

# FCA Canada Inc. Brampton Assembly Plant

TRA Plan Summary December 2012



# Public Reporting Under O. Reg. 455/09 Public Plan Summary

Chrysler Canada Inc.
Brampton Assembly Plant

December 14, 2012



### **ENVIRONMENTAL REPORTING:**

The National Pollution Release Inventory (NPRI) is Canada's legislated, publically accessible inventory of releases (to air, water and land), disposals and transfers for recycling that are associated with industrial activity. Over 84,000 facilities report to the NPRI on more than 300 listed substances. Chrysler Canada Inc. has been reporting in accordance with federal NPRI regulations since its inception in 1992.

Additionally, beginning in 2010, the Toxics Reduction Act requires certain facilities in Ontario to prepare and publish toxic substance reduction plans, though implementation of the plans is voluntary. The first report under the Toxic Reduction Act and Ontario Regulation 455/09 was required in June 2011.

Regulation 455 requires facilities to report on their use and creation of certain "substances of concern". Currently the list of substances of concern under the Toxics Reduction Act includes all of the substances on the NPRI list. Therefore, in addition to reporting releases, disposals and transfers of substances listed under NPRI, Ontario facilities must report on their use and creation of these substances along with the amount of the substance contained in each product.

Vehicles are made by all manufacturers in a similar manner globally. All vehicles sold in Canada must meet the same consumer performance expectations for the Canadian market as for export markets where they are sold. To meet these expectations, many of the substances listed in Ontario Regulation 455/09 as "substances of concern" are utilized in the manufacture of all vehicles, including those assembled elsewhere and imported to Ontario for sale.



# **BASIC FACILITY INFORMATION**

BASIC FACILITY INFORMAT	ΓΙΟΝ				
Substances Included in the Plan					
<ul> <li>Sulphuric Acid (7446-60-6)</li> </ul>	■ Zinc (CAS No. 7440-66-6)				
<ul> <li>Xylene (CAS No. 1330-20-7)</li> </ul>	<ul><li>Methanol (CAS No. 67-56-1)</li></ul>				
Facility Identification and Site Address					
Company Name	Chrysler Canada Inc.				
Facility Name	Brampton Assembly Plant				
	Physical Address:	Mailing Address:			
Facility Address	2000 Williams Parkway Brampton, ON L6S 6B3	Same as physical address			
Spatial Coordinates of Facility	UTM Northing 4844800, UTM Easting 602600 (NAD 1983)				
Number of Employees	4355				
NPRI ID	4173				
Primary North American Industrial Classification System Code (NAICS)					
2 Digit NAICS Code	31-33 (Manufacturing)				
4 Digit NAICS Code	3361 (Motor Vehicle Manufacturing)				
6 Digit NAICS Code	336110 (Automotive and Light Duty Motor Vehicle Manufacturing)				
Facility and Planner Contact Information					
Facility Public Contact	Sue Forest Email: sf3@chrysler.com	Chrysler Canada Inc. 3939 Rhodes Drive CIMS 242-01-03			
	Phone: (519) 973-2864	Windsor, On N9A 4H6			



### **EXISTING ENVIRONMENTAL MANAGEMENT SYSTEMS**

Chrysler Canada Inc. is committed to the responsible management of all of its facilities and operations. This includes a proactive approach towards protecting public health and the natural environment through existing and planned environmental and sustainability initiatives. All Canadian operations have implemented comprehensive environmental management systems including Pollution Prevention commitments through World Class Manufacturing (WCM) and ISO 14001 certified Environmental Management Systems. Through these initiatives, each Chrysler facility intends to reduce or minimize its use and/or creation of each listed substance wherever possible. More specifically, the Brampton Assembly Plant (BAP) is dedicated to reducing its use and creation of toxic substances by continually striving for operational and process efficiency, innovation, and conservation.

In fact, Chrysler Group LLC as a whole has adopted a global approach such that each facility has defined a standard process-based Environment Management System that identifies a process for continuous improvement, ongoing measurement of metrics tracked through scorecards and use of objective statements. The key to the success of the ISO 14001 is that metrics are reviewed by a third party accredited body to ensure that the Environment Management Systems strive for continuous improvement, meet or exceed regulatory standards and document all activities in accordance with the procedures outlined in the system.

As an example of the continuous improvement efforts that have been implemented within BAP, the following graph outlines the trends of total VOCs releases to air (in tonnes). The trend shows data from 2005 to 2011 and highlights that BAP has already reduced VOCs releases from peak historical periods by 52%.



Figure 2.2: Historical VOC Air Release Trends



### PLAN SUMMARY FOR EACH SUBSTANCE

### **SULPHURIC ACID (CAS NO. 7446-60-6)**

### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

BAP does not intend to implement a reduction option for Sulphuric Acid. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements in an effort to reduce Sulphuric Acid in the future.

### **Description of Used of Substance**

Sulphuric Acid is used for pH control in the water treatment facility and cleaning of the phosphate system tanks.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Sulphuric Acid, dated December 14, 2012



### **ZINC (CAS NO. 7440-66-6)**

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substance wherever possible.

### **Objectives**

Brampton Assembly Plant (BAP) does not intend to implement a reduction option for Zinc. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements in an effort to reduce Zinc in the future.

### **Description of Used of Substance**

Zinc is contained with the metal used to manufacture automobiles, and a component of sealers and rust inhibitors.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation is choosing not to implement any of the options. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Zinc, dated December 14, 2012



### **XYLENE (CAS NO. 1330-20-7)**

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Xylene. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of xylene.

### **Description of Used of Substance**

Xylene is a component of coatings, adhesives and sealers used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Xylene. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Xylene, dated December 14, 2012



### **METHANOL (CAS NO. 67-56-1)**

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Methanol. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Methanol.

### **Description of Used of Substance**

Methanol is the main component within windshield washer fluid as well as a component of coatings, adhesives.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Methanol. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Methanol, dated December 14, 2012



### Certification by Highest Ranking Employee

As of December 14, 2012, I, Kevin Hayes, 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.

3

Substance	Date of Certified Plan
■ Sulphuric Acid (CAS No. 7440-60-6)	December 14, 2012
■ Xylene (CAS 1330-20-7)	December 14, 2012
■ Methanol (CAS 67-56-1)	December 14, 2012
■ Zinc (CAS 7440-66-6)	December 14, 2012

### SIGNED

signature redacted for privacy purposes per O.Reg 455/09 a signature in a certification may be redacted and replaced with an indication that the original was signed. O. Reg. 295/18, s. 2 (2).

Kevin Hayes Plant Manager Chrysler Canada Inc. Brampton Assembly Plant



### **Certification by Licensed Planner**

As of December 14, 2012, I, Mark Vanderheyden, certify that I am familiar with the processes at Brampton Assembly Plant 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 toxic substance reduction plans referred to below for the toxic substances and that the plans comply with the Act and Ontario Regulation 455/09 (General) made under that Act.

Substance	Date of Certified Plan
■ Sulphuric Acid (CAS No. 7440-60-6)	December 14, 2012
■ Xylene (CAS 1330-20-7)	December 14, 2012
■ Methanol (CAS 67-56-1)	December 14, 2012
■ Zinc (CAS 7440-66-6)	December 14, 2012



Mark Vanderheyden, Planner License #0241 Project Director / Toxic Substance Reduction Planner RWDI AIR Inc.



# FCA Canada Inc. Brampton Assembly Plant

TRA Plan Summary December 2013



# Public Reporting Under O. Reg. 455/09 Public Plan Summary

Chrysler Canada Inc.
Brampton Assembly Plant

December 16, 2013



### **ENVIRONMENTAL REPORTING:**

The National Pollution Release Inventory (NPRI) is Canada's legislated, publically accessible inventory of releases (to air, water and land), disposals and transfers for recycling that are associated with industrial activity. Over 84,000 facilities report to the NPRI on more than 300 listed substances. Chrysler Canada Inc. has been reporting in accordance with federal NPRI regulations since its inception in 1992.

Additionally, beginning in 2010, the Toxics Reduction Act requires certain facilities in Ontario to prepare and publish toxic substance reduction plans, though implementation of the plans is voluntary. The first report under the Toxic Reduction Act and Ontario Regulation 455/09 was required in June 2011.

Regulation 455 requires facilities to report on their use and creation of certain "substances of concern". Currently the list of substances of concern under the Toxics Reduction Act includes all of the substances on the NPRI list. Therefore, in addition to reporting releases, disposals and transfers of substances listed under NPRI, Ontario facilities must report on their use and creation of these substances along with the amount of the substance contained in each product.

Vehicles are made by all manufacturers in a similar manner globally. All vehicles sold in Canada must meet the same consumer performance expectations for the Canadian market as for export markets where they are sold. To meet these expectations, many of the substances listed in Ontario Regulation 455/09 as "substances of concern" are utilized in the manufacture of all vehicles, including those assembled elsewhere and imported to Ontario for sale.



# **BASIC FACILITY INFORMATION**

BASIC FACILITY INFORMATION					
Substances Included in the Plan					
■ Methyl Isobutyl Ketone (CAS No. 108-10-1)		N-Butyl Alcohol (CAS No. 71-36-3)			
■ Toluene (CAS No. 108-88-3)					
■ Tetrahydrofuran (CAS No. 109-99-9)	<ul><li>Methyleneb (CAS No. 1</li></ul>	is(Phenyl)Isocyanate 01-68-8)			
<ul><li>2-Butoxyethanol (CAS No. 111-76-2)</li></ul>	■ Ethylene GI (CAS No. 1	07-21-1)			
■ Diethylene Glycol Butyl Ether (CAS No. 112-34-5)	■ n-Methyl-2- (CAS No. 8	7 <u>2</u> -50-4)			
■ N-Butyl Acetate (CAS No. 123-86-4)	<ul><li>Sodium Nitrite (CAS No. 7632-00-0)</li></ul>				
Propylene Glycol Butyl Ether (CAS No. 5131-66-8)	■ Nitric Acid (CAS No. 7	•			
■ D-Limonene (CAS No. 5989-27-5)	<ul><li>Nitrate Compounds (CAS No. NA -17)</li></ul>				
Hydrotreated Heavy Naphtha (CAS No. 64742-48-9)	(CAS No. NA-22)				
Solvent Naphtha Medium Aliphati (CAS No. 64742-88-7)	(CAS No. 9	(CAS No. 9016-87-9)			
■ Solvent Naphtha Light Aliphatic Carbon Mc (CAS No. 64742-89-8) (CAS No. 6		30-08-0)			
(CAS No. 64742-94-5) NO <sub>2</sub>		Nitrogen Oxides (expressed as NO2) (CAS No. 11104-93-1)			
(CAS No. 64742-95-6)					
■ Isopropyl Alcohol (CAS No. 67-63-0)	■ PM <sub>2.5</sub> — Particulate Matter <= 2.5 Microns (CAS No. NA-M10)				
<ul><li>1,2,4-Trimethylbenzene (CAS No. 95-63-6)</li></ul>	■ Total Particulate Matter (CAS No. NA-M08)				
Facili	ty Identification and Site Addre	ess			
Company Name	Chrysler Canada Inc.				
Facility Name	·	Assembly Plant			
	Physical Address:	Mailing Address:			
Facility Address	2000 Williams Parkway Brampton, ON L6S 6B3	Same as physical address			
Spatial Coordinates of Facility	UTM Northing 4844800, UTM Easting 602600 (NAD 1983)				
Number of Employees	3600				
NPRI ID	4173				



BASIC FACILITY INFORMATION				
Primary North American Industrial Classification System Code (NAICS)				
2 Digit NAICS Code	31-33 (Manufacturing)			
4 Digit NAICS Code	3361 (Motor Vehicle Manufacturing)			
6 Digit NAICS Code	336110 (Automotive and Light Duty Motor Vehicle Manufacturing)			
Facility and Planner Contact Information				
	Sue Forest	Chrysler Canada Inc.		
Facility Public Contact	Email: sf3@chrysler.com Phone: (519) 973-2864	3939 Rhodes Drive CIMS 242- 01-03 Windsor, On N9A 4H6		



### **EXISTING ENVIRONMENTAL MANAGEMENT SYSTEMS**

Chrysler Canada Inc. is committed to the responsible management of all of its facilities and operations. This includes a proactive approach towards protecting public health and the natural environment through existing and planned environmental and sustainability initiatives. All Canadian operations have implemented comprehensive environmental management systems including Pollution Prevention commitments through World Class Manufacturing (WCM) and ISO 14001 certified Environmental Management Systems. Through these initiatives, each Chrysler facility intends to reduce or minimize its use and/or creation of each listed substance wherever possible. More specifically, the Brampton Assembly Plant (BAP) is dedicated to reducing its use and creation of toxic substances by continually striving for operational and process efficiency, innovation, and conservation.

In fact, Chrysler Group LLC as a whole has adopted a global approach such that each facility has defined a standard process-based Environment Management System that identifies a process for continuous improvement, ongoing measurement of metrics tracked through scorecards and use of objective statements. The key to the success of the ISO 14001 is that metrics are reviewed by a third party accredited body to ensure that the Environment Management Systems strive for continuous improvement, meet or exceed regulatory standards and document all activities in accordance with the procedures outlined in the system.



As an example of the continuous improvement efforts that have been implemented within BAP, the following graph outlines the trends of total VOCs releases to air (in tonnes). The trend shows data from 2005 to 2012 and highlights that BAP has already reduced VOCs releases from peak historical periods by 52%.

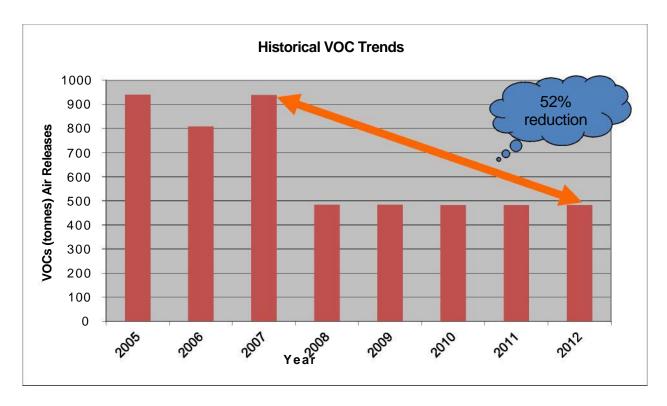


Figure 1: Historical VOC Air Release Trends



As another example of the continuous improvement efforts that have been implemented within BAP, the following graph outlines the trends of total Natural Gas usage in GJ (creation of CACs) releases to air. The trend shows data from 2002 to 2012 (excluding 2006 and 2007) and highlights that BAP has already reduced natural gas usage from peak historical periods by 32%.

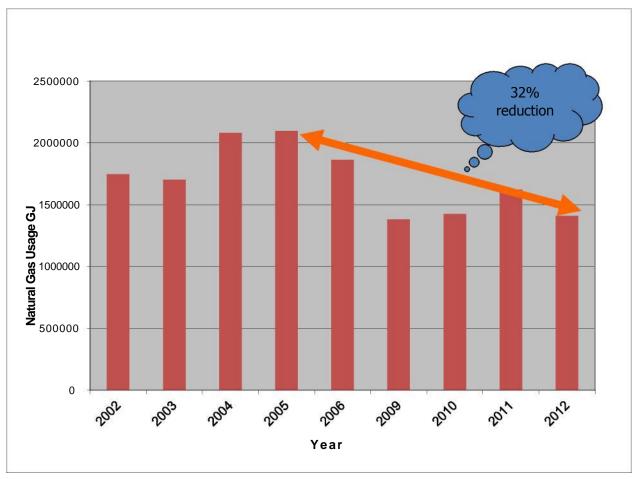


Figure 2: Historical Natural Gas Usage Trends



### PLAN SUMMARY FOR EACH SUBSTANCE

### **METHYL ISOBUTYL KETONE (CAS NO. 108-10-1)**

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Methyl Isobutyl Ketone through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Methyl Isobutyl Ketone.

### **Description of Used of Substance**

Methyl Isobutyl Ketone is a component of purge solvent used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Methyl Isobutyl Ketone. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Methyl Isobutyl Ketone, dated December 16, 2013



### **TOLUENE (CAS NO. 108-88-3)**

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Toluene through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of toluene.

### **Description of Used of Substance**

Toluene is a component of coatings and purge solvent used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Toluene. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Toluene, dated December 16, 2013



# TETRAHYDROFURAN (CAS NO. 109-99-9)

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Tetrahydrofuran through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Tetrahydrofuran.

### **Description of Used of Substance**

Tetrahydrofuran is a component of coatings used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Tetrahydrofuran. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Tetrahydrofuran, dated December 16, 2013



### 2-BUTOXYETHANOL (CAS NO. 111-76-2)

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to 2-Butoxyethanol through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of 2-Butoxyethanol.

### **Description of Used of Substance**

2-Butoxyethanol is a component within of coatings and cleaning solutions used during the manufacturing process at the Facility.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of 2-Butoxyethanol. BAP will continue to investigate processefficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for 2-Butoxyethanol, dated December 16, 2013



# **DIETHYLENE GLYCOL BUTYL ETHER (CAS NO. 112-34-5)**

### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Diethylene Glycol Butyl Ether through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Diethylene Glycol Butyl Ether.

### **Description of Used of Substance**

Diethylene Glycol Butyl Ether is a component of coatings and cleaning solutions used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Diethylene Glycol Butyl Ether. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Diethylene Glycol Butyl Ether, dated December 16, 2013



### N-BUTYL ACETATE (CAS NO. 123-86-4)

### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to N-Butyl Acetate through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of N-Butyl Acetate.

### **Description of Used of Substance**

N-Butyl Acetate is a component of coatings and purge solutions used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of N-Butyl Acetate. BAP will continue to investigate processefficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for N-Butyl Acetate, dated December 16, 2013



### PROPYLENE GLYCOL BUTYL ETHER (CAS NO. 5131-66-8)

### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Propylene Glycol Butyl Ether through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Propylene Glycol Butyl Ether.

### **Description of Used of Substance**

Propylene Glycol Butyl Ether is a component of coatings used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Propylene Glycol Butyl Ether. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Propylene Glycol Butyl Ether, dated December 16, 2013



# **D-LIMONENE (CAS NO. 5989-27-5)**

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to D-Limonene through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of D-Limonene.

### **Description of Used of Substance**

D-Limonene is a component of coatings and cleaning products used for the manufacturing of automobiles.

#### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of D-Limonene. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for D-Limonene, dated December 16, 2013



# **HYDROTREATED HEAVY NAPHTHA (CAS NO. 64742-48-9)**

### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Hydrotreated Heavy Naphtha through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Hydrotreated Heavy Naphtha.

### **Description of Used of Substance**

Hydrotreated Heavy Naphtha is a component of coatings used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Hydrotreated Heavy Naphtha. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Hydrotreated Heavy Naphtha, dated December 14, 2012



# SOLVENT NAPHTHA MEDIUM ALIPHATIC (CAS NO. 64742-88-7)

### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Solvent Naphtha Medium Aliphatic through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Solvent Naphtha Medium Aliphatic.

### **Description of Used of Substance**

Solvent Naphtha Medium Aliphatic is a component of coatings used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Solvent Naphtha Medium Aliphatic. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Solvent Naphtha Medium Aliphatic, dated December 16, 2013



### **SOLVENT NAPHTHA LIGHT ALIPHATIC (CAS NO. 64742-89-8)**

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Solvent Naphtha Light Aliphatic through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Solvent Naphtha Light Aliphatic.

### **Description of Used of Substance**

Solvent Naphtha Light Aliphatic is a component of coatings and purge solutions used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Solvent Naphtha Light Aliphatic. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Solvent Naphtha Light Aliphatic, dated December 16, 2012



# **HEAVY AROMATIC SOLVENT NAPHTHA (CAS NO. 64742-94-5)**

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Heavy Aromatic Solvent Naphtha through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Heavy Aromatic Solvent Naphtha.

### **Description of Used of Substance**

Heavy Aromatic Solvent Naphtha is a component of coatings, adhesives and sealers used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Heavy Aromatic Solvent Naphtha. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Heavy Aromatic Solvent Naphtha, dated December 16, 2013



### LIGHT AROMATIC SOLVENT NAPHTHA (CAS NO. 64742-95-6)

### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Light Aromatic Solvent Naphtha through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Light Aromatic Solvent Naphtha.

### **Description of Used of Substance**

Light Aromatic Solvent Naphtha is a component of coatings, adhesives and sealers used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Light Aromatic Solvent Naphtha. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Light Aromatic Solvent Naphtha, dated December 16, 2013



### **ISOPROPYL ALCOHOL (CAS NO. 67-63-0)**

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Isopropyl Alcohol through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Isopropyl Alcohol.

### **Description of Used of Substance**

Isopropyl Alcohol is a component of coatings and purge solutions used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Isopropyl Alcohol. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Isopropyl Alcohol, dated December 16, 2013



### 1,2,4-TRIMETHYLBENZENE (CAS NO. 95-63-6)

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to 1,2,4-Trimethylbenzene through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of 1,2,4-Trimethylbenzene.

### **Description of Used of Substance**

1,2,4-Trimethylbenzene is a component of coatings and purge solution used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of 1,2,4-Trimethylbenzene. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for 1,2,4-Trimethylbenzene, dated December 16, 2013



### N-BUTYL ALCOHOL (CAS NO. 71-36-3)

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to N-Butyl Alcohol through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of N-Butyl Alcohol.

### **Description of Used of Substance**

N-Butyl Alcohol is a component of coatings and purge solutions used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of N-Butyl Alcohol. BAP will continue to investigate processefficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for N-Butyl Alcohol, dated December 16, 2013



### **ISOBUTYL ALCOHOL (CAS NO. 78-83-1)**

### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Isobutyl Alcohol through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Isobutyl Alcohol.

### **Description of Used of Substance**

Isobutyl Alcohol is a component of coatings and purge solution used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Isobutyl Alcohol. BAP will continue to investigate processefficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Isobutyl Alcohol, dated December 16, 2013



### **METHYLENEBIS(PHENYL)ISOCYANATE (CAS NO. 101-68-8)**

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Methylenebis(Phenyl)Isocyanate through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Methylenebis(Phenyl)Isocyanate.

### **Description of Used of Substance**

Methylenebis(Phenyl)Isocyanate is a component of window primer and Closed Cell Foam application used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Methylenebis(Phenyl)Isocyanate. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Methylenebis(Phenyl)Isocyanate, dated December 16, 2013



### ETHYLENE GLYCOL (CAS NO. 107-21-1)

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Ethylene Glycol through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Ethylene Glycol.

### **Description of Used of Substance**

Ethylene Glycol is a component of coatings, adhesives and anti-freeze used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Ethylene Glycol. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Ethylene Glycol, dated December 16, 2013



### N-METHYL-2-PYRROLIDONE (CAS NO. 872-50-4)

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to n-Methyl-2-Pyrrolidone through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of n-Methyl-2-Pyrrolidone.

### **Description of Used of Substance**

n-Methyl-2-Pyrrolidone is a component of coatings, adhesives and sealers used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of n-Methyl-2-Pyrrolidone. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for n-Methyl-2-Pyrrolidone, dated December 16, 2013



### **SODIUM NITRITE (CAS NO. 7632-00-0)**

#### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Sodium Nitrite through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOC's, Energy, Water, etc., which may result in reduction in use or discharge of Sodium Nitrite.

### **Description of Used of Substance**

Sodium Nitrite is a component of phosphate and phosphate equipment cleaning used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOC's, Energy, Water, etc., which may result in reduction in the use or discharge of Sodium Nitrite. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Sodium Nitrite, dated December 16, 2013



### **NITRIC ACID (CAS NO. 7697-37-2)**

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Nitric Acid through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOC's, Energy, Water, etc., which may result in reduction in use or discharge of Nitric Acid.

### **Description of Used of Substance**

Nitric Acid is a component of phosphate and phosphate equipment cleaning used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOC's, Energy, Water, etc., which may result in reduction in the use or discharge of Nitric Acid. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Nitric Acid, dated December 16, 2013



### **NITRATE COMPOUNDS (CAS NO. NA -17)**

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Nitrate Compounds through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOC's, Energy, Water, etc., which may result in reduction in use or discharge of Nitrate Compounds.

### **Description of Used of Substance**

Nitrate Compounds is a component of phosphate and water treatment solutions used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOC's, Energy, Water, etc., which may result in reduction in the use or discharge of Nitrate Compounds. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Nitrate Compounds, dated December 16, 2013



### **TOTAL PHOSPHORUS (CAS NO. NA-22)**

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Total Phosphorus through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOC's, Energy, Water, etc., which may result in reduction in use or discharge of Total Phosphorus.

### **Description of Used of Substance**

Total Phosphorus is a component of phosphate and phosphate equipment cleaning used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOC's, Energy, Water, etc., which may result in reduction in the use or discharge of Total Phosphorus. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Total Phosphorus, dated December 16, 2013



# POLYMERIC DIPHENYLMETHANE DIISOCYANATE (CAS NO. 9016-87-9)

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Polymeric Diphenylmethane Diisocyanate through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Polymeric Diphenylmethane Diisocyanate.

### **Description of Used of Substance**

Polymeric Diphenylmethane Diisocyanate is a component of Closed Cell Foam application used for the manufacturing of automobiles.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Polymeric Diphenylmethane Diisocyanate. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Polymeric Diphenylmethane Diisocyanate, dated December 16, 2013



### **CARBON MONOXIDE (CAS NO. 630-08-0)**

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the creation of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Carbon Monoxide through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total CAC as a class, which may result in reduction in use or discharge of Carbon Monoxide.

### **Description of Used of Substance**

Carbon Monoxide is created from natural gas combustion.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total Energy Conversation as a class, which may result in reduction in the use or discharge of Carbon Monoxide. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Carbon Monoxide, dated December 16, 2013



### NITROGEN OXIDES (EXPRESSED AS NO2) (CAS NO. 11104-93-1)

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the creation of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Nitrogen Oxides through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total CACs as a class, which may result in reduction in use or discharge of Nitrogen Oxides.

### **Description of Used of Substance**

Nitrogen Oxides is created from the combustion of natural gas.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total Energy Conversation as a class, which may result in reduction in the use or discharge of Nitrogen Oxide. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Nitrogen Oxides, dated December 16, 2013



### PM<sub>10</sub> - PARTICULATE MATTER <= 10 MICRONS (CAS NO. NA-M09)

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the creation of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to  $PM_{10}$  – Particulate Matter through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total CAC as a class, which may result in reduction in use or discharge of  $PM_{10}$  – Particulate Matter.

### **Description of Used of Substance**

PM<sub>10</sub> – Particulate Matter is a created through the combustion of natural gas, within the BIW process from sanding, grinding and welding and through the application of the coatings.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total Energy Conversation as a class, which may result in reduction in the use or discharge of PM<sub>10</sub> — Particulate Matter. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for PM<sub>10</sub>— Particulate Matter, dated December 16, 2013



### PM<sub>2.5</sub> - PARTICULATE MATTER <= 2.5 MICRONS (CAS NO. NA-M10)

#### Statement of Intent

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the creation of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to  $PM_{2.5}$  — Particulate Matter through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total CACs as a class, which may result in reduction in use or discharge of  $PM_{2.5}$  — Particulate Matter.

### **Description of Used of Substance**

PM<sub>2.5</sub> – Particulate Matter is a created through the combustion of natural gas, within the BIW process from sanding, grinding and welding and through the application of the coatings.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total Energy Conversation as a class, which may result in reduction in the use or discharge of PM2.5 — Particulate Matter. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for PM<sub>2.5</sub>— Particulate Matter, dated December 16, 2013



### **TOTAL PARTICULATE MATTER (CAS NO. NA-M08)**

#### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the creation of the listed substances wherever possible.

### **Objectives**

Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Total Particulate Matter through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total CAC as a class, which may result in reduction in use or discharge of Total Particulate Matter.

### **Description of Used of Substance**

Total Particulate Matter is a created through the combustion of natural gas, within the BIW process from sanding, grinding and welding and through the application of the coatings.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total Energy Conversation as a class, which may result in reduction in the use or discharge of Total Particulate Matter. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Total Particulate Matter, dated December 16, 2013



### 8.1 Certification by Highest Ranking Employee

As of December 16, 2013, I, Kevin Hayes, 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.

<u>Substance</u> <u>Date of Certified Plan</u>				
•	Methyl Isobutyl Ketone (CAS No. 108-10-1)	December 16, 2013		
	Toluene (CAS No. 108-88-3)	December 16, 2013		
	Tetrahydrofuran (CAS No. 109-99-9)	December 16, 2013		
	2-Butoxyethanol (CAS No. 111-76-2)	December 16, 2013		
	Diethylene Glycol Butyl Ether (CAS No. 112-34-5)	December 16, 2013		
	N-Butyl Acetate (CAS No. 123-86-4)	December 16, 2013		
	Propylene Glycol Butyl Ether (CAS No. 5131-66-8)	December 16, 2013		
	D-Limonene (CAS No. 5989-27-5)	December 16, 2013		
	Hydrotreated Heavy Naphtha (CAS No. 64742-48-9)	December 16, 2013		
	Solvent Naphtha Medium Aliphatic (CAS No. 64742-88-7)	December 16, 2013		
	Solvent Naphtha Light Aliphatic (CAS No. 64742-89-8)	December 16, 2013		
	Heavy Aromatic Solvent Naphtha (CAS No. 64742-94-5)	December 16, 2013		
	Light Aromatic Solvent Naphtha (CAS No. 64742-95-6)	December 16, 2013		
	Isopropyl Alcohol (CAS No. 67-63-0)	December 16, 2013		
	1,2,4-Trimethylbenzene (CAS No. 95-63-6)	December 16, 2013		
	N-Butyl Alcohol (CAS No. 71-36-3)	December 16, 2013		
	Isobutyl Alcohol (CAS No. 78-83-1)	December 16, 2013		
	Methylenebis(Phenyl)Isocyanate (CAS No. 101-68-8)	December 16, 2013		
	Ethylene Glycol (CAS No. 107-21-1)	December 16, 2013		
	n-Methyl-2-Pyrrolidone (CAS No. 872-50-4)	December 16, 2013		
	Sodium Nitrite (CAS No. 7632-00-0)	December 16, 2013		
	Nitric Acid (CAS No. 7697-37-2)	December 16, 2013		
	Nitrate Compounds (CAS No. NA -17)	December 16, 2013		
	Total Phosphorus (CAS No. NA-22)	December 16, 2013		
	Polymeric Diphenylmethane Diisocyanate (CAS No. 9016-87-9)	December 16, 2013		
	Carbon Monoxide (CAS No. 630-08-0)	December 16, 2013		
	Nitrogen Oxides (expressed as NO <sub>2</sub> ) (CAS No. 11104-93-1)	December 16, 2013		
	PM <sub>10</sub> – Particulate Matter <= 10 Microns (CAS No. NA-M09)	December 16, 2013.		
	PM <sub>2.5</sub> – Particulate Matter <= 2.5 Microns (CAS No. NA-M10)	December 16, 2013		
•	Total Particulate Matter (CAS No. NA-M08)	December 16, 2013		

/SIGNED

signature redacted for privacy purposes per O.Reg 455/09 a signature in a certification may be redacted and replaced with a indication that the original was signed. O. Reg. 295/18, x. 2 (2).

Kevin Hayes 'Plant Manager Chrysler Canada Inc. Brampton Assembly Plant



### 8.2 Certification by Licensed Planner

As of December 16, 2013, I, Brad Bergeron, certify that I am familiar with the processes at Brampton Assembly Plant 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 toxic substance reduction plans referred to below for the toxic substances and that the plans comply with the Act and Ontario Regulation 455/09 (General) made under that Act.

Su	<u>bstance</u>	Date of Certified Plan
•	Methyl Isobutyl Ketone (CAS No. 108-10-1)	December 16, 2013
•	Toluene (CAS No. 108-88-3)	December 16, 2013
•	Tetrahydrofuran (CAS No. 109-99-9)	December 16, 2013
•	2-Butoxyethanol (CAS No. 111-76-2)	December 16, 2013
•	Diethylene Glycol Butyl Ether (CAS No. 112-34-5)	December 16, 2013
•	N-Butyl Acetate (CAS No. 123-86-4)	December 16, 2013
•	Propylene Glycol Butyl Ether (CAS No. 5131-66-8)	December 16, 2013
•	D-Limonene (CAS No. 5989-27-5)	December 16, 2013
•	Hydrotreated Heavy Naphtha (CAS No. 64742-48-9)	December 16, 2013
•	Solvent Naphtha Medium Aliphatic (CAS No. 64742-88-7)	December 16, 2013
•	Solvent Naphtha Light Aliphatic (CAS No. 64742-89-8)	December 16, 2013
•	Heavy Aromatic Solvent Naphtha (CAS No. 64742-94-5)	December 16, 2013
•	Light Aromatic Solvent Naphtha (CAS No. 64742-95-6)	December 16, 2013
•	Isopropyl Alcohol (CAS No. 67-63-0)	December 16, 2013
•	1,2,4-Trimethylbenzene (CAS No. 95-63-6)	December 16, 2013
•	N-Butyl Alcohol (CAS No. 71-36-3)	December 16, 2013
•	Isobutyl Alcohol (CAS No. 78-83-1)	December 16, 2013
•	Methylenebis(Phenyl)Isocyanate (CAS No. 101-68-8)	December 16, 2013
•	Ethylene Glycol (CAS No. 107-21-1)	December 16, 2013
•	n-Methyl-2-Pyrrolidone (CAS No. 872-50-4)	December 16, 2013
•	Sodium Nitrite (CAS No. 7632-00-0)	December 16, 2013
•	Nitric Acid (CAS No. 7697-37-2)	December 16, 2013
•	Nitrate Compounds (CAS No. NA -17)	December 16, 2013
•	Total Phosphorus (CAS No. NA-22)	December 16, 2013
•	Polymeric Diphenylmethane Diisocyanate (CAS No. 9016-87-9)	December 16, 2013
•	Carbon Monoxide (CAS No. 630-08-0)	December 16, 2013
•	Nitrogen Oxides (expressed as NO <sub>2</sub> ) (CAS No. 11104-93-1)	December 16, 2013
•	PM <sub>10</sub> – Particulate Matter <= 10 Microns (CAS No. NA-M09)	December 16, 2013
•	PM <sub>2.5</sub> – Particulate Matter <= 2.5 Microns (CAS No. NA-M10)	December 16, 2013
•	Total Particulate Matter (CAS No. NA-M08)	December 16, 2013

/SIGNED

dacted for privacy purposes per 0.Reg 455/09
ertification may be redacted and replaced with an
the original was signed. 0. Reg. 295/18, s. 2 (2).

Brad Bergeron, Planner License #0242 Senior Project Manager / Toxic Substance Reduction Planner RWDI AIR Inc.



# FCA Canada Inc. Brampton Assembly Plant

TRA Plan Summary October 2016



## Public Reporting Under O. Reg. 455/09 Public Plan Summary

# FCA Canada Inc. Brampton Assembly Plant

October 26, 2016



### **ENVIRONMENTAL REPORTING:**

The National Pollution Release Inventory (NPRI) is Canada's legislated, publically accessible inventory of releases (to air, water and land), disposals and transfers for recycling that are associated with industrial activity. Over 84,000 facilities report to the NPRI on more than 300 listed substances. FCA Canada Inc. has been reporting in accordance with federal NPRI regulations since its inception in 1992.

Additionally, beginning in 2010, the Toxics Reduction Act requires certain facilities in Ontario to prepare and publish toxic substance reduction plans, though implementation of the plans is voluntary. The first report under the Toxic Reduction Act and Ontario Regulation 455/09 was required in June 2011.

Regulation 455 requires facilities to report on their use and creation of certain "substances of concern". Currently the list of substances of concern under the Toxics Reduction Act includes all of the substances on the NPRI list. Therefore, in addition to reporting releases, disposals and transfers of substances listed under NPRI, Ontario facilities must report on their use and creation of these substances along with the amount of the substance contained in each product.

Vehicles are made by all manufacturers in a similar manner globally. All vehicles sold in Canada must meet the same consumer performance expectations for the Canadian market as for export markets where they are sold. To meet these expectations, many of the substances listed in Ontario Regulation 455/09 as "substances of concern" are utilized in the manufacture of all vehicles, including those assembled elsewhere and imported to Ontario for sale.



### **BASIC FACILITY INFORMATION**

BASIC FACILITY INFORMATION					
Substances Included in the Plan					
<ul> <li>Hydrotreated Light Distillates (CAS No. 64742-47-8)</li> </ul>					
Facility Identification and Site Address					
Company Name FCA Canada Inc.		anada Inc.			
Facility Name	Brampton Assembly Plant				
	Physical Address:	Mailing Address:			
Facility Address	2000 Williams Parkway Brampton, ON L6S 6B3	Same as physical address			
Spatial Coordinates of Facility	UTM Northing 4837441, UTM Easting 599405 (NAD 1983)				
Number of Employees	3000				
NPRI ID	4173				
Primary North American Industrial Classification System Code (NAICS)					
2 Digit NAICS Code	31-33 (Manufacturing)				
4 Digit NAICS Code	3361 (Motor Vehicle Manufacturing)				
6 Digit NAICS Code	336110 (Automotive and Light Duty Motor Vehicle Manufacturing)				
Facilit	y and Planner Contact Informat	tion			
	Sue Forest	FCA Canada Inc.			
Facility Public Contact	Email:	3939 Rhodes Drive			
i acinty Fubile Contact	sue.forest@fcagroup.com Phone: (519) 973-2864	CIMS 242-01-03 Windsor, On N9A 4H6			



### **EXISTING ENVIRONMENTAL MANAGEMENT SYSTEMS**

FCA Canada Inc. is committed to the responsible management of all of its facilities and operations. This includes a proactive approach towards protecting public health and the natural environment through existing and planned environmental and sustainability initiatives. All Canadian operations have implemented comprehensive environmental management systems including Pollution Prevention commitments through World Class Manufacturing (WCM) and ISO 14001 certified Environmental Management Systems. Through these initiatives, each FCA facility intends to reduce or minimize its use and/or creation of each listed substance wherever possible. More specifically, the Brampton Assembly Plant (BAP) is dedicated to reducing its use and creation of toxic substances by continually striving for operational and process efficiency, innovation, and conservation.

In fact, FCA US LLC as a whole has adopted a global approach such that each facility has defined a standard process-based Environment Management System that identifies a process for continuous improvement, ongoing measurement of metrics tracked through scorecards and use of objective statements. The key to the success of the ISO 14001 is that metrics are reviewed by a third party accredited body to ensure that the Environment Management Systems strive for continuous improvement, meet or exceed regulatory standards and document all activities in accordance with the procedures outlined in the system.



As an example of the continuous improvement efforts that have been implemented within BAP, the following graph outlines the trends of total VOCs releases to air (in tonnes) per vehicle produced. The trend shows data from 2005 to 2012 and highlights that BAP has already reduced VOCs releases from peak historical periods by 50%.

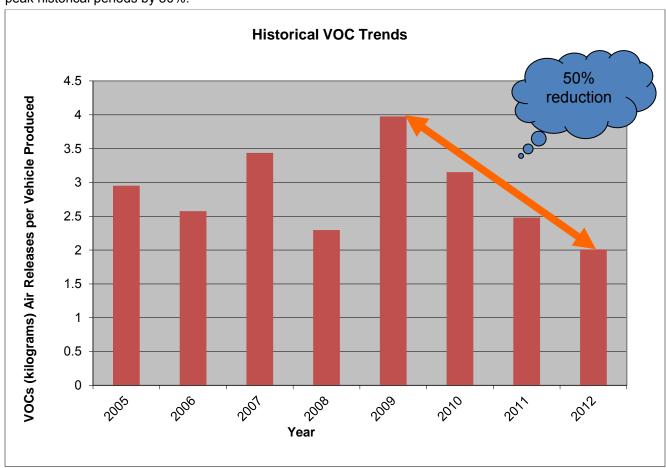


Figure 1: Historical VOC Air Release Trends



### PLAN SUMMARY FOR EACH SUBSTANCE

### **HYDROTREATED LIGHT DISTILLATES (CAS NO. 64742-47-8)**

#### **Statement of Intent**

In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Polices, BAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Hydrotreated Light Distillates through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Hydrotreated Light Distillates.

### **Description of Used of Substance**

Hydrotreated Light Distillates is a component of Cleaning solvents.

### Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Hydrotreated Light Distillates. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Brampton Assembly Plant for Hydrotreated Light Distillates, dated September 27, 2016.



### **Certification by Highest Ranking Employee**

As of October 26, 2016, I, Joseph Araujo, 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.

**Substance** 

Hydrotreated Light Distillates (CAS No. 64742-47-8)

Date of Certified Plan

October 26, 2016

/SIGNED

a signature recontred for privacy purposes per O.neg 43343 a signature in a certification may be redacted and replaced with a indication that the original was signed. O. Reg. 295/18, s. 2 (2).

Joseph Araujo Plant Manager FCA Canada Inc.

**Brampton Assembly Plant** 



### Certification by Licensed Planner

As of October 26, 2016, I, Brad Bergeron, certify that I am familiar with the processes at Brampton Assembly Plant 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 toxic substance reduction plans referred to below for the toxic substances and that the plans comply with the Act and Ontario Regulation 455/09 (General) made under that Act.

### Substance

Hydrotreated Light Distillates (CAS No. 64742-47-8)

Date of Certified Plan October 26, 2016

/SIGNED
signature redscited for privacy purposes per 0, Reg 455/09
a signature in a certification may be reducted and replaced with an
indication that the original was signed. 0, Reg. 295/18, s. 2 (2).

Brad Bergeron, Planner License #0242 Senior Project Manager / Toxic Substance Reduction Planner RWDI AIR Inc.