies, there are no technically and economically feasible reduction options currently available for this substance. However, Walters Inc. will



continue to investigate potential options as they arise as part of their sustainability programs.

#### **1.4 Description of Substance**

Ethyl Alcohol is mainly used as an ingredient to assist in reducing the viscosity of the paint products prior to application on the structural steel components. A wide variety of dimensional steel is coated in any of the three paint centres. Top coat paints are applied via air assisted airless technology (AAAS). AAAS technology is used due to the large surface area and necessity to transfer a large volume of material to the parts that require coverage. It should be noted that depending upon the customer's quality requirement, coatings can range from one single coat to multiple coats. Ethyl Alcohol is primarily released during this application process.

#### **1.5 Toxic Substance Reduction Option to be Implemented**

There are currently no options that have been determined to be both technically and economically feasible. Walters Inc. will continue to explore and investigate potential options as they arise as part of their commitment to environmental stewardship and sustainability.

#### **1.6 Plan Summary Statement**

This plan accurately reflects the content of the toxic substance reduction plan for Ethyl Alcohol, prepared on behalf of Walters Inc., dated December 10, 2018.

#### **1.7 Copy of Plan Certification**

A copy of the plan certification is presented in Section 4 of this document.

## 2. PLAN SUMMARY – Solvent Naphtha Medium Aliphatic

<b>Name and CASRN of Substance</b>	Solvent Naphtha Medium Aliphatic	64742-88-7
<b>Substances for which other plans have been prepared</b>	Ethyl Alcohol	64-17-5
	n-Butyl Acetate	123-86-4
	Methanol	67-56-1
	Propylene Glycol Methyl Ether Acetate	108-65-6
	Isopropyl Alcohol	67-63-0
	Light Aromatic Solvent Naphtha	64742-95-6
	Methyl Ethyl Ketone	78-93-3
	Methyl Isobutyl Ketone	108-10-1
	Solvent Naphtha Light Aliphatic	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 3 of this document.

### 2.2 Toxic Reduction Policy Statement of Intent

At Walters Inc., it is their policy to be environmentally responsible and limit the negative impact of their business activities as much as is reasonably possible. Walters Inc. is committed to environmentally responsible product design and manufacturing. The impact of manufacturing, through its processes, raw materials, waste generation and the alternative opportunities for products at the end of lifespan are of paramount concern. They are committed to continually improving in the areas of energy conservation, reduction of waste, reduction of hazardous substances, and reduction of water and air emissions.

Wherever feasible, Walters Inc. will reduce the use and release of Solvent Naphtha Medium Aliphatic 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.

### 2.3 Reduction Objectives

The reduction of toxic substance use, creation and releases is a priority for Walters Inc. forming part of their sustainability programs and environmental management systems. Based on currently available information and technologies, there are no technically and economically feasible reduction options currently available for this substance. However, Walters Inc. will continue to investigate potential options as they arise as part of their sustainability programs.

## **2.4 Description of Substance**

Solvent Naphtha Medium Aliphatic is mainly used as an ingredient to assist in reducing the viscosity of the paint products prior to application on the structural steel components. A wide variety of dimensional steel is coated in any of the three paint centres. Top coat paints are applied via air assisted airless technology (AAAS). AAAS technology is used due to the large surface area and necessity to transfer a large volume of material to the parts that require coverage. It should be noted that depending upon the customer's quality requirement, coatings can range from one single coat to multiple coats. Solvent Naphtha Medium Aliphatic is primarily released during this application process.

## **2.5 Toxic Substance Reduction Option to be Implemented**

There are currently no options that have been determined to be both technically and economically feasible. Walters Inc. will continue to explore and investigate potential options as they arise as part of their commitment to environmental stewardship and sustainability.

## **2.6 Plan Summary Statement**

This plan accurately reflects the content of the toxic substance reduction plan for Solvent Naphtha Medium Aliphatic, prepared on behalf of Walters Inc., dated December 10, 2018.

## **2.7 Copy of Plan Certification**

A copy of the plan certification is presented in Section 4 of this document.

### 3. BASIC FACILITY INFORMATION

Facility Identification and Site Address		
Company Name	Walters Inc.	
Facility Name	Princeton Operations	
Facility Address	Physical Address:	Mailing Address
	30 Brentwood Drive Princeton ON NOJ 1V0	30 Brentwood Drive Princeton ON NOJ 1V0
Spatial Coordinates (UTM)	539234 (Easting)	4776014 (Northing)
Datum	WGS84	
Number of Employees	78 (Full time equivalents)	
NPRI ID	7366	
ON MOE ID	-	
Parent Company Information		
Parent Company Name & Address	Not Applicable	
Percent Ownership		
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 Manufacturing	
4 Digit NAICS Code	3323 - Architectural and structural materials manufacturing	
6 Digit NAICS Code	332319 - Other plate work and fabricated structural product manufacturing	
Company Contact Information		
Facility Public Contact	Simon Kranendonk Director Quality Assurance	Contact Address
	<a href="mailto:SKranendonk@waltersinc.com">SKranendonk@waltersinc.com</a>	Walters Inc.
	Phone: (905) 388-7111	1318 Rymal Road East
	Fax: (905) 575-7747	Hamilton ON L8W 3N1

#### 4. COPY OF PLAN CERTIFICATION

##### **Certification by the Highest Ranking Employee**

As of December 14, 2018, I, John Vanderhorst, 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:

Ethyl Alcohol

Solvent Naphtha Medium Aliphatic



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John Vanderhorst  
Plant Manager  
Walters Inc. – Princeton Plant

##### **Certification by Licensed Planner**

As of December 14, 2018, I, Tim Logan certify that I am familiar with the processes at the Walters Inc. Princeton facility 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 10, 2018 and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Ethyl Alcohol

Solvent Naphtha Medium Aliphatic



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