

## TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the contents of the plan for Phosphorus.

### Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	Phosphorus (7723-14-0) & PM <sub>10</sub> (Summary Provided Under a Separate Cover)
NPRI and O. Reg. 127/01 Identification Numbers	11777
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Premier Tech Home & Garden 3871 Concession 21 Road St. Isidore, Ontario K0C 2B0 Canada
The number of full time employee equivalents at the facility	55
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	“33” Manufacturing “3399” Other Miscellaneous Manufacturing “339990” All Other Miscellaneous Manufacturing
Public contact, technical contact and person who is responsible for coordinating plan preparation	Shaun Purcell, Quality Manager Phone Number: 1-905-814-7040
The person who prepared the plan	Camille Taylor, Senior Air Quality Specialist, Golder Associates Ltd. TSRP 0283
Highest Ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for making certification	Stephane Gosselin, Plant Manager
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	507329 m, 5021543 m, Zone 18
Parent Company Information	Premier Tech Home & Garden 1900 Minnesota Cr., Suite 125 Mississauga, Ontario L5N 3C9

## List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

- Phosphorus (7723-14-0); and
- PM<sub>10</sub> (Summary Provided Under a Separate Cover).

### Statement of Intent

As required by s.4(1) of the TRA, 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.

A statement of the Facility's intent to reduce its "use" of the Toxic Substance has not been included as a part of this Plan.

The Toxic Substance is never created within the Facility's process and therefore no statement with respect to intent to reduce creation of the Toxic Substance is required.

The Toxic Substance has triggered reporting under the TRA and O.Reg.455/09 due to its presence in the raw materials used to manufacture the final product. The Toxic Substance passes through the Facility process without undergoing any chemical change and, due to their presence in the raw materials, the Facility activities which the TRA has defined as a "use" of this Toxic Substance can only be reduced by reducing the Facility's production.

Additionally, the Facility has overarching Corporate Environmental and Health and Safety Policy Statements. Several Standard Operating Procedures (SOP) ranging from housekeeping, (including floor sweeping to training and forklift operations have been developed in accordance with the policy statements. When required, new SOPs are developed and current SOPs are revised on an as needed basis to reflect best practices and minimize releases of the Toxic Substance. As per the Corporate Health and Safety Policy, training is provided to all team members for their specific job requirements. Training is also provided to maintain all equipment in good working order and to minimize potential material losses.

### Objectives of the Toxic Substance Reduction Plan

The objectives of this Toxics Reduction Plan (TRP) are to:

- provide support for the Facility's position with respect to the Statement of Intent by providing an explanation of how the TRA's definition of the word "use", as applied to the Toxic Substance, renders it impossible to reduce the "use" of the Toxic Substance without reducing Facility production;
- provide support for the Facility's position with respect to the Statement of Intent of the Plans; and
- document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

### Description of Why the Toxic Substance Is Used or Created

The activity that has been classified as a "use" of the toxic substance for the purpose of the required TRA Quantification, Accounting and Reporting exercise for the Toxic Substance is the use of the Toxic Substance (Phosphorus) as part of the raw materials used to create the product.

Operations at the Facility involve receipt of finished fertilizers, peat moss, compost, and humus. The fertilizers are received in bags or totes and stored in the warehouse area until use. The peat moss, compost, and humus are stockpiled outside and transferred inside using a bucket loader. The main source of phosphorus is the finished fertilizers which contain phosphorus as an ingredient. The finished fertilizers are mixed with other raw materials in various concentrations to generate an array of customer specific soil products. These operations take place in the two processing areas: the inline blending system (mentioned above) and the small packaging lines, which are used to package small packs of fertilizer and grass seed. The small packaging lines are serviced by a baghouse to control emissions.

A graphical representation of the Facility's "use" and subsequent release of the Toxic Substance is provided as part of the Toxic Substance Quantification, Accounting and Reporting exercise.

## **Toxic Substance Reduction Options Selected for Implementation**

After careful consideration of each of the seven categories for toxic substance reduction options, and subsequent technical and economic feasibility analyses, no options for the reduction of toxic substances could be identified.

The Facility employs a system of continual improvement which focuses on optimizing material utilization, reducing waste, and subsequently increasing efficiency. Facility operations have been analyzed and evaluated extensively and repeatedly, and numerous efforts to reduce waste and material usage have been implemented. As a result of PTHG's drive to reduce waste and increase efficiency, at the time of this Plan's creation, no options for the reduction of use of the toxic substance could be identified.

## **Rationale for Not Implementing Toxic Substance Reduction Options**

As required by s.17(2) of O. Reg. 455/09), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories. This result is due mainly to the proactive approach employed by Facility personnel to ensure material use efficiency, scrap reduction, and continuous process optimization. These proactive approaches, which have resulted in potential reductions of toxic substance use, have been realized prior to this exercise. Risk of losing material through the Facility's processes has already been minimized as loss of material results in increased costs associated with the purchasing of new material. Improved operations and equipment are continually being researched and assessed for applicability and feasibility, as improved operations (including reducing material losses) aid in increasing the efficiency of the process, minimize loss of materials containing phosphorus. This is strongly encouraged by the facility's practices and Corporate Environmental Policy Statement,

Therefore, the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified. Facility personnel will continue to evaluate and assess future potential reduction options as they become available through the advancement of materials technology, manufacturing process and management.

## **Planner License Number**

As required by s.18(2) of O. Reg. 455/09, the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan is as follows:

Camille Taylor

Senior Air Quality Specialist

Golder Associates Ltd.

Toxic Substance Reduction Planner License Number TSRP 0283

## **Copies of the Certification**

Certification statements are provided in the following page.

**Premier Tech Home and Gardens - St. Isidore - Public Summary Report**

**Facility Information:** Premier Tech Home & Garden  
3871 Concession 21 Road  
St. Isidore, Ontario  
K0C 2B0  
Canada

NPRI ID: 11777  
Business #: 850963992  
CDN SIC code: 3399  
US SIC code: 3399  
NAICS code: 339990 - All Other Miscellaneous Manufacturing

**Parent Company:** Premier Tech Home & Garden  
150 Savannah Oaks Drive  
Brantford, Ontario  
N3V 1E7  
Canada

Substance Accounting Summary Table for 2013

Toxic Substance	CAS No.	Use		Creation		Contained in Product	
		Tonnes in 2013	% Change from 2012	Tonnes in 2013	% Change from 2012	Tonnes in 2013	% Change from 2012
Total Phosphorus	N/A - M1	>10 to 100	-20%	0 to 1	—	>10 to 100	-20%
PM10	N/A - M09	0 to 1	—	0 to 1	-19%	0 to 1	—

Substance Accounting Summary Table for 2013 (Continued)

Toxic Substance	CAS No.	Released to Air		Released to Land		Disposed of on-site to Land	
		Tonnes in 2013	% Change from 2012	Tonnes in 2013	% Change from 2012	Tonnes in 2013	% Change from 2012
Total Phosphorus	N/A - M1	0 to 1	—	—	—	—	—
PM10	N/A - M09	0 to 1	-19%	—	—	—	—

Substance Accounting Summary Table for 2013 (Continued)

Toxic Substance	CAS No.	Transferred off-site for Disposal		Transferred off-site for Treatment Prior to Final Disposal		Transferred off-site for Recycling	
		Tonnes in 2013	% Change from 2012	Tonnes in 2013	% Change from 2012	Tonnes in 2013	% Change from 2012
Total Phosphorus	N/A - M1	—	—	—	—	—	—
PM10	N/A - M09	—	—	—	—	—	—

**TRA Planner:** Camille Taylor, Senior Air Quality Specialist, Golder Associates Ltd., TSRP 0283

**Certification:** As of June 1, 2014, I certify that I have read the baseline report on the toxic substance reduction plans for the substances referenced in the above table and am familiar with its contents and to my knowledge the information contained in the report is factually accurate and the report complies with the *Toxics Reduction Act*, 2009 and Ontario Regulation 455/09 (General) made under the Act.

**Stephane Gosselin, Plant Manager**

**Signature:**

### Toxic Substance Reduction Plans Certification by Highest Ranking Employee

As required by s.4(2) of the *Toxics Reduction Act* (TRA), Toxic Substance Reduction Plans must contain a certification, signed by the highest ranking employee at the Facility who has management responsibilities relating to the Facility.

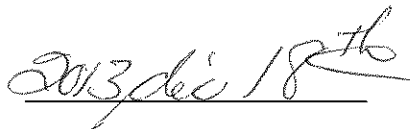
The following Certification Statement is being made under s.19(2) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) and satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plans that are assembled within this single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

*As of December 18, 2013, I, Stephane Gosselin, 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.*

- Phosphorus (dated, December 18, 2013)
- PM<sub>10</sub> (dated, December 18, 2013)



Stephane Gosselin  
Plant Manager  
3871 Concession 21 Road  
St. Isidore, Ontario  
K0C 2B0



Date

December 18, 2013

Project No. 13-1126-0069

Shaun Purcell  
Premier Tech Home & Garden 150 Savannah Oaks Drive  
Brantford, Ontario  
N3V 1E7

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CERTIFICATION STATEMENT FOR PHASE II  
TOXIC SUBSTANCE REDUCTION PLANS FOR PREMIER TECH HOME & GARDEN, ST. ISIDORE, ON**

Dear Mr. Purcell:

Golder Associates Ltd. (Golder) was retained by Premier Tech Home & Garden for the St. Isidore facility located at 3871 Concession 21 Road, St. Isidore, Ontario (the Facility) to provide various services pertaining to Phase II Toxic Substance Reduction Plan preparation under the *Toxic Reduction Act* (TRA), including Toxic Substance Reduction Planner (Planner) certification of Phase II Toxic Substance Reduction Plans (the Plans).

The following Planner Certification Statement which is made under s.19.1(4) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) satisfies the Planner Certification requirements for the Plans that are assembled as a single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

*As of December 18, 2013, I, Camille Taylor, certify that I am familiar with the processes at Premier Tech Home & Garden's St. Isidore facility located at 3871 Concession 21 Road, St. Isidore, Ontario that uses the toxic substances referred to below. 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.*

- Phosphorus (dated, December 18, 2013)
- PM10 (dated, December 18, 2013)



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Camille Taylor, P.Eng., Eng.  
Toxic Substance Reduction Planner  
License No. 0283

December 18, 2013

Date

AVW/CST/FSC/kf

