



**ENVIRONMENTAL REPORTING
SYSTEMS LIMITED**

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

Toxic Substance Reduction Plan Summary

**Methyl Ethyl Ketone
Acetone**

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Toxic Substance Reduction Plan Summary
Methyl Ethyl Ketone
Acetone

Toxics Reduction Act & Ontario Regulation 455/09

For: Dave Taylor
Purchasing Manager
Baytech Plastics Inc.

December 29th, 2014

Toxic Substance Reduction Plan Summary

Methyl Ethyl Ketone, 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 2012. This report is specific to Phase 2 substances. It therefore uses 2012 calendar year data for the Phase 2 Substances Methyl Ethyl Ketone (MEK) and Acetone. MEK is present in the manufacturing process, is a TRA Phase 2 substance and an National Pollutant Release Inventory (NPRI) Part 5 Speciated Volatile Organic Compound (VOC) 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.

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

NPRI Identification Number: 2966 MOE I.D. Number: 5666

Two Digit NAICS Code: 32 Four Digit NAICS Code: 3261

Six Digit NAICS Code: 326198 – All Other Plastic Product Manufacturing

Number of Full-time Employees: ~ 99

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

Facility Name: Baytech Plastics Inc. – Heritage Plant

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

Phone Number: (705) 526-0591 Fax Number: (705) 526-1560

Substance 1: Methyl Ethyl Ketone (MEK) CAS Number: 78-93-3 (TRA Phase 2)

Substance 2: Acetone CAS Number: 67-64-1 (TRA Phase 2)

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 is released to air as a VOC from it being used as a thinner and a component in coatings during mixing and painting. 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 is the only qualified Speciated VOC used at Baytech

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 this plan for MEK 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 and MEK as components in coatings and therefore has no targets or timelines for the Plan.

Substance Use

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

TRA prescribed toxic substances MEK 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. Both substances are also present as components in coatings. MEK 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 2012

Substance	CAS#	Used tonnes	Created tonnes	Transformed tonnes	Released tonnes	Recycled tonnes	Disposed tonnes
Total VOC's	n/a	10-100	-	-	10-100	-	-
Methyl Ethyl Ketone	78-93-3	1-10	-	-	1-10	-	-
Acetone	67-64-1	1-10	-	-	1-10	-	-

Plan Confirmations for Toxic Substances

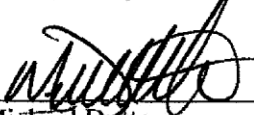
Due to the lateness of the submission of these Plans with regards to the regulatory deadlines, certifications may not be stated, rather confirmations are required and provided here;

TOXIC SUBSTANCE REDUCTION PLAN

BAYTECH PLASTICS INC. - MIDLAND, ONTARIO

As of <DATE>, 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.

[Methyl Ethyl Ketone, Acetone]




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

Mar. 31 / 15

Date

As of <DATE>, 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 December 29th, 2014 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.

[Methyl Ethyl Ketone, Acetone]



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

0063

TSRP#

Mar. 31, 2015.

Date