



**Toxic Substance Reduction Plan Summary
For
n-Butyl acetate
Ethyl acetate
Methyl ethyl ketone
1,2,4-Trimethylbenzene
Ethylene glycol butyl ether acetate
Light aromatic solvent naphtha**

ABC INOAC Exterior Systems Inc.
220 Brockport Drive,
Toronto, ON M9W 5S1

Rev. 0
December 16, 2013

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1 INTRODUCTION

This Toxic Substance Reduction Plan has been prepared in accordance with Section 8(2) of Toxic Reduction Plan Act and satisfies the minimum plan summary requirement stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plans for the prescribed substances described as follows.

1.1 Substance information

Substance name and Chemical Abstracts Service Registry number	Methyl ethyl ketone (CAS# 78-93-3)
	n-Butyl acetate (CAS# 123-86-4)
	Ethyl acetate (CAS# 141-78-6)
	1,2,4-Trimethylbenzene (CAS# 95-63-6)
	Ethylene glycol butyl ether acetate (CAS# 112-07-2)
	Light aromatic solvent naphtha (CAS# 64742-95-6)

1.2 Facility Information

Facility Name	ABC INOAC Exterior Systems Inc.
Facility Address	220 Brockport Dr., Toronto, ON M9W 5S1
UTM Coordinates	43.70260N, -79.59070W; Zone 17
Number of Full Time Employees in 2012	407
NPRI Identification Number:	5914
Two Digit NAICS Code:	32
Four Digit NAICS Code:	3261
Six Digit NAICS Code:	326193
Public Contact	Bob Caughey
	Quality Manager & EMS Representative
	220 Brockport Dr., Toronto, ON M9W 5S1
	(416) 675-7480 ext. 334
Parent Company Information	
<i>Owner 1</i>	
Company Name	ABC Group (Canada) Limited
Company Address:	2 Norelco Dr., Toronto, ON M9L 2X6
Percentage of Ownership:	50%
<i>Owner 2</i>	
Company Name	INOAC Canada Limited (c/o Mr. Mark Stinson)
Company Address:	66 Wellington St. West, Toronto, ON M5K 1N6
Percentage of Ownership:	50%

1.3 Other Information

List all other substances for which plans have been prepared at the facility	Toluene (CAS# 108-88-3)
	Xylene (CAS#: 1330-20-7)
	Methanol (CAS# 67-56-1)

2 STATEMENT OF INTENT

As required by Section 4(1) of Toxic Reduction Act, a plan must include either a statement of the facility's intent to reduce the use and/or creation of the toxic substance at the facility, or the reasons for not including this statement.

ABC Group is committed to preventing and mitigating its adverse impacts on the environment. ABC INOAC Exterior Systems Inc. (the facility) has an Environmental Management System that is certified to ISO 14001. Environmental issues, objectives and targets are parts of Key Production Indicators monitored and reviewed through regular management meetings and communicated with employees. We understand toxic reduction will be an ongoing effort and will continually team up with our suppliers to eliminate or reduce the use/release of the toxic substances from the paint line, wherever feasible.

The purpose of the plans is to calculate and to identify options that would potentially reduce the use of the targeted Phase II substances as abovementioned.

3 OBJECTIVES OF THE PLANS, TARGETS AND TIMELINES

ABC INOAC Exterior Systems Inc. intends to reduce the use of

- Methyl ethyl ketone by 3.0% over a 5-year period;
- n-Butyl acetate by 3.5% over a 5-year period; and,
- Ethyl acetate by 5.0% over a 5-year period.

Based on the analysis of identified options, there is no specific goal available to be determined by ABC INOAC Exterior Systems Inc. at this time to reduce the use of

- 1,2,4-Trimethylbenzene;
- Ethylene glycol butyl ether acetate; or,
- Light aromatic solvent naphtha.

We are working closely with the paint supplier though to conduct further research to identify new reduction options, and meanwhile, we are committed to ensuring this substance is used in the most responsible and efficient manner.

4 USE/CREATION OF THE TOXIC SUBSTANCE

Toxic Substance	CAS No.	Description of Substance Use / Creation*
Methyl ethyl ketone	78-93-3	Use as a formulation component in paints and the purge solvent
n-Butyl acetate	123-86-4	Use as a formulation component in paints, the reducer, and the purge solvent
Ethyl acetate	141-78-6	Use as a formulation component in paints and the reducer
1,2,4-Trimethylbenzene	95-63-6	Use as a formulation component in paints
Ethylene glycol butyl ether acetate	112-07-2	Use as a formulation component in paints
Light aromatic solvent naphtha	64742-95-6	Use as a formulation component in paints

*No toxic substances are created.

5 OPTIONS TO BE IMPLEMENTED AND ESTIMATED REDUCTIONS

See details of options to be implemented and estimated reductions for Methyl ethyl ketone, n-Butyl acetate and Ethyl acetate, respectively, in the Table 1, 2 and 3 in the next page.

6 ADDITIONAL ACTIONS

Additional actions taken by the facility to reduce the toxic substance includes the followings:

- Keep good practices on Just-In-Time delivery of paints and solvents;
- Keep good spill prevention practices;
- Keep good practice on recycling and reuse of the purge solvent; and, especially,
- Increased the purge capturing device size in the bell color change in order to increase the reclaim of the purge solvent and reduce its release.

Table 5.1 Options to be Implemented and Estimated Reductions for Methyl ethyl ketone

Option to Be Implemented for Methyl ethyl ketone		Use		Creation tonnes	Contained in Products tonnes	Offsite Recycling		Released				Disposal	
		tonnes	%			tonnes	tonnes	%	Air (tonnes)	%	Water (tonnes)	Land (tonnes)	Onsite (tonnes)
Category: Equipment or Process Modification													
Option 4	Replace gear mixing equipment in base coating to have a better pump and mixer control	0.12	0.1%	0	0	0.02	0.0%	0.01	0.1%	0	0	0	0
Category: Training & Improved Operating Practices													
Option 6	Improve the painting schedule to reduce system flushes and color change	2.39	2.9%	0	0	1.63	3.0%	0.33	3.0%	0	0	0	0
Total Estimated Reduction		2.51	3.1%	0	0	1.65	3.0%	0.34	3.0%	0	0	0	0

Table 5.2 Options to be Implemented and Estimated Reductions for n-Butyl acetate

Option to Be Implemented for n-Butyl acetate		Use		Creation tonnes	Contained in Products tonnes	Offsite Recycling		Released				Disposal	
		tonnes	%			tonnes	tonnes	%	Air (tonnes)	%	Water (tonnes)	Land (tonnes)	Onsite (tonnes)
Category: Material or Feedstock Substitution													
Option N1	Primer/catalyst substitutes with less or no NBA	0.85	1.1%	0	0	0.07	0.8%	0.78	2.0%	0	0	0	0
Category: Equipment or Process Modification													
Option 3	Use high efficiency applicator in primer coating	0.85	1.1%	0	0	0.07	0.8%	0.78	2.0%	0	0	0	0
Option 4	Replace gear mixing equipment in base coating to have a better pump and mixer control	1.25	1.6%	0	0	0.20	2.2%	0.06	0.2%	0	0	0	0
Category: Training & Improved Operating Practices													
Option 6	Improve the painting schedule to reduce system flushes and color change	0.08	0.1%	0	0	0.05	0.6%	0.01	0.0%	0	0	0	0
Total Estimated Reduction		3.03	3.8%	0	0	0.38	4.3%	1.64	4.3%	0	0	0	0

Table 5.3 Options to be Implemented and Estimated Reductions for Ethyl acetate

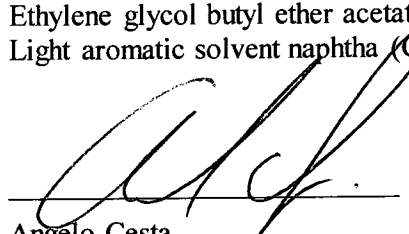
Option to Be Implemented for Ethyl Acetate		Use		Creation tonnes	Contained in Products tonnes	Offsite Recycling		Released				Disposal	
		tonnes	%			tonnes	tonnes	%	Air (tonnes)	%	Water (tonnes)	Land (tonnes)	Onsite (tonnes)
Category: Equipment or Process Modification													
Option 3	Use high efficiency applicator in primer coating	0.19	1.7%	0	0	0.01	1.0%	0.17	4.5%	0	0	0	0
Option 4	Replace gear mixing equipment in base coating to have a better pump and mixer control	0.37	3.3%	0	0	0.06	4.0%	0.02	0.5%	0	0	0	0
Total Estimated Reduction		0.56	5.0%	0	0	0.07	5.0%	0.19	5.0%	0	0	0	0

CERTIFICATIONS OF PLANS

Certification by Highest Ranking Employee

As of December 16, 2013, I, Angelo Cesta, 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.

Methyl ethyl ketone (CAS# 78-93-3)
n-Butyl acetate (CAS# 123-86-4)
Ethyl acetate (CAS# 141-78-6)
1,2,4-Trimethylbenzene (CAS# 95-63-6)
Ethylene glycol butyl ether acetate (CAS# 112-07-2)
Light aromatic solvent naphtha (CAS# 64742-95-6)

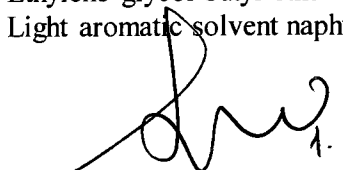


Angelo Cesta
Chief Operating Officer
ABC INOAC Exterior Systems Inc.

Certification by Toxic Substance Reduction Planner

As of December 16, 2013, I, Hua (Laurie) Li certify that I am familiar with the processes at ABC INOAC Exterior Systems Inc. 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.

Methyl ethyl ketone (CAS# 78-93-3)
n-Butyl acetate (CAS# 123-86-4)
Ethyl acetate (CAS# 141-78-6)
1,2,4-Trimethylbenzene (CAS# 95-63-6)
Ethylene glycol butyl ether acetate (CAS# 112-07-2)
Light aromatic solvent naphtha (CAS# 64742-95-6)



Hua (Laurie) Li
Environmental, Health and Safety Coordinator
ABC Group Inc.
Planner license number: TSRP0248