Plan Summary - Zinc:

Facility Identification & Site Address:

Facility Name: Home Hardware Stores Limited, Paint & Home Products Division
Facility Address: 6 Brian Drive, Burford, Ontario NPRI Identification Number: 000000393
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 NOB 2NO 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 zinc 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 zinc use in some of its products through reformulation. Efforts will continue to be made in the future to eliminate or reduce zinc 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: Zinc. It is a key ingredient in select aerosol and alkyd paints manufactured at Home Hardware Stores Limited, Paints & Home Products Division. Products manufactured using zinc at this facility meet all regulatory requirements and are safe for use as directed.

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

No option is to be implemented:

- There are no direct substitutions for zinc 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.
- Zinc compounds in raw materials used at this facility are primarily as corrosion inhibitor and metallic pigments. There are no plans to reduce the use of raw materials, as there are no cost effective substitutes for these materials. Although some suppliers were pushing a non-zinc rust inhibitor, Home Hardware Stores Limited, Paints & Home Products Division has not tried any such products as yet. No additional options in the category have been identified at this time.
- Zinc is part of the paint 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 zinc use and it's required contents in the finished products, hence the quantity used for manufacturing. No options under this category are identified.
- There were no reportable spills involving Zinc at this facility in 2011. No options were identified for spill & leak prevention.
- No additional options are identified under this category.
- Zinc containing raw materials used in this facility do not have finite shelf life and storing them 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 zinc and zinc containing raw materials used or purchased.
- Employee training in zinc and zinc 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:

2000 - dust collection system implemented to filter air exhausted from the facility to capture airborne particulates including zinc.

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

9. Plan Certifications:

Certification by Highest Ranking Employee: 9.1

> As of December 10th, 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.

Zinc

Aec 10

Date:

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

9.2 Certification by licensed Planner:

> As of December 10th, 2012, I, Philip Yu, certify that I am familiar with the processes at Home Hardware Stores Limited, Paints & 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 1st, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

<u>Zinc</u>

nse# TSRP0008) Philip Yu Consultar

Per 13. 2012

Date:

December 10th, 2012

12/11/2012