

Toxic Substance Reduction Plan Summary

for

1,2,4 - Trimethylbenzene

(CAS No. 95-63-6)

Prepared for:

Vulsay Industries Ltd.

35 Regan Road
Brampton, Ontario
L7A 1B2

Prepared By:

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o/o Taylor McDonald Consulting Group Inc.

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L6Y 1H8

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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 1,2,4 - Trimethylbenzene 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 setup procedures to minimize overfill. This reduction option has the potential to lower usage of 1,2,4 - Trimethylbenzene 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

Company Name:	Vulsay Industries Ltd.	Parent Company:	Greif Bros. Canada Inc.
Address:	35 Regan Road, Brampton L7A 1B2	Address:	370-380 Millen Rd. Stoney Creek, Ontario L8E 2H5
Number of Employees	60	UTM Spatial Coordinates	596189 E, 4839819 N (Zone 17)
NAICS Code	325999	NPRI ID #	3599
		Ontario MOE ID #	NA
Facility Public Contact	Geoff Kilburn		
Position	General Manager		
Phone #:	(905) 495-5128	Email	Geoff.Kilburn@deltacogroup.com
Toxic Substances	CAS#		
1,2,4 - Trimethylbenzene	95-63-6		

Toxic Reduction Policy Statement of Intent

1,2,4 - Trimethylbenzene (a Phase 2 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 1,2,4 - Trimethylbenzene; 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 1,2,4 - Trimethylbenzene. 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 2 Toxic Substance 1,2,4 - Trimethylbenzene 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.

In the calendar year of 2014, Vulsay used 107.254 tonnes of 1,2,4 - Trimethylbenzene 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 setup 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 1,2,4 - Trimethylbenzene at the facility. One (1) reduction option was deemed to be technically and economically feasible.

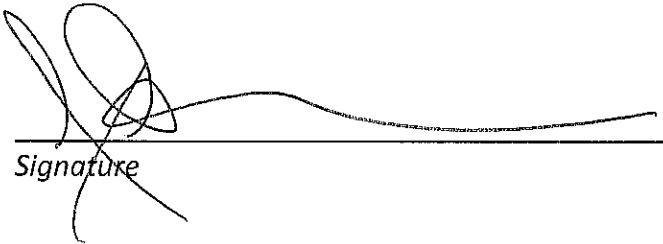
This option will require Vulsay staff (1) to conduct a statistical study of production filling equipment to determine the accuracy of product filling. Implementation of this option will result in a reduction in the use of 1,2,4 - Trimethylbenzene by up to 0.537 tonnes (0.5%).

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:

1,2,4 - Trimethylbenzene



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:

1,2,4 - Trimethylbenzene – Plan Dated December 8th, 2015



December 8, 2015

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