



**ENVIRONMENTAL REPORTING
SYSTEMS LIMITED**

**Baytech Plastics Inc.
Heritage Plant
#16403 Highway 12, Midland, Ontario L4R 4L6**

**Toxic Substance Reduction Plan Summary 2013
Public Report
covering
Toxic Substance Reduction Plans for
Methyl Ethyl Ketone & Butyl Acetate
(dated Dec. 29th, 2014, confirmed Mar. 31st, 2015)
and
Toxic Substance Reduction Plans for
Ethyl Alcohol & Acetone
(dated July 13th, 2015, confirmed July 21st, 2015)**

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HERITAGE PLANT
#16403 Highway 12, Midland, Ontario L4R 4L6**

**Toxic Substance Reduction Plan Summary
Methyl Ethyl Ketone
Butyl Acetate
Ethyl Alcohol
Acetone**

Toxics Reduction Act & Ontario Regulation 455/09

For: Michael Dutton
Director, Heritage Operations
Baytech Plastics Inc.

July 21st, 2015

Toxic Substance Reduction Plan Summary

Methyl Ethyl Ketone, Butyl Acetate, Ethyl Alcohol, Acetone Toxics Reduction Act and Ontario Regulation 455/09

Description of Facility

Baytech Plastics Inc. (Baytech) produces various plastic products for commercial and home use. The main facility activities include manufacturing, assembly, shipping, receiving, and warehousing. The facility operates 24 hours per day, seven days per week and no incidents out of the normal course of events occurred at the facility during 2013. It therefore uses 2013 calendar year data for the Phase 2 Substances Methyl Ethyl Ketone (MEK), Butyl Acetate, Ethyl Alcohol and Acetone. MEK, Butyl Acetate and Ethyl Alcohol are present in the manufacturing process, are TRA Phase 2 substances and National Pollutant Release Inventory (NPRI) Part 5 Speciated Volatile Organic Compounds (VOC) released in excess of 1 tonne, through its significant contribution to the total emission of NPRI Part 4 group of substances; VOC's. Acetone is also present in the manufacturing process, is a TRA Phase 2 substance and an Ontario Ministry of Environment Airborne Contaminant Discharge Table 2B substance in excess of 3,000 kilograms but is not considered a VOC. A Toxic Substance Reduction Plan (dated Dec. 29th, 2014 and confirmed Mar. 31st, 2015) for MEK and Acetone was made using 2012 data as these two substances qualified as NPRI and TRA reportable substances that year, while Butyl Acetate and Ethyl Alcohol were both under reporting thresholds until 2013. This Plan Summary and Public Report covers all four substances for 2013.

Baytech is committed to environmental sustainability. More information is available at <http://www.baytechplastics.com/environmental> and <http://www.baytechplastics.com/green-initiatives>.

Facility Name: Baytech Plastics Inc.

Location: #16403 Highway 12, Midland, Ontario L4R 4L6

Phone Number: (705) 526-0591

Fax Number: (705) 526-1560

NPRI Identification Number: 2966

MOE I.D. Number: 5666

2-Digit NAICS Code: 32 4-Digit NAICS Code: 3261

6-Digit NAICS Code: 326198 – All Other Plastic Product Manufacturing

Number of Full-time Employees: ~ 106

UTM Spatial Coordinates: (NAD83-Zone17) 590778 mE: 4954391 mN (front entrance)

Substance 1: Methyl Ethyl Ketone (MEK) CAS Number: 78-93-3

Substance 2: Acetone CAS Number: 67-64-1

Substance 3: Butyl Acetate CAS Number 123-86-4

Substance 4: Ethyl Alcohol CAS Number 64-17-5

Public Contact

Name: Dave Taylor, Purchasing Manager

Address: #16403 Highway 12, Midland, Ontario L4R 4L6

Phone Number: (705) 526-0591 Ext. 321

Fax Number: (705) 526-1560

E-mail: davet@baytechplastics.com

Methyl Ethyl Ketone, Butyl Acetate and Ethyl Alcohol are released to air as VOC's from their use as a thinner (MEK) and a component in coatings during mixing and painting (others). Acetone is released to air as a VOC from it being used as a cleaner for paint equipment and in a very minor amount from one coating during mixing, painting and drying.

Methyl Ethyl Ketone (MEK) (CAS# 78-93-3)

[MEK] Release to Air from facility process (mixing, painting and drying)

- has straight forward quantifications and direct and indirect cost estimates
- qualified as NPRI Part 5 as threshold surpassed (>1,000 kg as individual VOC)
- Methanol qualified as a Speciated VOC in 2012

Butyl Acetate (CAS# - 123-86-4)

Butyl Acetate Release to Air from facility process (mixing, painting and drying)

- has straight forward quantifications and direct and indirect cost estimates
- qualified as NPRI Part 5 as threshold surpassed (>1,000 kg as individual VOC)

Ethyl Alcohol (CAS# - 64-17-5)

Ethyl Alcohol Release to Air from facility process (mixing, painting and drying)

- has straight forward quantifications and direct and indirect cost estimates
- qualified as NPRI Part 5 as threshold surpassed (>1,000 kg as individual VOC)

Acetone (CAS# - 67-64-1)

[Acetone] Release to Air from facility process (mixing, painting and drying)

- has straight forward quantifications and direct and indirect cost estimates
- qualified as MOE Reg.127 as threshold surpassed (>3,000 kg)

Statement of Intent

After careful and due consideration of its operations and with ongoing commitment to its environmental sustainability policy, Baytech does not intend to reduce the use and release of the toxic substances at this time.

Objective of the Plan

As options available for reduction are dependent on customer requirements which do not allow for the use of alternatives in coatings, thinner or cleaner, no objective for substance reduction will be made under these plans for MEK, Butyl Acetate, Ethyl Alcohol or Acetone.

Target & Timeline

Baytech is able to reduce the use of the Acetone as a cleaner, but this would not reduce Acetone to a level below the reporting threshold and would not reduce the overall use of NPRI Part 5 speciated VOC's. Baytech is not able to reduce the use of Methyl Ethyl Ketone (MEK) as a thinner, nor able to reduce the use of Acetone, MEK, Butyl Acetate and/or Ethyl Alcohol as components in coatings and therefore has no targets or timelines for the Plans.

Substance Use

Baytech produces plastic products, most of which are coated with primers, additives and paints.

TRA prescribed toxic substances MEK, Butyl Acetate, Ethyl Alcohol and Acetone are received at the facility in liquid form in metal containers (5 litre pails and 205 litre drums).

Primers and paints are mixed with a thinner (MEK) to prepare coatings for spray painting plastic parts (painting process).

Acetone is used as a cleaner for painting equipment. All substances are also present as components in coatings. MEK, Butyl Acetate, Ethyl Alcohol and Acetone, being volatile substances, vapourize during mixing, painting and drying of parts, escaping as Air emissions.

There are no other creations (C), Destruction (D), Transformation (T), releases (L, W), disposal (DIS), offsite transfers (TR) of TRA substances or any substance contained in product (P).

TRA Summary Table

Baytech Plastics Inc. - Heritage Plant - TRA Substance Accounting Public Report 2013

Substance	CAS #	Year	Used	change % & qty.	Created	change % & qty.	Released	change % & qty.	Disposed	Recycled	Contained in Product
Total VOC's	N/A	2013	10-100	0%	0-1	0%	10-100	0%	-	-	-
		2012	10-100	0	0-1	0	10-100	0	-	-	-
Methyl Ethyl Ketone	78-93-3	2013	1-10	0%	-	-	1-10	0%	-	-	-
		2012	1-10	0	-	-	1-10	0	-	-	-
Butyl Acetate	123-86-4	2013	1-10	0%	-	-	1-10	0%	-	-	-
		2012	Below Threshold								
Ethyl Alcohol	64-17-5	2013	1-10	0%	-	-	1-10	0%	-	-	-
		2012	Below Threshold								
Acetone	67-64-1	2013	1-10	0%	-	-	1-10	0%	-	-	-
		2012	1-10	0	-	-	1-10	0	-	-	-

Units - Tonnes.

The Plan objectives, targets and timelines have not been affected in the reporting year as there were no reduction options for implementation. There was no change in the method or combination of methods used to track and quantify the toxic substances during the previous calendar year. There were no incidents out of the normal course of events, nor were there any significant process changes at the facility during the previous calendar year.

These Toxic Substance Reduction Plan Summaries accurately reflect the Plans they summarize.

Plan Confirmations for Toxic Substances

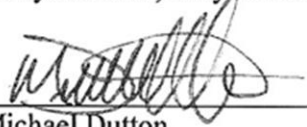
Due to the lateness of the submission of the Plan (for the two new substances in 2013; Butyl Acetate and Ethyl Alcohol. MEK and Acetone were covered in a Plan for 2012) with regards to the regulatory deadlines, certifications may not be stated, rather confirmations are required and provided here;

TOXIC SUBSTANCE REDUCTION PLAN for BUTYL ACETATE & ETHYL ALCOHOL

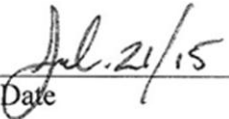
BAYTECH PLASTICS INC. – MIDLAND, ONTARIO

As of Jul.14/15, I, Michael Dutton, confirm that I have read the toxic substance reduction plan for the toxic substances referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies, with the exception of the regulatory deadline, with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

[Butyl Acetate, Ethyl Alcohol]



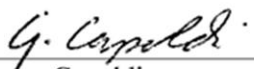
Michael Dutton
Director – Heritage Operations, Baytech Plastics Inc.
(Highest Ranking Employee)



Date

As of July 21st, 2015, I, Grahaem Capaldi confirm that I am familiar with the processes at Baytech Plastics 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 plan dated July 13th, 2015 and that the plan complies, with the exception of the regulatory deadline, with that Act and Ontario Regulation 455/09 (General) made under that Act.

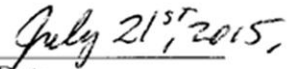
[Butyl Acetate, Ethyl Alcohol]



Grahaem Capaldi
President - Environmental Reporting Systems Limited (Toxic Substance Reduction Planner)



TSRP#



Date