

Plan Summary – Formaldehyde

Facility Identification & Site Address:

Facility Name:	The Dodge Company (Canada)
Facility Address:	1265 Fewster Drive, Mississauga, Ontario
NPRI Identification Number:	0000011729
Ontario MOE Identification Number:	n.av.
Spatial Coordinates of Facility:	Latitude: 43.63020; Longitude: -79.61890
Two (2) Digit NACIS Code:	32
Four (4) Digit NACIS Code:	3259
Six (6) Digit NACIS Code:	325999

Parent Company (PC):

Name:	The Dodge Company
Address:	9 Progress Road, Billerica, Massachusetts 01821
Percentage of facility owned by company:	100%
Business number:	Not applicable. The parent company is not a Canadian Company.

Facility Public Contact:

Name:	Randy Rogalsky
Position:	President
Address:	1265 Fewster Drive, Mississauga, Ontario
Phone Number:	(905)-625-0311, Ext. 223
Fax Number:	(905)-624-1109
E-mail:	rrogalsky@dodgecan.com

Facility Technical Contact:

Name:	Jasdeep Dhaliwal
Position:	Chemical Technologist
Address:	1265 Fewster Drive, Mississauga, Ontario
Phone Number:	(905)-625-0311, Ext. 224
Fax Number:	(905)-624-1109
E-mail:	jdhaliwal@dodgecan.com

Highest Ranking Employee:

Name:	Randy Rogalsky
Position:	President
Address:	1265 Fewster Drive, Mississauga, Ontario
Phone Number:	(905)-625-0311, Ext. 223
Fax Number:	(905)-624-1109
E-mail:	rrogalsky@dodgecan.com

Person Coordinating the Preparation of the Plan:

Name:	Jasdeep Dhaliwal
Position:	Chemical Technologist
Address:	1265 Fewster Drive, Mississauga, Ontario
Phone Number:	(905)-625-0311, Ext. 224
Fax Number:	(905)-624-1109
E-mail:	jdhaliwal@dodgecan.com

Person Who Prepared the Plan:

Name:	Philip Yu
Position:	Consultant
Address:	6605 Hurontario Street, Suite 400, Mississauga, Ontario
Phone Number:	(905)-454-6920
Fax Number:	(905)-454-6988
E-mail:	Philip.yu@ccc-group.com

Planner Responsible for Making Recommendations:

Name:	Philip Yu
Position:	Consultant
Address:	6605 Hurontario Street, Suite 400, Mississauga, Ontario
Phone Number:	(905)-454-6920
Fax Number:	(905)-454-6988
E-mail:	Philip.yu@ccc-group.com

Planner Responsible for Certification:

Name:	Philip Yu
Position:	Consultant
Address:	6605 Hurontario Street, Suite 400, Mississauga, Ontario
Phone Number:	(905)-454-6920
Fax Number:	(905)-454-6988
E-mail:	Philip.yu@ccc-group.com

Number of full time employees: 10

Substance Information:

Toxic Substance(s) for which this plan is required: Formaldehyde (CAS# 50-00-0). It is the key raw material used in the manufacture of embalming chemical for its effectiveness in preserving and firming of the bodies.

Statement of Intent:

The Dodge Company (Canada) is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of Formaldehyde in full compliance with all applicable regulations. Toxic substance reduction will be an ongoing effort at Dodge, and we will continue to monitor technological advancements and market conditions to ensure that options that are both technically and economically feasible are implemented at this facility.

Objectives:

The Dodge Company prides itself on the quality and effectiveness of its products. Over the past years, Dodge has eliminated/reduced Formaldehyde use in some of its products through reformulation. Efforts will continue to be made in the future to eliminate or reduce Formaldehyde contents in our products as opportunities arise. Any such items and elimination/reduction, where technically and economically feasible, will be implemented and captured in our future annual plan updates.

Options for Reduction:

No option is to be implemented.

- There are no direct replacements for Formaldehyde available in the market place. No options under this category are identified.
- The Dodge Company has reformulated a number of products in the past with reduced or zero Formaldehyde contents. Efforts will continue to be made in the future to eliminate or reduce Formaldehyde contents in our products as opportunities arise. No specific products are targeted for Formaldehyde elimination or reduction for this facility at this time.
- Formaldehyde index (% contents in embalming products) is part of the final product specifications to ensure their effectiveness. Changes in equipment or processes used to manufacture these products will not result in the reduction of Formaldehyde contents, hence the quantity used for manufacturing, in the final products.
- There were no reportable spills in 2011. No options were identified for spill & leak prevention.
- On-site recycling of residual products in production and rinsed water has been in place for at least 15 years. No additional options under this category are identified.
- Formaldehyde 37% solution with 7-9% Methanol has no finite shelf life and storing it in an indoor bulk storage tank over a reasonable period of storage time has no impact on the quality of the product. Changes in inventory management and purchasing method will not result in reduction of Formaldehyde used or purchased.
- Employee training in Formaldehyde handling has been in place since the inception of the processes involving this material. These include relevant standard Operating Procedures and WHMIS training. These training are regularly conducted per company policy and applicable

legal requirements. As there are no additional options identified in this plan, no additional training requirements are identified for implementation.

Targets:

No specific targets for Formaldehyde elimination or reduction are set for this facility at this time.

Additional Information (optional):

The Dodge Company has been concerned about the amount of Formaldehyde used in our products for a number of years. Our Chemists have continually looked for opportunities to reduce the amounts of Formaldehyde used wherever they can through reformulation of our finished products while maintaining their quality and effectiveness.

A total reduction of 4,817.40 kg. of Formaldehyde use has been achieved since 2008.

Substance Accounting (2011):

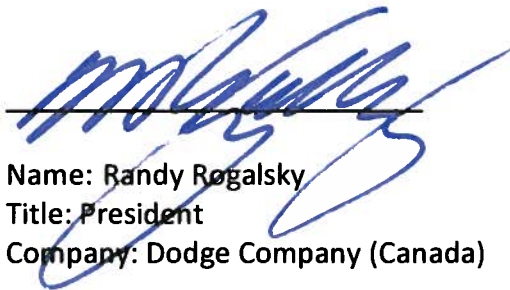
Formaldehyde (CAS# 50-00-0)	Tonnes
Used	20.7681
Created	0.00
Contained in Products	20.7651
Onsite Release to Air	0.0030
Offsite Transfers for Disposal	0.00

9. Plan Certifications:

9.1 Certification by Highest Ranking Employee:

As of November 30th, 2012, I, Randy Rogalsky, 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 the Act.

Formaldehyde


Name: Randy Rogalsky
Title: President
Company: Dodge Company (Canada)

November 30, 2012

Date

9.2 Certification by licensed Planner:

As of November 30th, 2012, I, Philip Yu, certify that I am familiar with the processes at Dodge Company (Canada) that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 ii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 1st, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Formaldehyde


Philip Yu (License# TSRP0008)
Consultant

November 30, 2012

Date