

# Toxic Substance Reduction Plan Summary

for

## **Naphthalene**

**(CAS No. 91-20-3)**

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

Table of Contents

Table of Contents..... 2

Toxic Substance Plan Statement..... 3

Toxic Substance Plan Summary and Certification..... 3

    Toxic Reduction Policy Statement of Intent ..... 4

    Reduction Objectives ..... 4

    Description of Substances..... 4

    Toxic Substance Reduction Option to be Implemented ..... 4

    Plan Summary Statement ..... 5

    Certification by Highest Ranking Employee..... 6

    Certification by Licensed Planner ..... 6

## 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 Naphthalene at the facility. One (1) reduction option was identified for the Equipment or Process Modification category. Vulsay estimates on average the facility will overfill each container by 0.5% to ensure that the minimum label claim is reached.

This option will require Vulsay staff to conduct a statistical study to determine the accuracy of filling equipment. This data will provide guidance in developing and implementing improved set-up procedures to minimize overfill. This reduction option has the potential to lower usage of Naphthalene by up to 0.5%.

Vulsay has assessed this reduction option and found it to be technically and economically feasible.

## Toxic Substance Plan Summary and Certification

<b>Company Name:</b>	Vulsay Industries Ltd.	<b>Parent Company:</b>	Greif Bros. Canada Inc.
<b>Address:</b>	35 Regan Road, Brampton L7A 1B2	<b>Address:</b>	370-380 Millen Rd. Stoney Creek, Ontario L8E 2H5
<b>Number of Employees</b>	60	<b>UTM Spatial Coordinates</b>	596189 E, 4839819 N (Zone 17)
<b>NAICS Code</b>	325999	<b>NPRI ID #</b>	3599
		<b>Ontario MOE ID #</b>	NA
<b>Facility Public Contact Position</b>	Geoff Kilburn General Manager		
<b>Phone #:</b>	(905) 495-5128	<b>Email</b>	<a href="mailto:Geoff.Kilburn@deltacogroup.com">Geoff.Kilburn@deltacogroup.com</a>
<b>Toxic Substances</b>	<b>CAS#</b>		
Naphthalene	91-20-3		

## **Toxic Reduction Policy Statement of Intent**

Naphthalene (a Phase 1 toxic substance) is currently used by Vulsay in production processes. Vulsay intends to reduce the use of this toxic substance at the facility where possible. This facility does not create Naphthalene; 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 Phase 1 toxic substance Naphthalene. 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 Phase 1 Toxic Substance Naphthalene is used at the facility as sub-component contained in pre-blended compounds which are used as formulants in preparing diesel fuel additives products (e.g. Cleaner; Conditioner and Antigal) for passenger and commercial vehicles as well as Electrical Insulating Oil.

In the calendar year of 2014, Vulsay used 14.854 tonnes of Naphthalene in the processes at the facility. This was the first year in which Vulsay exceeded the threshold (10 tonnes) 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.

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

Vulsay has identified One (1) reduction option for the Equipment or Process Modification category involving the Packaging stage of their process.

This option will require Vulsay staff to conduct a statistical study to determine the accuracy of filling equipment. This data will provide guidance in developing and implementing improved set-up procedures to minimize overfill.

## 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 Naphthalene at the facility. One (1) reduction option was deemed to be technically and economically feasible.

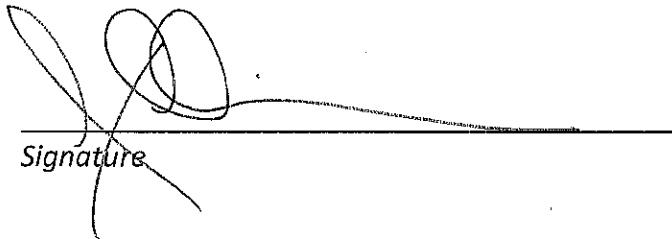
This option will require Vulsay staff (1) to conduct a statistical study of production filling equipment to determine the accuracy of product filling. Implementation of this option will result in a reduction in the use of Naphthalene by up to 0.063 tonnes (0.5%)

### Certification by Highest Ranking Employee

As of December 8, 2015, 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:

Naphthalene

  
\_\_\_\_\_  
Signature

December 8, 2015

### Certification by Licensed Planner

As of December 8, 2015, 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:

Naphthalene – Plan Dated December 8<sup>th</sup>, 2015



\_\_\_\_\_  
December 8, 2015

Stan Taylor, BSc  
Toxic Substance Reduction Planner, TRSP0290  
Taylor Environmental & Safety Solutions  
o/o Taylor McDonald Consulting Group Inc.