

Plan Summary – Methanol

Facility Identification & Site Address:

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| 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):

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| 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:

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| 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:

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|---------------|--|
| 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:

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|---------------|--|
| 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:

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|---------------|--|
| 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:

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| 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:

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|---------------|---|
| 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:

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|---------------|---|
| 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: Methanol (CAS# 67-56-1). It is used as a solvent in our products and to keep the finished from freezing in the winter.

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 Methanol 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 Methanol use in some of its products through reformulation. Efforts will continue to be made in the future to eliminate or reduce Methanol 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 Reductions:

No option is to be implemented.

- An alternative could be IPA (Isopropyl Alcohol), but again the cost is 2.5 times more than Methanol. Due to high costs, there is limited market acceptance. No options under this category are identified.
- The Dodge Company has reformulated a number of products in the past with reduced methanol contents. Efforts will continue to be made in the future to eliminate or reduce methanol contents in our products as opportunities arise. No specific products are targeted for methanol reduction for this facility at this time.
- Methanol 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 methanol 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.
- 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 methanol used or purchased.
- Employee training in methanol 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 Methanol elimination or reduction are set for this facility at this time.

Additional Information (Optional):

A total reduction of 5,045 kg. of Methanol uses has been achieved through reformulation over the last 5 years. A certain amount of Methanol must be there to keep the products in liquid state especially in the winter months.

Substance Accounting (2011):

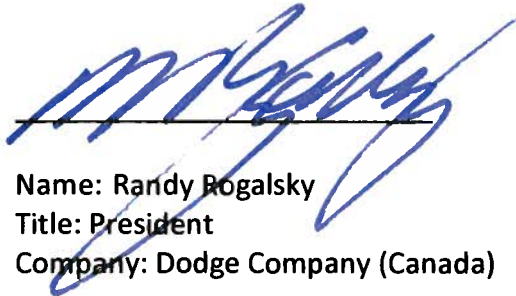
| Methanol (CAS# 67-56-1) | Tonnes |
|--------------------------------|---------------|
| Used | 15.7472 |
| Created | 0.00 |
| Contained in Products | 15.7410 |
| Onsite Release to Air | 0.00620 |
| Offsite Transfers for Disposal | 0.00 |

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.

Methanol



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.

Methanol



Philip Yu (License# TSRP0008)
Consultant

November 30, 2012

Date