Plan Summary Preview					
Company Details					
Company Legal Name:					
Home Hardware Stores Ltd.					
Company Address:					
34 Henry Street West, St. Jacobs (Ontario)					
Report Details					
Facility:					
Paint & Home Products Division					
Facility Address:					
6 Brian Drive, Burford (Ontario)					
Update Comments:					
Activities					
Facility Contacts					
Facility Contacts					
Public Contact:*					
Darrin Noble					
Highest Ranking Employee:					
Darrin Noble					
Person responsible for preparing the toxic substance re	eduction plan:				
Philip Yu					
Organization Validation					
Company and Parent Company Inform	nation				
Company Details					
Company Legal Name:*	Home Hardware Stores Ltd.				
Company Trade Name:* Home Hardwre Stores Ltd.					

Business Number:*	102386828
Mailing Address	
Delivery Mode:	General Delivery
PO Box	
Rural Route Number	
Address Line 1	34 Henry Street Street
City*	St. Jacobs
Province/Territory**	Ontario
Postal Code:**	N0B 2N0
Physical Address	
Address Line 1	34 Henry Street West
City	St. Jacobs
Province/Territory	Ontario
Postal Code	N0B 2N0
Additional Information	
Land Survey Description	
National Topographical Description	
Parent Companies	
Facility Validation	
Facility Information	
Facility:*	Paint & Home Products Division
NAICS Id:*	325510
NPRI Id:*	000000393
ON Reg 127/01 ld:	6530

Mailing Address Delivery Mode: **General Delivery** PO Box Rural Route Number Address Line 1 City* Burford Province/Territory** Ontario Postal Code:** N0E1A0 **Physical Address** Address Line 1 6 Brian Drive City Burford Province/Territory Ontario Postal Code N0E1A0 **Additional Information** Land Survey Description National Topographical Description **Geographical Address** Latitude 43.09670 Longitude -80.43110 UTM Zone** 17 UTM Easting** 546297 UTM Northing** 4771710

Contact Validation

Environment Canada Contacts **Public Contact:** First Name:* Darrin Last Name:* Noble Position:* General Manager Telephone:* 5194491381 Ext: 3250 Fax: Email:* darrin.noble@homehardware.ca **Mailing Address Delivery Mode: General Delivery** PO Box Rural Route Number Address Line 1 City* **Burford** Province/Territory** Ontario Postal Code:** N0E1A0 Highest Ranking Employee: First Name:* Darrin

Last Name:*	Noble	
Position:*	General Manager	

Telephone:* 5194491381

Ext: 3250

Fax:

Email:*	darrin.noble@homehardware.ca		
Mailing Address			
Delivery Mode:	General Delivery		
PO Box			
Rural Route Number			
Address Line 1			
City*	Burford		
Province/Territory**	Ontario		
Postal Code:**	N0E1A0		
Person responsible for the Toxic Sub-	stance Reduction Plan preparation:		
First Name:*	Philip		
Last Name:*	Yu		
Position:*	Contractor		
Telephone:*	9054546920		
Ext:			
Fax:	9054546988		
Email:*	philip.yu@ccc-group.com		
Mailing Address			
Delivery Mode:	General Delivery		
PO Box			
Rural Route Number			
Address Line 1			

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City*	Mississauga
Province/Territory**	Ontario
Postal Code:**	L5T0A3
Employees	
Employees	
Number of Full-time Employees:*	
98	
Substances	
64742-47-8, Hydrotreated light distillate	ate
Substances Section Data	
Statement of Intent	
Use	
Does the plan include a statement that stipulates the c substance at their facility?*	owner or operator's intent to use less of this toxic
Yes	
If 'yes', provide the exact statement of intent:**	
Home Hardware Stores Limited, Paint & Home Production protecting the environment. Wherever feasible, we (Hydrotreated light distillate) in full compliance with all be an ongoing effort at Home Hardware Stores Limited continue to monitor technological advancements and technically and economically feasible are implemented.	will eliminate or reduce the use of MS#2 applicable regulations. Toxic substance reduction will d, Paint & Home Products Division, and we will market conditions to ensure that options that are both
If 'no', what rationale is specified in the plan for not usi	ng less of this substance?**
Creation	
Does the plan include a statement that stipulates the c substance at their facility?*	owner or operator's intent to create less of this toxic
No	
If 'yes', provide the exact statement of intent:**	

If 'no', what rationale is specified in the	he plan for not c	reating less of this	substance?:**	
This facility does not create Hydrotre	eated light distilla	ate.		
Objectives, Targets and [Description			
Plan Objectives				
Objectives in plan:*				
Home Hardware Stores Limited, Pair effectiveness of its products. Over the Division has eliminated/reduced MS reformulation. Efforts will continue to distillate) use in our facility as opport technically and economically feasible	ne past years, Ho #2 (Hydrotreated be made in the tunities arise. Ar	ome Hardware Stor d light distillate) use future to eliminate by such items and e	es Limited, Paint & Home Prod in some of its products through or reduce MS#2 (Hydrotreated limination/reduction, where	n light
Toxic Substance Use Tar	gets			
Reduction target:*				
		Quantity	Unit	
☑ No target	or			
Timeframe target:*				
⊠ No target	or		years	
Description of use targets:				
Toxic Substance Creation	n Targets			
Reduction target:*				
		Quantity	Unit	
☑ No target	or			
Timeframe target:*				
⊠ No target	or		years	
Description of creation targets:				

Reasons for Usir	na this		Substance
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This substance is used at the facility:*

As a formulation component

Summarize why this substance is used at the facility:**

It is a key ingredient in aerosol paints manufactured at Home Hardware Stores Limited, Paint & Home Products Division.

Reasons for Creating this Toxic Substance

This substance is created at the facility:*

This substance is not created at the facility

Summarize why this substance is created at the facility:**

Toxic Reduction Options for Implementation

Toxic substance reduction option(s) to be implemented:

Does the plan specify that no toxic reduction option will be implemented?*

Yes

If 'No', record the option(s) under the appropriate categories below (e.g., Materials or feedstock substitution; Product design or reformulation). If 'Yes', explain why no option will be implemented:**

No option is to be implemented.

There are no direct substitutions for MS#2 (Hydrotreated light distillate) that are suitable and non-toxic for the purpose of the substance in the products manufactured in this facility. No options are identified in this category.

MS#2 (Hydrotreated light distillate) solvent uses is expected to reduce through reformulation with water based emulsion technology. No options were identified under this category at this time.

MS#2 (Hydrotreated light distillate) is part of the final products and the solvent used to ensure final product and process effectiveness. Changes in equipment or processes used to manufacture these products will not result in the reduction of MS#2 (Hydrotreated light distillate) use and its required contents in the finished products, hence the quantity used for manufacturing. No options to reduce use of MS#2 (Hydrotreated light distillate) are identified.

Due to the nature of the business and the products being handled and manufactured in this facility, a spill & leak prevention program is in place. The company is committed to providing a safe environment to its community and its employees. There were no reportable spills involving MS#2 (Hydrotreated light distillate) in 2012. Significant investments in storm water management and spill containment have been made to safeguard the environment and to ensure the facility meets all municipal and provincial requirements. No additional options were identified for spill & leak prevention.

MS#2 (Hydrotreated light distillate) solvent used to clean the aerosol paint mixing vessel is collected for use in future batches. This practice has been in place for a number of years. No additional options are identified under this category.

MS#2 (Hydrotreated light distillate) as a solvent and raw materials containing MS#2 (Hydrotreated light distillate) used in this facility do not have finite shelf life and storing them in the bulk storage tank and in the warehouse over a reasonable period of storage time has no impact on the quality of the products. Changes in inventory management and purchasing method will not result in reduction of MS#2 (Hydrotreated light distillate) and MS#2 (Hydrotreated light distillate) and MS#2 (Hydrotreated light distillate) and MS#2 (Hydrotreated light distillate) containing

Employee training in MS#2 (Hydrotreated light distillate) and MS#2 (Hydrotreated light distillate) containing raw material handling has been in place since the inception of the processes involving this material. These include relevant Standard Operating Procedures and WHMIS training. This training is regularly conducted per company policy and applicable legal requirements. As there are no additional options identified in this plan, no additional training requirements are identified for implementation.

Materials or feedstock substitution
Product design or reformulation
Equipment or process modifications
Spill or leak prevention
On-site reuse, recycling or recovery
Improved inventory management or purchasing techniques
Good operator practice or training
Rationale for choosing these options for implementation:
Summary of actions undertaken outside of the plan to reduce the use and creation of this toxic substance at the facility:
License number of the toxic substance reduction planner who made the recommendations for this substance (format TSRPXXXX):*
TSRP0008

License number of the toxic substance reduction planner who certified the plan for this substance (format TSRPXXXX):*
TSRP0008
Which version of the plan is reflected in this summary?*
New Plan
64742-88-7, Solvent naphtha medium aliphatic
64742-88-7, Solvent naphtha medium aliphatic
Substances Section Data
Statement of Intent
Use
Does the plan include a statement that stipulates the owner or operator's intent to use less of this toxic substance at their facility?*
Yes
If 'yes', provide the exact statement of intent:**
Home Hardware Stores Limited, Paint & Home Products Division is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of MS#1 (Solvent naphtha medium aliphatic) in full compliance with all applicable regulations. Toxic substance reduction will be an ongoing effort at Home Hardware Stores Limited, Paint & Home Products Division, and we will continue to monitor technological advancements and market conditions to ensure that options that are both technically and economically feasible are implemented at this facility.
If 'no', what rationale is specified in the plan for not using less of this substance?**
Creation
Does the plan include a statement that stipulates the owner or operator's intent to create less of this toxic substance at their facility?*
No
If 'yes', provide the exact statement of intent:**
If 'no', what rationale is specified in the plan for not creating less of this substance?:**
This facility does not create Solvent naphtha medium aliphatic.
Objectives, Targets and Description
Plan Objectives

Objectives in plan:*

Home Hardware Stores Limited, Paint & Home Products Division prides itself on the quality and effectiveness of its products. Over the past years, Home Hardware Stores Limited, Paint & Home Products Division has eliminated/reduced MS#1 (Solvent naphtha medium aliphatic) use in some of its products through reformulation. Efforts will continue to be made in the future to eliminate or reduce MS#1 (Solvent naphtha medium aliphatic) use in our facility as opportunities arise. Any such items and elimination/reduction, where technically and economically feasible, will be implemented and captured in our future annual plan updates.

Toxic Substance Use Tar	9			
Reduction target:*		Quantity	Unit	
		Quantity	Onn	
⊠ No target	or			
Timeframe target:*				
⊠ No target	or		years	
Description of use targets:				
Toxic Substance Creation	Targets			
Reduction target:*				
U		Quantity	Unit	
☑ No target	or			
Timeframe target:*				
⊠ No target	or		years	
Description of creation targets:				
	xic Substa	ince		
Reasons for Using this To				
Reasons for Using this To This substance is used at the facility:				

Summarize why this substance is used at the facility:**

It is a key ingredient in aerosol paints and minimal ingredient in alkyd paints manufactured at Home Hardware Stores Limited, Paint & Home Products Division.

Reasons for Creating this Toxic Substance

This substance is created at the facility:*

This substance is not created at the facility

Summarize why this substance is created at the facility:**

Toxic Reduction Options for Implementation

Toxic substance reduction option(s) to be implemented:

Does the plan specify that no toxic reduction option will be implemented?*

Yes

If 'No', record the option(s) under the appropriate categories below (e.g., Materials or feedstock substitution; Product design or reformulation). If 'Yes', explain why no option will be implemented:**

No option is to be implemented.

There are no direct substitutions for MS#1 (Solvent naphtha medium aliphatic) that are suitable and non-toxic for the purpose of the substance in the products manufactured in this facility. No options are identified in this category.

MS#1 (Solvent naphtha medium aliphatic) solvent use is expected to reduce through reformulation with solvent uses is expected to reduce through reformulation with water based emulsion technology in time. No options are currently identified in this category.

MS#1 (Solvent naphtha medium aliphatic) is part of the final products and the solvent used to ensure final product and process effectiveness. Changes in equipment or processes used to manufacture these products will not result in the reduction of MS#1 (Solvent naphtha medium aliphatic) use and its required contents in the finished products, hence the quantity used for manufacturing. No options to reduce use of MS#1 (Solvent naphtha medium aliphatic) are identified.

Due to the nature of the business and the products being handled and manufactured in this facility, a spill & leak prevention program is in place. The company is committed to providing a safe environment to its community and its employees. There were no reportable spills involving MS#1 (Solvent naphtha medium aliphatic) in 2012. Significant investments in storm water management and spill containment have been made to safeguard the environment and to ensure the facility meets all municipal and provincial requirements. No additional options were identified for spill & leak prevention.

MS#1 (Solvent naphtha medium aliphatic) solvent used to clean the aerosol paint mixing vessel is collected for use in future batches. This practice has been in place for a number of years. No additional options are identified under this category.

MS#1 (Solvent naphtha medium aliphatic) as a solvent and raw materials containing MS#1 (Solvent naphtha medium aliphatic) used in this facility do not have finite shelf life, and storing them in the bulk storage tank and in the warehouse over a reasonable period of storage time has no impact on the quality of the products. Changes in inventory management and purchasing method will not result in reduction of MS#1 (Solvent naphtha medium aliphatic) and MS#1 (Solvent naphtha medium aliphatic) containing raw materials used or purchased.

Employee training in MS#1 (Solvent naphtha medium aliphatic) and MS#1 (Solvent naphtha medium aliphatic) containing raw material handling has been in place since the inception of the processes involving this material. These include relevant Standard Operating Procedures and WHMIS training. This training is regularly conducted per company policy and applicable legal requirements. As there are no additional options identified in this plan, no additional training requirements are identified for implementation.

Materials or feedstock substitution
Product design or reformulation
Equipment or process modifications
Spill or leak prevention
On-site reuse, recycling or recovery
Improved inventory management or purchasing techniques
Good operator practice or training
Rationale for choosing these options for implementation:
Summary of actions undertaken outside of the plan to reduce the use and creation of this toxic substance at the facility:
License number of the toxic substance reduction planner who made the recommendations for this substance (format TSRPXXXX):*
TSRP0008
License number of the toxic substance reduction planner who certified the plan for this substance (format TSRPXXXX):*
TSRP0008
Which version of the plan is reflected in this summary?*
New Plan
8052-41-3, Stoddard solvent
8052-41-3, Stoddard solvent
Substances Section Data
Statement of Intent
Use
Does the plan include a statement that stipulates the owner or operator's intent to use less of this toxic substance at their facility?*
Yes
If 'yes', provide the exact statement of intent:**

Home Hardware Stores Limited, Paint & Home Products Division is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of Stoddard solvent containing raw materials in full compliance with all applicable regulations. Toxic substance reduction will be an ongoing effort at Home Hardware Stores Limited, Paint & Home Products Division, and we will continue to monitor technological advancements and market conditions to ensure that options that are both technically and economically feasible are implemented at this facility.

If 'no', what rationale is specified in the	ne plan for not u	sing less of this su	bstance?**	
Creation				
Does the plan include a statement the substance at their facility?*	at stipulates the	owner or operator	's intent to create less of	this toxic
No				
If 'yes', provide the exact statement of	of intent:**			
If 'no', what rationale is specified in the	ne plan for not c	reating less of this	substance?:**	
This facility does not create Stoddard	d Solvent.			
Objectives, Targets and D	Description			
Plan Objectives				
Objectives in plan:*				
Home Hardware Stores Limited, Pair effectiveness of its products. Over th Division has eliminated/reduced Store through reformulation. Efforts will concuse in our facility as opportunities ari economically feasible, will be implementation.	e past years, Ho ddard solvent co ntinue to be mad se. Any such ite	ome Hardware Sto entaining raw mate de in the future to e ems and elimination	res Limited, Paint & Hom rials use in some of its pr eliminate or reduce Stodo n/reduction, where techni	ne Products roducts dard solvent
Toxic Substance Use Tar	gets			
Reduction target:*				
		Quantity	Unit	
☑ No target	or			
Timeframe target:*				
⊠ No target	or		years	
Description of use targets:				

	ation Targets	
Reduction target:*		
	Quantity	Unit
⊠ No target	or	
Timeframe target:*		
⊠ No target	or	years
Description of creation targets:	:	
This substance is used at the factorial As a formulation component Summarize why this substance	e is used at the facility:**	nd aerosol paints manufactured at
It is a key ingredient in colorar Home Hardware Stores Limite	ed, Paint & Home Products Division.	nd aerosor paints mandiactured at
Home Hardware Stores Limite	this Toxic Substance	nu derosor paints manufactured at
Reasons for Creating	this Toxic Substance	nu delosoi paints manufactureu at
Reasons for Creating	this Toxic Substance ne facility:*	nu derosor paints manufactured at
Reasons for Creating This substance is created at the	this Toxic Substance ne facility:* at the facility	nu derosor paints manufactured at
Home Hardware Stores Limite Reasons for Creating This substance is created at th This substance is not created Summarize why this substance	this Toxic Substance ne facility:* at the facility	nu derosor paints manufactured at
Reasons for Creating This substance is created at the This substance is not created Summarize why this substance Toxic Reduction Opti	this Toxic Substance ne facility:* at the facility e is created at the facility:**	

If 'No', record the option(s) under the appropriate categories below (e.g., Materials or feedstock substitution; Product design or reformulation).If 'Yes', explain why no option will be implemented:**

No option is to be implemented.

Colourants containing Stoddard solvent come from outside suppliers, who have to make their colourants compatible with a large variety of paint formulas from their various customers. The other competitive colourant suppliers use similar formulas, and would include similar solvents in their products. It is not economically feasible for us to purchase the equipment needed to make our own pigment dispersions using other solvents, so we have to rely on the outside suppliers to change their products if reducing the use of these solvents is necessary. Paint additives that contain Stoddard solvent are used in fairly small quantities in paint formulas. Their usage is critical to proper paint application properties under varying application conditions. Any alternatives would come from other additive suppliers, who are under similar performance constraints. They will still use solvents in their offsets, and would probably use the same solvent systems. The time that would have to be spent to evaluate alternatives would not be a cost effective use of time. No options are identified in this category.

Same as above.

Stoddard solvent is part of the final products and the solvent used to ensure final product and process effectiveness. Changes in equipment or processes used to manufacture these products will not result in the reduction of Stoddard solvent use and its required contents in the finished products, hence the quantity used for manufacturing. No options to reduce use of Stoddard solvent are identified.

Due to the nature of the business and the products being handled and manufactured in this facility, a spill & leak prevention program is in place. The company is committed to providing a safe environment to its community and its employees. There were no reportable spills involving Stoddard solvent in 2012. Significant investments in storm water management and spill containment have been made to safeguard the environment and to ensure the facility meets all municipal and provincial requirements. No additional options were identified for spill & leak prevention.

No options were identified through product reuse and recycling.

Paint additives containing Stoddard solvent used in this facility do not have finite shelf life and storing them in the bulk storage tank and in the warehouse over a reasonable period of storage time has no impact on the quality of the products. Changes in inventory management and purchasing method will not result in reduction of Stoddard solvent containing raw materials used or purchased.

Employee training in Stoddard solvent containing raw material handling has been in place since the inception of the processes involving this material. These include relevant Standard Operating Procedures and WHMIS training. This training is regularly conducted per company policy and applicable legal requirements. As there are no additional options identified in this plan, no additional training requirements are identified for implementation.

Materials or feedstock substitution
Product design or reformulation
Equipment or process modifications
Spill or leak prevention
On-site reuse, recycling or recovery
Improved inventory management or purchasing techniques
Good operator practice or training
Rationale for choosing these options for implementation:
Summary of actions undertaken outside of the plan to reduce the use and creation of this toxic substance at the facility:

License number of the toxic substance reduction planner who made the recommendations for this substance (format TSRPXXXX):*

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	. `	ĸ	\mathbf{P}		u	u	М

License number of the toxic substance reduction planner who certified the plan for this substance (format TSRPXXXX):*

TSRP0008

Which version of the plan is reflected in this summary?*

New Plan

107-21-1, Ethylene glycol

107-21-1, Ethylene glycol

Substances Section Data

Statement of Intent

Use

Does the plan include a statement that stipulates the owner or operator's intent to use less of this toxic substance at their facility?*

Yes

If 'yes', provide the exact statement of intent:**

Home Hardware Stores Limited, Paint & Home Products Division is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of Ethylene glycol in full compliance with all applicable regulations. Toxic substance reduction will be an ongoing effort at Home Hardware Stores Limited, Paint & Home Products Division, and we will continue to monitor technological advancements and market conditions to ensure that options that are both technically and economically feasible are implemented at this facility.

If 'no', what rationale is specified in the plan for not using less of this substance?**

Creation

Does the plan include a statement that stipulates the owner or operator's intent to create less of this toxic substance at their facility?*

No

If 'yes', provide the exact statement of intent:**

If 'no', what rationale is specified in the plan for not creating less of this substance?:**

This facility does not create Ethylene Glycol.

Objectives, Targets and Description

Plan Objectives

Objectives in plan:*

Home Hardware Stores Limited, Paint & Home Products Division prides itself on the quality and effectiveness of its products. Over the past years, Home Hardware Stores Limited, Paint & Home Products Division has eliminated/reduced Ethylene glycol use in some of its products through reformulation. Efforts will continue to be made in the future to eliminate or reduce Ethylene glycol use in our facility as opportunities arise. Any such items and elimination/reduction, where technically and economically feasible, will be implemented and captured in our future annual plan updates.

Toxic Substance Use	e Targets			
Reduction target:*				
		Quantity	Unit	
⊠ No target	or			
Timeframe target:*				
⊠ No target	or		years	
Description of use targets:				
Toxic Substance Cre	eation Targets			
Reduction target:*				
_		Quantity	Unit	
⊠ No target	or			
Timeframe target:*				
⊠ No target	or		years	
Description of creation targets	:			

This substance is used at the facility:*

Reasons for Using this Toxic Substance

As a formulation component

Summarize why this substance is used at the facility:**

Ethylene glycol is used primarily as an antifreeze agent that provided freeze thaw stability to finished good. It is a primary active coupled with corrosion inhibitors to formulate automotive antifreeze and radiator coolant at Home Hardware Stores Limited, Paint & Home Products Division.

Reasons for Creating this Toxic Substance

This substance is created at the facility:*

This substance is not created at the facility

Summarize why this substance is created at the facility:**

Toxic Reduction Options for Implementation

Toxic substance reduction option(s) to be implemented:

Does the plan specify that no toxic reduction option will be implemented?*

Yes

If 'No', record the option(s) under the appropriate categories below (e.g., Materials or feedstock substitution; Product design or reformulation). If 'Yes', explain why no option will be implemented:**

No option is to be implemented.

There are no direct substitutions for ethylene glycol that are suitable and non-toxic for the purpose of the substance in the products manufactured in this facility. No options are identified in this category. Propylene glycol is also used for freeze / thaw stability in our latex paints. Propylene glycol is not as effective as ethylene glycol at providing this stability and it would not be a one to one replacement. More propylene glycol, which is also a VOC, would need to be used and could push the quantity over regulated limits. There are additives that improve freeze / thaw stability but there are detriments to the film and the finished product cannot meet stability specification with them. No further options are identified under this category at this time.

Ethylene glycol is part of the final products that ensures final product and process effectiveness. Changes in equipment or processes used to manufacture these products will not result in the reduction of ethylene glycol use and its required contents in the finished products, hence the quantity used for manufacturing. No options to reduce use of ethylene glycol are identified.

Due to the nature of the business and the products being handled and manufactured in this facility, a spill & leak prevention program is in place. The company is committed to providing a safe environment to its community and its employees. There were no reportable spills involving ethylene glycol in 2012. Significant investments in storm water management and spill containment have been made to safeguard the environment and to ensure the facility meets all municipal and provincial requirements. No additional options were identified for spill & leak prevention.

No options under product reuse and recycling are identified.

Ethylene glycol does not have finite shelf life and storing them in the bulk storage tank and in the warehouse over a reasonable period of storage time has no impact on the quality of the products. Changes in inventory management and purchasing method will not result in reduction of ethylene glycol used or purchased.

Employee training in ethylene glycol handling has been in place since the inception of the processes involving this material. These include relevant Standard Operating Procedures and WHMIS training. This training is regularly conducted per company policy and applicable legal requirements. As there are no additional options identified in this plan, no additional training requirements are identified for implementation.

Materials or feedstock substitution
Product design or reformulation
Equipment or process modifications
Spill or leak prevention
On-site reuse, recycling or recovery
Improved inventory management or purchasing techniques
Good operator practice or training
Rationale for choosing these options for implementation:
Summary of actions undertaken outside of the plan to reduce the use and creation of this toxic substance at the facility:
License number of the toxic substance reduction planner who made the recommendations for this substance (format TSRPXXXX):*
TSRP0008
License number of the toxic substance reduction planner who certified the plan for this substance (format TSRPXXXX):*
TSRP0008
Which version of the plan is reflected in this summary?*
New Plan
84-74-2, Dibutyl phthalate
84-74-2, Dibutyl phthalate
Substances Section Data
Statement of Intent
Use
Does the plan include a statement that stipulates the owner or operator's intent to use less of this toxic substance at their facility?*
Yes
If 'yes', provide the exact statement of intent:**

Home Hardware Stores Limited, Paint & Home Products Division is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of Dibutyl phthalate in full compliance with all applicable regulations. Toxic substance reduction will be an ongoing effort at Home Hardware Stores Limited, Paint & Home Products Division, and we will continue to monitor technological advancements and market conditions to ensure that options that are both technically and economically feasible are implemented at this facility.

If 'no', what rationale is specified in th	ne plan for not u	sing less of this su	ostance?**	
Creation				
Does the plan include a statement the substance at their facility?*	at stipulates the	owner or operator	s intent to create less of	this toxic
No				
If 'yes', provide the exact statement o	of intent:**			
If 'no', what rationale is specified in th	ne plan for not c	reating less of this	substance?:**	
This facility does not create Dibutyl P	hthalate.			
Objectives, Targets and D	Description			
Plan Objectives				
Objectives in plan:*				
Home Hardware Stores Limited, Pair effectiveness of its products. Over the Division has eliminated/reduced Dibu will continue to be made in the future opportunities arise. Any such items a will be implemented and captured in	e past years, Houtyl phthalate useto eliminate or and eliminate or and elimination/r	ome Hardware Sto e in some of its pro reduce Dibutyl pht eduction, where te	res Limited, Paint & Homo ducts through reformulate nalate use in our facility a	tion. Efforts
Toxic Substance Use Tar	gets			
Reduction target:*				
		Quantity	Unit	
☑ No target	or			
Timeframe target:*				
No target	or		years	
Description of use targets:				

	ation Targets	
Reduction target:*		
	Quantity	Unit
☑ No target	or	
Timeframe target:*		
⊠ No target	or	years
Description of creation targets	:	
Reasons for Using the This substance is used at the the As a formulation component		
Summarize why this substance	•	
Dibutyl phthalate is a key ingre	edient in sealants manufactured at Ho	me Hardware Stores Limited, Paint &
Home Products Division.		
Home Products Division.	g this Toxic Substance	
Home Products Division. Reasons for Creating		
Reasons for Creating	ne facility:*	
Home Products Division. Reasons for Creating This substance is created at the This substance is not created	ne facility:* at the facility	
Home Products Division. Reasons for Creating This substance is created at the This substance is not created	ne facility:* at the facility	
Home Products Division. Reasons for Creating This substance is created at the This substance is not created Summarize why this substance	ne facility:* at the facility	
Reasons for Creating This substance is created at the This substance is not created Summarize why this substance Toxic Reduction Opti	at the facility e is created at the facility:**	emented:

If 'No', record the option(s) under the appropriate categories below (e.g., Materials or feedstock substitution; Product design or reformulation).If 'Yes', explain why no option will be implemented:**

No option is to be implemented.

Have had meetings with raw material suppliers and some suggestions have been made (tributyl citrate, polyester adipate, long chain oligimer) as possible replacements. However, this is formulation specific and each chemistry level needs to be determined. Initial pricing is 50% higher for possible alternatives. No options were identified under this category at this time.

Alternatives to dibutyl phthalate in sealant paint formulas would have to pass both long and short term shelf stability in ambient, heat and freeze/thaw conditions. Application properties need to be maintained for extrusion rate, dirt pick up, tool ability, slump, tack free time and channel cracking. Performance criteria needs to be maintained with respect to wet and dry peel adhesion, tensile properties, volume shrinkage, cold temperature flexibility, extension/recovery and % adhesion loss. All these properties need to be achieved within the current cost constraints. No options were identified under this category.

Dibutyl phthalate is part of the final products to ensure final product and process effectiveness. Changes in equipment or processes used to manufacture these products will not result in the reduction of dibutyl phthalate use and its required contents in the finished products, hence the quantity used for manufacturing. No options were identified under this category.

Due to the nature of the business and the products being handled and manufactured in this facility, a spill & leak prevention program is in place. The company is committed to providing a safe environment to its community and its employees. There were no reportable spills involving dibutyl phthalate in 2012. Significant investments in storm water management and spill containment have been made to safeguard the environment and to ensure the facility meets all municipal and provincial requirements. No additional options were identified for spill & leak prevention.

Dibutyl phthalate used in this facility do not have finite shelf life and storing them in the bulk storage tank and in the warehouse over a reasonable period of storage time has no impact on the quality of the products. Changes in inventory management and purchasing method will not result in reduction of dibutyl phthalate used or purchased.

Employee training in dibutyl phthalate handling has been in place since the inception of the processes involving this material. These include relevant Standard Operating Procedures and WHMIS training. This training is regularly conducted per company policy and applicable legal requirements. As there are no additional options identified in this plan, no additional training requirements are identified for implementation.

Materials or feedstock substitution
Product design or reformulation
Equipment or process modifications
Spill or leak prevention
On-site reuse, recycling or recovery
Improved inventory management or purchasing techniques
Good operator practice or training
Rationale for choosing these options for implementation:
Summary of actions undertaken outside of the plan to reduce the use and creation of this toxic substance at the facility:
License number of the toxic substance reduction planner who made the recommendations for this substance (format TSRPXXXX):*
TSRP0008

License number of the toxic substance reduction planner who certified the plan for this substance (format TSRPXXXX):*
TSRP0008
Which version of the plan is reflected in this summary?*
New Plan
67-64-1, Acetone
67-64-1, Acetone
Substances Section Data
Statement of Intent
Use
Does the plan include a statement that stipulates the owner or operator's intent to use less of this toxic substance at their facility?*
Yes
If 'yes', provide the exact statement of intent:**
Home Hardware Stores Limited, Paint & Home Products Division is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of Acetone in full compliance with all applicable regulations. Toxic substance reduction will be an ongoing effort at Home Hardware Stores Limited, Paint & Home Products Division, and we will continue to monitor technological advancements and market conditions to ensure that options that are both technically and economically feasible are implemented at this facility.
If 'no', what rationale is specified in the plan for not using less of this substance?**
Creation
Does the plan include a statement that stipulates the owner or operator's intent to create less of this toxic substance at their facility?*
No
If 'yes', provide the exact statement of intent:**
If 'no', what rationale is specified in the plan for not creating less of this substance?:**
This facility does not create Acetone.
Objectives, Targets and Description
Plan Objectives

Objectives in plan:*

Home Hardware Stores Limited, Paint & Home Products Division prides itself on the quality and effectiveness of its products. Over the past years, Home Hardware Stores Limited, Paint & Home Products Division has eliminated/reduced Acetone use in some of its products through reformulation. Efforts will continue to be made in the future to eliminate or reduce Acetone use in our facility as opportunities arise. Any such items and elimination/reduction, where technically and economically feasible, will be implemented and captured in our future annual plan updates.

jets			
	Quantity	Unit	
or			
or		years	
Targets			
	Quantity	Unit	
or			
or		years	
xic Substa	ance		
	or or Targets or	Quantity or Targets Quantity or	Quantity Unit or years Targets Or Unit Or years

Summarize why this substance is used at the facility:**

Aerosol products need a propellant to spray the product out of the can. Therefore, acetone is a key ingredient in aerosol paints manufactured at Home Hardware Stores Limited, Paint & Home Products Division.

Reasons for Creating this Toxic Substance

This substance is created at the facility:*

This substance is not created at the facility

Summarize why this substance is created at the facility:**

Toxic Reduction Options for Implementation

Toxic substance reduction option(s) to be implemented:

Does the plan specify that no toxic reduction option will be implemented?*

Yes

If 'No', record the option(s) under the appropriate categories below (e.g., Materials or feedstock substitution; Product design or reformulation). If 'Yes', explain why no option will be implemented:**

No option is to be implemented.

There are no direct substitutions for acetone that are suitable and non-toxic for the purpose of the substance in the products manufactured in this facility. No options are identified in this category. Alternatives to acetone in aerosol paint formulas would have to have similar fast evaporation rates and solvency characteristics for the resins used in paint formulas. Also, the Canadian federal government has asked the aerosol paint industry to voluntarily follow the United States Maximum Incremental Reactivity (MIR) approach to reducing volatile organic compound (VOC) emissions. The MIR approach recognizes that certain VOCs create less ground level ozone, which is the precursor to smog. Acetone is a low MIR solvent that allows aerosol paint formulas to meet the MIR type VOC regulations. No options are identified in this category.

Acetone is part of the final products and the solvent used to ensure final product and process effectiveness. Changes in equipment or processes used to manufacture these products will not result in the reduction of acetone use and its required contents in the finished products, hence the quantity used for manufacturing. No options to reduce use of acetone are identified.

Due to the nature of the business and the products being handled and manufactured in this facility, a spill & leak prevention program is in place. The company is committed to providing a safe environment to its community and its employees. There were no reportable spills involving acetone in 2012. Significant investments in storm water management and spill containment have been made to safeguard the environment and to ensure the facility meets all municipal and provincial requirements. No additional options were identified for spill & leak prevention.

Acetone solvent used to clean the aerosol paint mixing vessel is collected for use in future batches. This practice has been in place for a number of years. No additional options are identified under this category. Acetone as a solvent used in this facility do not have finite shelf life and storing them in the bulk storage tank and in the warehouse over a reasonable period of storage time has no impact on the quality of the products. Changes in inventory management and purchasing method will not result in reduction of acetone used or purchased.

Employee training in acetone handling has been in place since the inception of the processes involving this material. These include relevant Standard Operating Procedures and WHMIS training. This training is regularly conducted per company policy and applicable legal requirements. As there are no additional options identified in this plan, no additional training requirements are identified for implementation.

Materials or feedstock substitution
Product design or reformulation
Equipment or process modifications
Spill or leak prevention
On-site reuse, recycling or recovery
Improved inventory management or purchasing techniques
Good operator practice or training
Rationale for choosing these options for implementation:
Summary of actions undertaken outside of the plan to reduce the use and creation of this toxic substance at the facility:
License number of the toxic substance reduction planner who made the recommendations for this substance (format TSRPXXXX):*
TSRP0008
License number of the toxic substance reduction planner who certified the plan for this substance (format TSRPXXXX):*
TSRP0008
Which version of the plan is reflected in this summary?*
New Plan

9. <u>Plan Certifications</u>:

9.1 Certification by Highest Ranking Employee:

As of December 11th, 2013, I, Darrin Noble, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and Ontario regulation 455/09 (General) made under the Act.

ACETONE

Name: Darrin Noble

Title: General Manager

Company: Home Hardware Stores Limited, Paint & Home Products Division

Date

9.2 Certification by licensed Planner:

As of December 11th, 2013, I, Philip Yu, certify that I am familiar with the processes at Home Hardware Stores Limited, Paint & Home Products Division in Burford Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 ii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 11th, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

ACETONE

Philip Yu (License# TSRP0008)

Consultant

Date

Dec. 11, 2013

9. <u>Plan Certifications</u>:

9.1 Certification by Highest Ranking Employee:

As of December 11th, 2013, I, Darrin Noble, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and Ontario regulation 455/09 (General) made under the Act.

DIBUTYL PHTHALATE

Name: Darrin Noble

Title: General Manager

Company: Home Hardware Stores Limited, Paint & Home Products Division

Date

9.2 Certification by licensed Planner:

As of December 11th, 2013, I, Philip Yu, certify that I am familiar with the processes at Home Hardware Stores Limited, Paint & Home Products Division in Burford Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 ii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 11th, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

DIBUTYL PHTHALATE

Philip Yy Kicense# TSRP0008)

Consultant

Date

9. Plan Certifications:

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As of December 11th, 2013, I, Darrin Noble, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and Ontario regulation 455/09 (General) made under the Act.

ETHYLENE GLYCOL

Name: Darrin Noble

Title: General Manager

Company: Home Hardware Stores Limited, Paint & Home Products Division

9.2 Certification by licensed Planner:

As of December 11th, 2013, I, Philip Yu, certify that I am familiar with the processes at Home Hardware Stores Limited, Paint & Home Products Division in Burford Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 ii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 11th, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

ETHYLENE GLYCOL

Philip Yu (License# TSRP0008)

Consultant

Date

9. Plan Certifications:

9.1 Certification by Highest Ranking Employee:

As of December 11th, 2013, I, Darrin Noble, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and Ontario regulation 455/09 (General) made under the Act.

Dec 11/13

Date

HYDROTREATED LIGHT DISTILLATE (MS#2)

Name: Darrin Noble

Title: General Manager

Company: Home Hardware Stores Limited, Paint & Home Products Division

9.2 Certification by licensed Planner:

As of December 11th, 2013, I, Philip Yu, certify that I am familiar with the processes at Home Hardware Stores Limited, Paint & Home Products Division in Burford Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 ii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 11th, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

HYDROTREATED LIGHT DISTILLATE (MS#2)

Philip Yu (License# TSRP0008)

Consultant

Date

Der. 11. 2013

9. <u>Plan Certifications</u>:

9.1 Certification by Highest Ranking Employee:

As of December 11th, 2013, I, Darrin Noble, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and Ontario regulation 455/09 (General) made under the Act.

MS#1 (Solvent naphtha medium aliphatic)

Name: Darrin Noble

Title: General Manager

Company: Home Hardware Stores Limited, Paint & Home Products Division

Date

9.2 Certification by licensed Planner:

As of December 11th, 2013, I, Philip Yu, certify that I am familiar with the processes at Home Hardware Stores Limited, Paint & Home Products Division in Burford Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 ii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 11th, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

MS#1 (Solvent naphtha medium aliphatic)

Philip Yu (License# TSRP0008)

Consultant

Date

Dec. 11. 2013

9. Plan Certifications:

9.1 Certification by Highest Ranking Employee:

As of December 11th, 2013, I, Darrin Noble, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and Ontario regulation 455/09 (General) made under the Act.

HYDROTREATED LIGHT DISTILLATE (MS#2)

Name: Darrin Noble

Title: General Manager

Company: Home Hardware Stores Limited, Paint & Home Products Division

Date

9.2 Certification by licensed Planner:

As of December 11th, 2013, I, Philip Yu, certify that I am familiar with the processes at Home Hardware Stores Limited, Paint & Home Products Division in Burford Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 ii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 11th, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

HYDROTREATED LIGHT DISTILLATE (MS#2)

Philip Yu (License# TSRP0008)

Consultant

Date

Der. 11, 2013