

## TRA Plan Summary – Hydrochloric Acid

### Basic Facility Information

<b>Name &amp; CAS # of Substance</b>	Hydrochloric Acid	7647-01-0
<b>Substances for which other plans have been prepared</b>	Nitrogen Oxides	11104-93-1
	10 µm Particulate Matter	NA-M09
	2.5 µm Particulate Matter	NA-M10
	Sulphur Dioxide	7446-09-5
	Polycyclic Aromatic Hydrocarbons (PAHs)	Various
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Safety-Kleen Canada Inc.	
<b>Facility Name</b>	Oil Recovery Division	
<b>Facility Address</b>	300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Spatial Coordination of Facility</b>	Easting: 547987.69 Northing: 4812609.46	
<b>Number of Employees</b>	121	
<b>NPRI ID</b>	4772	
<b>Ontario MOE ID Number</b>	Safety-Kleen Canada Inc.	
<b>Parent Company (PC) Information</b>		
<b>PC Name &amp; Address</b>	Safety-Kleen Canada Inc., 300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Percent Ownership for each PC</b>	<b>100%</b>	
<b>Business Number for PC</b>	NA	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
<b>2 Digit NAICS Code</b>	33 Manufacturing	
<b>4 Digit NAICS Code</b>	3241 – Petroleum and Coal Product Manufacturing	
<b>6 Digit NAICS Code</b>	324190 - Other Petroleum and Coal Product Manufacturing	
<b>Company Contact Information</b>		
<b>Facility Public Contact</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
	<a href="mailto:frank.wagner@safety-kleen.com">frank.wagner@safety-kleen.com</a>	
	Phone: (519) 648-2544 ext. 5269	
	Fax: (519) 648-2658	

<b>Facility Technical Contact:</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
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<b>Company Coordinator Contact</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
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	Phone: (519) 648-2544 ext. 5269	
<b>Person who Prepared the Plan: (if different from the Coordinator)</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates 651 Colby Dr. Waterloo, ON N2V 1C2
	Consultant	
	<a href="mailto:dlauder@croworld.com">dlauder@croworld.com</a>	
	Phone: (519) 884-0510 ext. 2299	
<b>Highest Ranking Employee</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
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	Phone: (519) 648-2544 ext. 5269	
<b>Planner Information:</b>		
<b>Planner Responsible for Making Recommendations</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2
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<b>Planner Responsible for Certification</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2
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	Phone: (519) 884-0510	

**Toxic Reduction Policy Statement of Intent**

Safety-Kleen Canada Inc. (Safety-Kleen) Plant 1 Facility creates Hydrochloric Acid in one process. The Facility does not intend to reduce the creation of this toxic substance at the Facility.

## **Reduction Objectives**

The objective of this plan is for Safety-Kleen to determine the technical and economic feasibility of each reduction option available to determine, which, if any, are available for implementation at this time.

## **Description of Facility**

Safety-Kleen is an oil re-refining plant. Used oil is brought to the facility where it undergoes re-refining, including dehydration, distillation, hydro-treatment and blending to create a number of different products. Hydrochloric acid is created due to the combustion of chlorinated compounds which are present as constituent compounds within the various fuel streams derived from the used oil.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 324190 - Other Petroleum and Coal Product Manufacturing.

In 2012, the Facility operated 24 hours per day, 7 days per week.

## **Toxic Substance Reduction Options to Be Implemented**

There were no options identified that can be implemented by Safety-Kleen to reduce the creation or releases of hydrochloric acid.

## **Plan Summary Statement**

This plan summary accurately reflects the content of the toxic substance reduction plan for Safety-Kleen.

## **Certification by Highest Ranking Employee**

Attached.

## **Certification by Licensed Planner**

Attached.

## TRA Plan Summary – Nitrogen Oxides

### Basic Facility Information

<b>Name &amp; CAS # of Substance</b>	Nitrogen Oxides	11104-93-1
<b>Substances for which other plans have been prepared</b>	Hydrochloric Acid	7647-01-0
	10 µm Particulate Matter	NA-M09
	2.5 µm Particulate Matter	NA-M10
	Sulphur Dioxide	7446-09-5
	Polycyclic Aromatic Hydrocarbons (PAHs)	Various
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Safety-Kleen Canada Inc.	
<b>Facility Name</b>	Oil Recovery Division	
<b>Facility Address</b>	300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Spatial Coordination of Facility</b>	Easting: 547987.69 Northing: 4812609.46	
<b>Number of Employees</b>	121	
<b>NPRI ID</b>	4772	
<b>Ontario MOE ID Number</b>	Safety-Kleen Canada Inc.	
<b>Parent Company (PC) Information</b>		
<b>PC Name &amp; Address</b>	Safety-Kleen Canada Inc., 300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Percent Ownership for each PC</b>	<b>100%</b>	
<b>Business Number for PC</b>	NA	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
<b>2 Digit NAICS Code</b>	33 Manufacturing	
<b>4 Digit NAICS Code</b>	3241 – Petroleum and Coal Product Manufacturing	
<b>6 Digit NAICS Code</b>	324190 - Other Petroleum and Coal Product Manufacturing	
<b>Company Contact Information</b>		
<b>Facility Public Contact</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
	<a href="mailto:frank.wagner@safety-kleen.com">frank.wagner@safety-kleen.com</a>	
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	Fax: (519) 648-2658	

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<b>Person who Prepared the Plan: (if different from the Coordinator)</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates 651 Colby Dr. Waterloo, ON N2V 1C2
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	Phone: (519) 884-0510	

**Toxic Reduction Policy Statement of Intent**

Safety-Kleen Canada Inc. (Safety-Kleen) Plant 1 Facility creates nitrogen oxides in one process. The Facility does not intend to reduce the creation of this toxic substance at the Facility.

## **Reduction Objectives**

The objective of this plan is for Safety-Kleen to determine the technical and economic feasibility of each reduction option available to determine, which, if any, are available for implementation at this time.

## **Description of Facility**

Safety-Kleen is an oil re-refining plant. Used oil is brought to the facility where it undergoes re-refining, including dehydration, distillation, hydro-treatment and blending to create a number of different products. Nitrogen oxides are created due to the combustion of various fuels for the purpose of creating heat and steam for use within the processes on-site.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 324190 - Other Petroleum and Coal Product Manufacturing.

In 2012, the Facility operated 24 hours per day, 7 days per week.

## **Toxic Substance Reduction Options to Be Implemented**

There were no options identified that can be implemented by Safety-Kleen to reduce the creation or releases of nitrogen oxides.

## **Plan Summary Statement**

This plan summary accurately reflects the content of the toxic substance reduction plan for Safety-Kleen.

## **Certification by Highest Ranking Employee**

Attached.

## **Certification by Licensed Planner**

Attached.

## TRA Plan Summary – 10µm Particulate Matter

### Basic Facility Information

<b>Name &amp; CAS # of Substance</b>	10 µm Particulate Matter	NA-M09
<b>Substances for which other plans have been prepared</b>	Hydrochloric Acid	7647-01-0
	Nitrogen Oxides	11104-93-1
	2.5 µm Particulate Matter	NA-M10
	Sulphur Dioxide	7446-09-5
	Polycyclic Aromatic Hydrocarbons (PAHs)	Various
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Safety-Kleen Canada Inc.	
<b>Facility Name</b>	Oil Recovery Division	
<b>Facility Address</b>	300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Spatial Coordination of Facility</b>	Easting: 547987.69 Northing: 4812609.46	
<b>Number of Employees</b>	121	
<b>NPRI ID</b>	4772	
<b>Ontario MOE ID Number</b>	Safety-Kleen Canada Inc.	
<b>Parent Company (PC) Information</b>		
<b>PC Name &amp; Address</b>	Safety-Kleen Canada Inc., 300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Percent Ownership for each PC</b>	<b>100%</b>	
<b>Business Number for PC</b>	NA	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
<b>2 Digit NAICS Code</b>	33 Manufacturing	
<b>4 Digit NAICS Code</b>	3241 – Petroleum and Coal Product Manufacturing	
<b>6 Digit NAICS Code</b>	324190 - Other Petroleum and Coal Product Manufacturing	
<b>Company Contact Information</b>		
<b>Facility Public Contact</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
	<a href="mailto:frank.wagner@safety-kleen.com">frank.wagner@safety-kleen.com</a>	
	Phone: (519) 648-2544 ext. 5269	
	Fax: (519) 648-2658	

<b>Facility Technical Contact:</b>	Mr. Frank Wagner	Same address as facility
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<b>Highest Ranking Employee</b>	Mr. Frank Wagner	Same address as facility
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	Phone: (519) 884-0510	

**Toxic Reduction Policy Statement of Intent**

Safety-Kleen Canada Inc. (Safety-Kleen) Plant 1 Facility creates 10 µm Particulate Matter (PM10) in two processes. The Facility does not intend to reduce the creation of this toxic substance at the Facility.



## **Reduction Objectives**

The objective of this plan is for Safety-Kleen to determine the technical and economic feasibility of each reduction option available to determine, which, if any, are available for implementation at this time.

## **Description of Facility**

Safety-Kleen is an oil re-refining plant. Used oil is brought to the facility where it undergoes re-refining, including dehydration, distillation, hydro-treatment and blending to create a number of different products. PM10 is created due to the combustion of various fuels for the purpose of creating heat and steam for use within the processes on-site and the release of particulate from the on-site cooling towers.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 324190 - Other Petroleum and Coal Product Manufacturing.

In 2012, the Facility operated 24 hours per day, 7 days per week.

## **Toxic Substance Reduction Options to Be Implemented**

There were no options identified that can be implemented by Safety-Kleen to reduce the creation or releases of PM10.

## **Plan Summary Statement**

This plan summary accurately reflects the content of the toxic substance reduction plan for Safety-Kleen.

## **Certification by Highest Ranking Employee**

Attached.

## **Certification by Licensed Planner**

Attached.

**TRA PLAN SUMMARY – 2.5 µm PARTICULATE MATTER****Basic Facility Information**

<b>Name &amp; CAS # of Substance</b>	2.5 µm Particulate Matter	NA-M10
<b>Substances for which other plans have been prepared</b>	Hydrochloric Acid	7647-01-0
	Nitrogen Oxides	11104-93-1
	10 µm Particulate Matter	NA-M09
	Sulphur Dioxide	7446-09-5
	Polycyclic Aromatic Hydrocarbons (PAHs)	Various
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Safety-Kleen Canada Inc.	
<b>Facility Name</b>	Oil Recovery Division	
<b>Facility Address</b>	300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Spatial Coordination of Facility</b>	Easting: 547987.69 Northing: 4812609.46	
<b>Number of Employees</b>	121	
<b>NPRI ID</b>	4772	
<b>Ontario MOE ID Number</b>	Safety-Kleen Canada Inc.	
<b>Parent Company (PC) Information</b>		
<b>PC Name &amp; Address</b>	Safety-Kleen Canada Inc., 300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Percent Ownership for each PC</b>	100%	
<b>Business Number for PC</b>	NA	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
<b>2 Digit NAICS Code</b>	33 Manufacturing	
<b>4 Digit NAICS Code</b>	3241 – Petroleum and Coal Product Manufacturing	
<b>6 Digit NAICS Code</b>	324190 - Other Petroleum and Coal Product Manufacturing	

<b>Company Contact Information</b>		
<b>Facility Public Contact</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
	<a href="mailto:frank.wagner@safety-kleen.com">frank.wagner@safety-kleen.com</a>	
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	Fax: (519) 648-2658	
<b>Facility Technical Contact:</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
	<a href="mailto:frank.wagner@safety-kleen.com">frank.wagner@safety-kleen.com</a>	
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<b>Company Coordinator Contact</b>	Mr. Frank Wagner	Same address as facility
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<b>Person who Prepared the Plan: (if different from the Coordinator)</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates 651 Colby Dr. Waterloo, ON N2V 1C2
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<b>Highest Ranking Employee</b>	Mr. Frank Wagner	Same address as facility
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	Phone: (519) 648-2544 ext. 5269	
	Fax: (519) 648-2658	

Planner Information:		
<b>Planner Responsible for Making Recommendations</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2
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	Phone: (519) 884-0510	
<b>Planner Responsible for Certification</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2
	Planner License No: TSRP0014	
	<a href="mailto:dlauder@croworld.com">dlauder@croworld.com</a>	
	Phone: (519) 884-0510	

**Toxic Reduction Policy Statement of Intent**

Safety-Kleen Canada Inc. (Safety-Kleen) Plant 1 Facility creates 2.5 µm Particulate Matter (PM2.5) in one process. The Facility does not intend to reduce the creation of this toxic substance at the Facility.

**Reduction Objectives**

The objective of this plan is for Safety-Kleen to determine the technical and economic feasibility of each reduction option available to determine, which, if any, are available for implementation at this time.

**Description of Facility**

Safety-Kleen is an oil re-refining plant. Used oil is brought to the facility where it undergoes re-refining, including dehydration, distillation, hydro-treatment and blending to create a number of different products. PM2.5 is created due to the combustion of various fuels for the purpose of creating heat and steam for use within the processes on-site.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 324190 - Other Petroleum and Coal Product Manufacturing.

In 2012, the Facility operated 24 hours per day, 7 days per week.

**Toxic Substance Reduction Options to be Implemented**

There were no options identified that can be implemented by Safety-Kleen to reduce the creation or releases of PM2.5.

**Plan Summary Statement**

This plan summary accurately reflects the content of the toxic substance reduction plan for Safety-Kleen.

**Certification by Highest Ranking Employee**

Attached.

**Certification by Licensed Planner**

Attached.

**TRA PLAN SUMMARY – SULPHUR DIOXIDE****Basic Facility Information**

<b>Name &amp; CAS # of Substance</b>	Sulphur Dioxide	7446-09-5
<b>Substances for which other plans have been prepared</b>	Hydrochloric Acid	7647-01-0
	Nitrogen Oxides	11104-93-1
	10 µm Particulate Matter	NA-M09
	2.5 µm Particulate Matter	NA-M10
	Polycyclic Aromatic Hydrocarbons (PAHs)	Various
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Safety-Kleen Canada Inc.	
<b>Facility Name</b>	Oil Recovery Division	
<b>Facility Address</b>	300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Spatial Coordination of Facility</b>	Easting: 547987.69 Northing: 4812609.46	
<b>Number of Employees</b>	121	
<b>NPRI ID</b>	4772	
<b>Ontario MOE ID Number</b>	Safety-Kleen Canada Inc.	
<b>Parent Company (PC) Information</b>		
<b>PC Name &amp; Address</b>	Safety-Kleen Canada Inc., 300 Woolwich Street South Breslau, Ontario NOB 1M0	
<b>Percent Ownership for each PC</b>	<b>100%</b>	
<b>Business Number for PC</b>	NA	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
<b>2 Digit NAICS Code</b>	33 Manufacturing	
<b>4 Digit NAICS Code</b>	3241 – Petroleum and Coal Product Manufacturing	
<b>6 Digit NAICS Code</b>	324190 - Other Petroleum and Coal Product Manufacturing	

<b>Company Contact Information</b>		
<b>Facility Public Contact</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
	<a href="mailto:frank.wagner@safety-kleen.com">frank.wagner@safety-kleen.com</a>	
	Phone: (519) 648-2544 ext. 5269	
	Fax: (519) 648-2658	
<b>Facility Technical Contact:</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
	<a href="mailto:frank.wagner@safety-kleen.com">frank.wagner@safety-kleen.com</a>	
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<b>Company Coordinator Contact</b>	Mr. Frank Wagner	Same address as facility
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<b>Person who Prepared the Plan: (if different from the Coordinator)</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates 651 Colby Dr. Waterloo, ON N2V 1C2
	Consultant	
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<b>Highest Ranking Employee</b>	Mr. Frank Wagner	Same address as facility
	Director, Environmental Health and Safety	
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	Fax: (519) 648-2658	

<b>Planner Information:</b>		
<b>Planner Responsible for Making Recommendations</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2
	Planner License No: TSRP0014	
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	Phone: (519) 884-0510	
<b>Planner Responsible for Certification</b>	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2
	Planner License No: TSRP0014	
	<a href="mailto:dlauder@croworld.com">dlauder@croworld.com</a>	
	Phone: (519) 884-0510	

**Toxic Reduction Policy Statement of Intent**

Safety-Kleen Canada Inc. (Safety-Kleen) Plant 1 Facility uses and creates Sulphur Dioxide (SO<sub>2</sub>) in two processes. The Facility does not intend to reduce the use or creation of this toxic substance at the Facility.

**Reduction Objectives**

The objective of this plan is for Safety-Kleen to determine the technical and economic feasibility of each reduction option available to determine, which, if any, are available for implementation at this time.

**Description of Facility**

Safety-Kleen is an oil re-refining plant. Used oil is brought to the facility where it undergoes re-refining, including dehydration, distillation, hydro-treatment and blending to create a number of different products. SO<sub>2</sub> is created due to the combustion of various fuels for the purpose of creating heat and steam for use within the processes on-site, and is used within an additive product used.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 324190 - Other Petroleum and Coal Product Manufacturing.

In 2012, the Facility operated 24 hours per day, 7 days per week.

**Toxic Substance Reduction Options to be Implemented**

There were no options identified that can be implemented by Safety-Kleen to reduce the creation or releases of SO<sub>2</sub>.

**Plan Summary Statement**

This plan summary accurately reflects the content of the toxic substance reduction plan for Safety-Kleen.



**Certification by Highest Ranking Employee**

Attached.

**Certification by Licensed Planner**

Attached.

## Section 2.0 Plan Certification

### CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 20, 2013, I, Frank Wagner, 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 that Act.

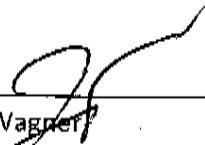
Hydrochloric Acid

Nitrogen Oxides

10 µm Particulate Matter

2.5 µm Particulate Matter

Sulphur Dioxide

  
 Frank Wagner  
 Director – Environmental Health and Safety  
 Safety-Kleen Canada Inc.

12/30/2013  
 Date

### CERTIFICATION BY LICENSED PLANNER

As of December 20, 2013, I, Dana Lauder, certify that I am familiar with the processes at Safety-Kleen that use or create the toxic substance 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 plan dated December 20, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Hydrochloric Acid

Nitrogen Oxides

10 µm Particulate Matter

2.5 µm Particulate Matter

Sulphur Dioxide

  
 Dana Lauder  
 Licensed Toxic Reduction Planner, License # TSRP0014  
 Conestoga-Rovers & Associates Ltd.

December 20, 2013

Date