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 PM_{10}.

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	PM_{10} & Phosphorus (7723-14-0) (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 Crt., 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:

- PM_{10}; and,
- Phosphorus (7723-14-0) (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 "creation" of the Toxic Substance has not been included as a part of this Plan.

The Toxic Substance cannot be "used" in the Facility process and therefore no statement with respect to intent to reduce use of the Toxic Substance is required.

The Toxic Substance has triggered reporting under the TRA and O.Reg.455/09 due to two types of activities at the Facility which are defined as "creations" of the Toxic Substance under the TRA framework. The first activity that has been classified as a "creation" of the toxic substance for the purpose of the required TRA Quantification, Accounting and Reporting exercise for the Toxic Substances is the generation of suspended particulate matter in various size fractions as dust from unpaved roads at the Facility due to movement of vehicles for purposes of material transfers and other operations. The other activities that have been classified as a "creation" of the toxic substance for the purpose of the required TRA Quantification, Accounting and Reporting exercise for the Toxic Substances is the appearance of the Toxic Substances in the form of particulate matter as a result of the Facility's operations includes material handling and blending, and emissions from which are collected by a dust collector.

The MOE has stated that the TRA is not intended to focus on "end of pipe" emissions as they don't necessarily have any bearing on the amount of a substance that is "used" or "created," however in this case, "end of pipe" emission of the Toxic Substance are the determining factor of the Facility's TRA reporting status with respect to the Toxic Substance.

Despite the Facility's reporting status with respect to the Toxic Substance, the "creation" and subsequent release of the Toxic Substance has already been minimized to the greatest extent that can reasonably be expected. This opinion is supported by the following information.

It is well documented that the generation of suspended particulate matter such as the Toxic Substance (PM_{10}) is an inherent result of transportation activities carried out on unpaved roads in many manufacturing industries as well as material handling operations, and that these activities leading to the release of suspended particulate matter are essential to these industries. In recognition of this, the MOE has imposed various regulatory requirements related to the release of suspended particulate matter, which include:

- Ontario Regulation 419/05, under which a Facility must demonstrate compliance with substance-specific ground-level concentration limits of emitted substances, including suspended particulate matter in all forms that are reportable under the NPRI and TRA reporting programs; and,

- The requirement for any Facility that may discharge any contaminant to the atmosphere to apply for and obtain an Environmental Compliance Approval (ECA) for air which approves the facility's emissions and provides performance limits, documentation requirements and reporting requirements which a Facility must meet in order to maintain compliance with the ECA on an ongoing basis.

PTHG currently meets and/or exceeds all of the above regulatory requirements which are designed to control the release of the Toxic Substance and minimize potential off-site impacts resulting from the release of the Toxic Substance.

As a result of satisfying the above noted regulatory requirements in addition to voluntary actions with respect to suspended particulate matter releases, PTHG actively implements a variety of controls to minimize suspended particulate matter releases from different parts of its process components. These controls include, but are not limited to, the following:

- dust suppressant application to on-site unpaved roadways;
- compactions of the stockpiles to reduce wind erosion;
- minimizing outdoor material handling activities;
- optimization of material stockpile size, location and drop heights; and
- operation of a baghouse in the small packaging lines area of the facility.

Objectives of the Toxic Substance Reduction Plan

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

- provide the reader with information on measures currently in place at the Facility which control the "creation" and subsequent release of the Toxic Substance;
- 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 "creation" of the toxic substance for the purpose of the required TRA Quantification, Accounting and Reporting exercise for the Toxic Substance is the generation of the Toxic Substance (PM_{10}) as a result of transportation activities on unpaved roads and material handling operations at the Facility. The Toxic Substance cannot be "used" in the Facility process.

Operations at the Facility involve receipt of finished fertilizers, peat moss, compost, and humus. Upon receipt, the fertilizers are stored inside in bags or totes. The peat moss, compost, and humus are stockpiled outside and then moved inside using a bucket loader. The transportation activities are the main source of fugitive road dust emissions (i.e. creation of particulate) due to travel on unpaved roads (total area of approximately 25 acres).

Following transfer indoors, these materials are then moved using another bucket loader to the bins that feed into the soil hoppers which feed into the inline blending system. The material handling process results in the fugitive emissions of particulate matter.

The facility consists of two main 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 (i.e. dust collector) to control emissions.

A graphical representation of the Facility's "creation" 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 thus creation of particulate) 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 toxic substance could be identified.

Rationale for Not Implementing Toxic Substance Reduction Options

As required by s.17(1) 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 continuous process optimization which has resulted in potential reductions of toxic substance creation have been realized prior to this exercise. Improved operations and equipment are continually being researched and assessed for applicability and feasibility, as improved operations (resulting in reduced PM_{10} creation) aid in increasing efficiency of the process, minimize loss of materials and thus the formation of particulate. This is strongly encouraged by the Facility's practices and Corporate Environmental Policy Statement.

Prior to this exercise, the Facility has already minimized "creation" and subsequent release of the Toxic Substance to the greatest extent that can reasonably be expected.

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.

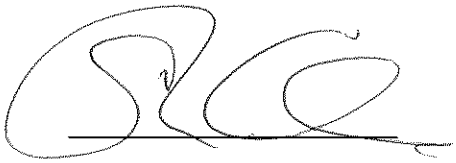
Stephane Gosselin, Plant Manager **Signature:**

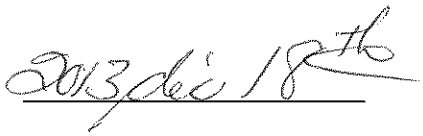
Toxic Substance Reduction Plans Certification by Highest Ranking Employee

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_{10}* *(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 & Garden150 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)*

_____ December 18, 2013

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

AVW/CST/FSC/kf

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Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America