

## **Plan Summary - Toluene:**

### Facility Identification & Site Address:

Facility Name: Home Hardware Stores Limited,  
Paint & Home Products Division  
Facility Address: 6 Brian Drive, Burford, Ontario  
NPRI Identification Number: 0000000393  
Ontario MOE Identification Number: 6530  
Spatial Coordinates of Facility:  
▪ Latitude: 43.09670  
▪ Longitude: -80.43110  
Two (2) Digit NACIS Code: 32  
Four (4) Digit NACIS Code: 3255  
Six (6) Digit NACIS Code: 325510

### Parent Company (PC):

Name: Home Hardware Stores Limited, Paint & Home Products Division  
Address: 34 Henry St. W., St. Jacobs, Ontario N0B 2N0  
Percentage of facility owned by company: 100%  
Business number: 868388

### Facility Public Contact:

Name: Darrin Noble  
Position: General Manager  
Address: 6 Brian Drive, Burford, Ontario  
Phone Number: (519)-449-1381, Ext. 3250  
Fax Number: (519)-449-5789  
E-mail: darrin.noble@homehardware.ca

Number of full-time employees: 100 (2011)

### 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 toluene 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.

Objectives:

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 toluene use in some of its products through reformulation. Efforts will continue to be made in the future to eliminate or reduce toluene 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(s) for which this plan is required: Toluene (CAS# 108-88-3). It is a key ingredient in aerosol paints and minimal ingredient in alkyd paints manufactured at Home Hardware Stores Limited, Paint & Home Products Division.

There are no processes at this facility where Toluene is created.

No option is to be implemented:

- There are no direct substitutions for toluene 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.
- Toluene solvent use is expected to reduce through reformulation with acetone over the next 2 years so the quantities to be reduced is not known at this time. It also does not qualify as a reduction option because acetone is also a toxic substance under this regulation. Alkyd paint raw materials containing toluene have been discontinued in 2012 due to reformulations to meet the *VOC Concentration Limits for Architectural Coatings Regulations*. It is not technically feasible to reformulate the aerosol paints since they already meet the California VOC regulations that the Canadian government may adopt in the future.
- Toluene 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 toluene use and it's required contents in the finished products, hence the quantity used for manufacturing. No options to reduce use of toluene 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 toluene in 2011. 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.

- Toluene 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.
- Toluene as a solvent and raw materials containing toluene 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 toluene and toluene containing raw materials used or purchased.
- Employee training in toluene and toluene 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.

Additional Information:

This facility complies with all federal and provincial regulation to ensure that our products and practices safeguard the health and safety of our people, the community and the environment.

We fully support Canada's key regulatory legislation including:

- Canada's Chemical Management Plan - federal legislation that develops and implements measures to assess and manage the risks posed by certain substances to the health of Canadians and their environment to ensure the safety of products made and sold in Canada. The CMP leads the world in establishing the best practice for the assessment and safe formulation of substances.
- VOC Concentration Limits for Architectural Coatings Regulations 2009 - federal legislation that regulates the manufacture, distribution and sale of architectural coatings to ensure Canadian paint emissions are amongst the world's lowest.
- NPRI - legislation that requires facilities to fully report and manage emissions.
- Ontario MoE - regulations which ensure environmentally safe facility practices.
- CCCR 2001 - federal regulations under the Hazardous Products Act that govern hazard labeling warnings
- WHMIS - workplace labeling requirements and risk based hazard disclosure.

Recent significant facility initiatives include:

2005 - implemented containment areas for bulk storage of toluene and xylene

2011 - completion of Ontario MoE approved storm water retention and ground water management and filtration system

2012 - installation of receiving containment areas to ensure environmental and ground water protection per Ontario MoE guidelines.

This summary accurately reflects the contents of the toxic reduction plan for toluene, prepared on behalf of Home Hardware Stores Limited, Paints & Home Products Division, dated December 10<sup>th</sup>, 2012.

9. **Plan Certifications:**

9.1 Certification by Highest Ranking Employee:

As of December 10<sup>th</sup>, 2012, 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.

**Toluene**



Dec 10/12

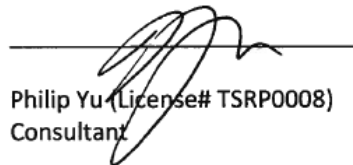
Name: Darrin Noble  
Title: General Manager  
Company: Home Hardware Stores Limited, Paint & Home Products Division

Date

9.2 Certification by licensed Planner:

As of December 10<sup>th</sup>, 2012, 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 1<sup>st</sup>, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

**Toluene**



Philip Yu (License# TSRP0008)  
Consultant

Dec 13, 2012

Date