

FCA Canada Inc.  
Windsor Assembly Plant

TRA Plan Summary December 2012

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

Chrysler Canada Inc.  
Windsor Assembly Plant

December 13, 2012

## ENVIRONMENTAL REPORTING:

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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

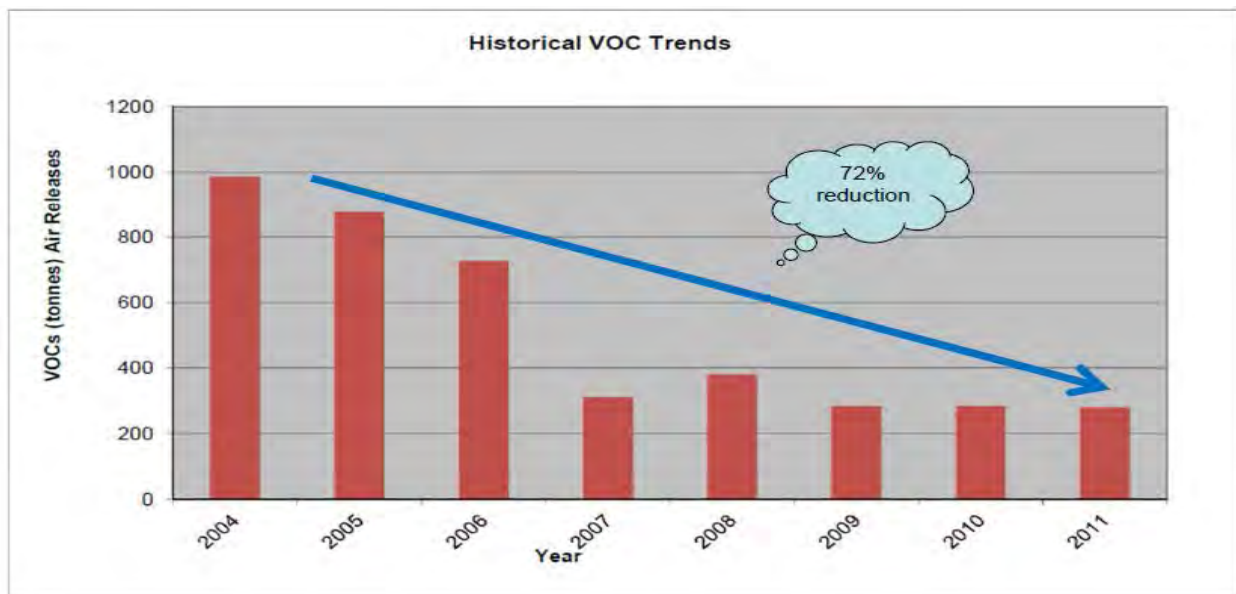
BASIC FACILITY INFORMATION		
<b>Substances Included in the Plan</b>		
<ul style="list-style-type: none"> <li>Sulphuric Acid (7446-60-6)</li> <li>Zinc (CAS No. 7440-66-6)</li> <li>Xylene (CAS No. 1330-20-7)</li> <li>Methanol (CAS No. 67-56-1)</li> <li>Ethylbenzene (CAS No. 100-41-4)</li> <li>Manganese (CAS No. 7439-96-5)</li> <li>Nickel (CAS No. 7440-02-2)</li> </ul>		
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Chrysler Canada Inc.	
<b>Facility Name</b>	Windsor Assembly Plant	
<b>Facility Address</b>	<b>Physical Address:</b>	<b>Mailing Address:</b>
	2199 Chrysler Centre Windsor, ON N8W 3Y6	P.O. Box 1621 Windsor, ON N9A 4H6
<b>Spatial Coordinates of Facility</b>	4685000, 336200 (NAD 1983)	
<b>Number of Employees</b>	5300	
<b>NPRI ID</b>	3476	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
<b>2 Digit NAICS Code</b>	31-33 (Manufacturing)	
<b>4 Digit NAICS Code</b>	3361 (Motor Vehicle Manufacturing)	
<b>6 Digit NAICS Code</b>	336110 (Automotive and Light Duty Motor Vehicle Manufacturing)	
<b>Facility and Planner Contact Information</b>		
<b>Facility Public Contact</b>	Sue Forest	Chrysler Canada Inc.
	Email: <a href="mailto:sf3@chrysler.com">sf3@chrysler.com</a>	3939 Rhodes Drive CIMS 242-01-03 Windsor, On N9A 4H6
	Phone: (519) 973-2864	

## 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 Windsor Assembly Plant (WAP) 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 at WAP, the following graph outlines the trends of total VOCs releases to air (in tonnes) (Figure 2). The trend shows data from 2004 to 2011 and highlights that WAP has already reduced VOCs releases from peak historical periods by 72%.



**Figure 2:** Historical VOC Air Release Trends

## PLAN SUMMARY FOR EACH SUBSTANCE

<b>SULPHURIC ACID (CAS NO. 7446-60-6)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
WAP does not intend to implement a reduction option for Sulphuric Acid. WAP 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.	
<b>Description of Use of Substance</b>	
Sulphuric Acid is used for pH control in the water treatment facility and cleaning of the phosphate system tanks.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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 Windsor Assembly Plant for Sulphuric Acid, dated December 13, 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 Policies, WAP intends to reduce or minimize the use of the listed substance wherever possible.

**Objectives**

Windsor Assembly Plant (WAP) does not intend to implement a reduction option for Zinc. WAP 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 Use 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, WAP 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. WAP 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 Windsor Assembly Plant for Zinc, dated December 13, 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Xylene. WAP 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 Use 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, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Xylene, dated December 13, 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Methanol. WAP 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 Use 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, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Methanol, dated December 13, 2012*

**ETHYL BENZENE (CAS NO. 100-41-4)****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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

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

**Description of Use of Substance**

Ethylbenzene is a component within coatings and adhesives

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

In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Ethylbenzene. WAP 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 Windsor Assembly Plant for Ethylbenzene, dated December 13, 2012*

<b>MANGANESE (CAS NO. 7439-96-5)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substance wherever possible.	
<b>Objectives</b>	
Windsor Assembly Plant (WAP) does not intend to implement a reduction option for Manganese. WAP 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 Manganese in the future.	
<b>Description of Use of Substance</b>	
Manganese is a component of the steel and welding material used to produce automobiles and also a component of phosphate treatment and sealers.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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 Windsor Assembly Plant for Manganese, dated December 13, 2012*

**NICKEL (CAS NO. 7440-02-2)****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 Policies, WAP intends to reduce or minimize the use of the listed substance wherever possible.

**Objectives**

Windsor Assembly Plant (WAP) does not intend to implement a reduction option for Nickel. WAP 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 Nickel in the future.

**Description of Use of Substance**

Nickel is a component of the steel and welding material used to produce automobiles and also a component of phosphate treatment and sealers.

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

In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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 Windsor Assembly Plant for Nickel, dated December 13, 2012*



### Certification by Highest Ranking Employee

As of December 13, 2012, I, Dan Omahen, certify that I have read the toxic substances referred to below and am familiar with their content are factually accurate and comply with the *Toxics Reduction Act, 2001* (General) made under that Act.

#### Substance

- Sulphuric Acid (CAS No. 7440-60-6) .....
- Xylene (CAS 1330-20-7) .....
- Methanol (CAS 67-56-1) .....
- Zinc (CAS 7440-66-6) .....
- Ethylbenzene (CAS No. 100-41-4) .....
- Manganese (CAS 7439-96-5) .....
- Nickel (CAS 7440-02-0) .....

**/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).

Dan Omahen  
Plant Manager  
Chrysler Canada Inc.  
Windsor Assembly Plant

### Certification by Licensed Planner

As of December 10, 2012, I, Mark Vanderheyden, certify that I am familiar with the processes at Windsor 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 13, 2012
• Xylene (CAS 1330-20-7) .....	December 13, 2012
• Methanol (CAS 67-56-1) .....	December 13, 2012
• Zinc (CAS 7440-66-6) .....	December 13, 2012
• Ethylbenzene (CAS No. 100-41-4) .....	December 13, 2012
• Manganese (CAS 7439-96-5) .....	December 13, 2012
• Nickel (CAS 7440-02-0) .....	December 13, 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).

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

FCA Canada Inc.  
Windsor Assembly Plant

TRA Plan Summary December 2013

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

Chrysler Canada Inc.  
Windsor Assembly Plant

December 16, 2013

## ENVIRONMENTAL REPORTING:

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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.

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## BASIC FACILITY INFORMATION

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<b>Substances Included in the Plan</b>		
• Methyl Isobutyl Ketone (CAS No. 108-10-1)	• Methylenebis(Phenyl)Isocyanate (CAS No. 101-68-8)	
• 2-Butoxyethanol (CAS No. 111-76-2)	• Ethylene Glycol (CAS No. 107-21-1)	
• N-Butyl Acetate (CAS No. 123-86-4)	• Sodium Nitrite (CAS No. 7632-00-0)	
• Heavy Alkylate Naphtha (CAS No. 64741-65-7)	• Nitric Acid (CAS No. 7697-37-2)	
• Hydrotreated Heavy Naphtha (CAS No. 64742-48-9)	• Nitrate Ion in Solution at pH>=6.0 (CAS No. NA-17)	
• Solvent Naphtha Light Aliphatic (CAS No. 64742-89-8)	• Total Phosphorus (CAS No. NA-22)	
• Light Aromatic Solvent Naphtha (CAS No. 64742-95-6)	• Acetone (CAS No. 67-64-1)	
• Isopropyl Alcohol (CAS No. 67-63-0)	• Carbon Monoxide (CAS No. 630-08-0)	
• Methyl Ethyl Ketone (CAS No. 79-93-3)	• Nitrogen Oxides (expressed as NO <sub>2</sub> ) (CAS No. 11104-93-1)	
• 1,2,4-Trimethylbenzene (CAS No. 95-63-6)	• PM <sub>10</sub> – Particulate Matter <= 10 Microns (CAS No. NA-M09)	
• N-Butyl Alcohol (CAS No. 71-36-3)	• PM <sub>2.5</sub> – Particulate Matter <= 2.5 Microns (CAS No. NA-M10)	
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Chrysler Canada Inc.	
<b>Facility Name</b>	Windsor Assembly Plant	
<b>Facility Address</b>	<b>Physical Address:</b>	<b>Mailing Address:</b>
	2199 Chrysler Centre Windsor, ON N8W 3Y6	P.O. Box 1621 Windsor, ON N9A 4H6
<b>Spatial Coordinates of Facility</b>	4685000, 336200 (NAD 1983)	
<b>Number of Employees</b>	4500	
<b>NPRI ID</b>	3476	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
<b>2 Digit NAICS Code</b>	31-33 (Manufacturing)	
<b>4 Digit NAICS Code</b>	3361 (Motor Vehicle Manufacturing)	
<b>6 Digit NAICS Code</b>	336110 (Automotive and Light Duty Motor Vehicle Manufacturing)	
<b>Facility and Planner Contact Information</b>		
<b>Facility Public Contact</b>	Sue Forest	Chrysler Canada Inc.
	Email: <a href="mailto:sf3@chrysler.com">sf3@chrysler.com</a>	3939 Rhodes Drive CIMS 242-01-03 Windsor, On N9A 4H6
	Phone: (519) 973-2864	

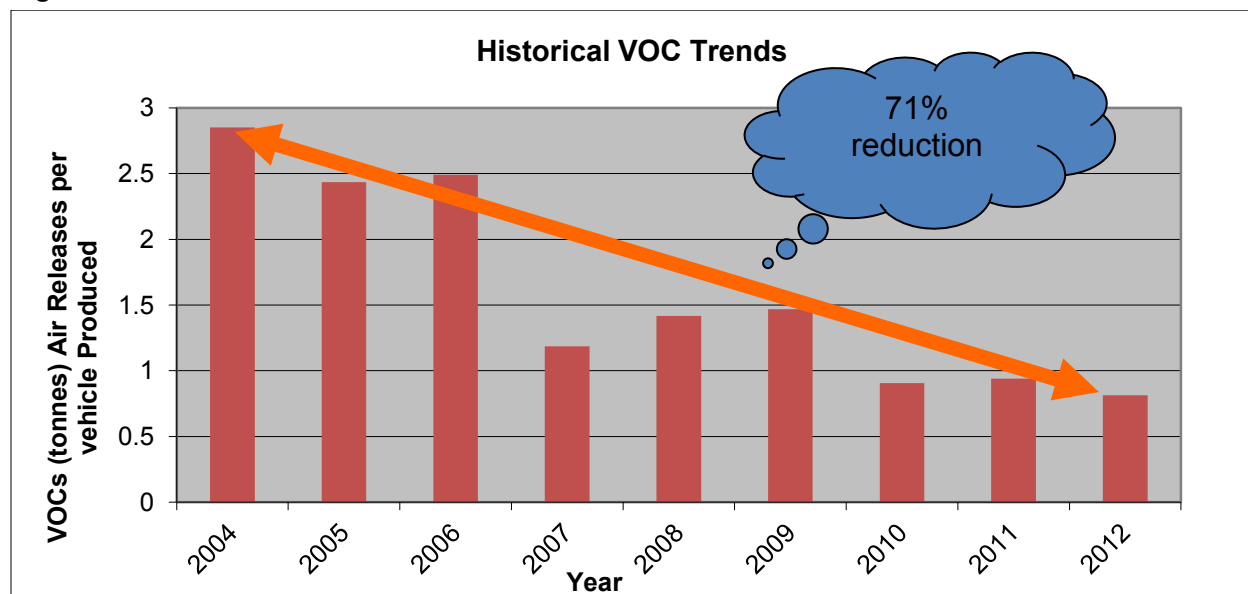
## EXISTING ENVIRONMENTAL MANAGEMENT SYSTEMS

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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.

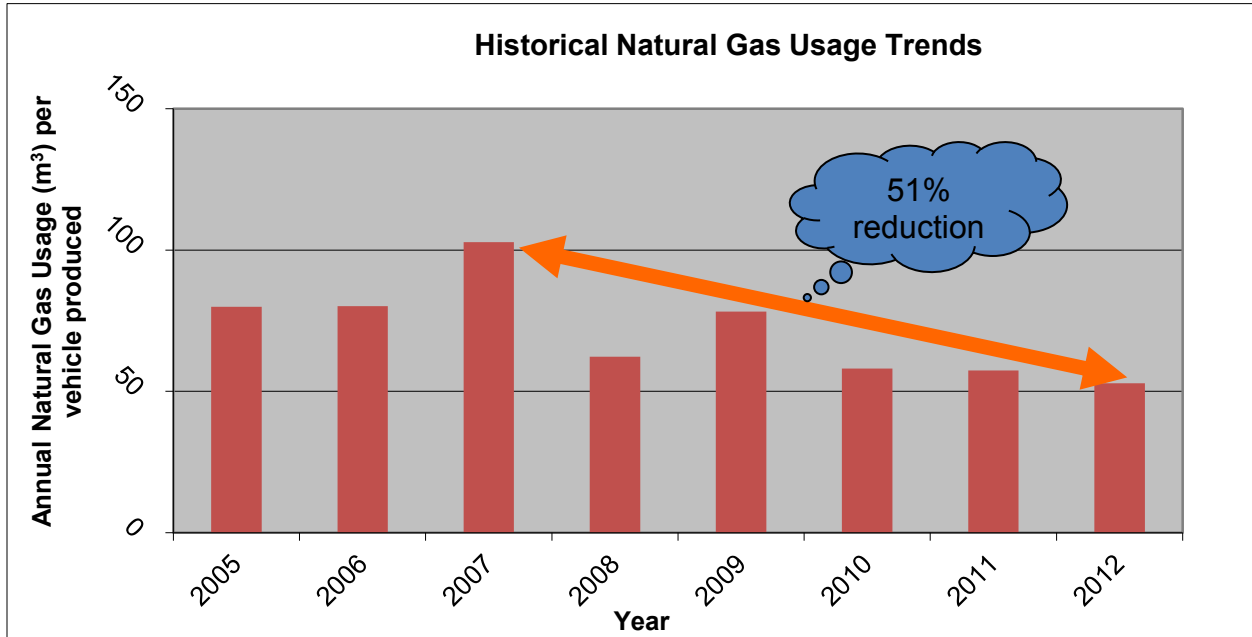
As an example of the continuous improvement efforts that have been implemented at WAP, the following graph outlines the trends of total VOCs releases to air (in tonnes) per vehicle produced (Figure 1). The trend shows data from 2004 to 2012 and highlights that WAP has already reduced VOCs releases per vehicle produced from peak historical periods by 71%.

**Figure 1: Historical VOC Air Release Trends**



As another example of the continuous improvement efforts that have been implemented within WAP, the following graph outlines the trends of total Natural Gas usage in cubic metres (related to creation of CACs and CAC releases to air) per vehicle produced. The trend shows data from 2005 to 2012 and highlights that WAP has already reduced natural gas usage from peak historical periods by 51%.

**Figure 2:** Historical Natural Gas Usage Trends per Vehicle Produced



## PLAN SUMMARY FOR EACH SUBSTANCE

<b>METHYL ISOBUTYL KETONE (CAS NO. 108-10-1)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Methyl Isobutyl Ketone through the Toxic Reduction Act and Regulation. WAP 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.	
<b>Description of Use of Substance</b>	
Methyl Isobutyl Ketone is a component of coatings and purge solvent used for the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Methyl Isobutyl Ketone, 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

### Objectives

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to 2-Butoxyethanol through the Toxic Reduction Act and Regulation. WAP 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 Use of Substance

2-Butoxyethanol 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, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for 2-Butoxyethanol, dated December 16, 2013.*

<b>N-BUTYL ACETATE (CAS NO. 123-86-4)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to N-Butyl Acetate through the Toxic Reduction Act and Regulation. WAP 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.	
<b>Description of Use of Substance</b>	
N-Butyl Acetate is a component of coatings, purge solvent and window primers used for the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for N-Butyl Acetate, dated December 16, 2013.*

## HEAVY ALKYLATE NAPHTHA (CAS NO. 64741-65-7)

### 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

### Objectives

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

### Description of Use of Substance

Heavy Alkylate 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, WAP 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. WAP 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 Alkylate Naphtha. WAP 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 Windsor Assembly Plant for Heavy Alkylate Naphtha, 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Hydrotreated Heavy Naphtha through the Toxic Reduction Act and Regulation. WAP 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 Use of Substance**

Hydrotreated Heavy Naphtha is a component of sealers and machine maintenance 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, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Hydrotreated Heavy Naphtha, 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Solvent Naphtha Light Aliphatic through the Toxic Reduction Act and Regulation. WAP 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 Use of Substance**

Solvent Naphtha Light Aliphatic is a component of phosphate, coatings, window primers 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, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Solvent Naphtha Light Aliphatic, 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Light Aromatic Solvent Naphtha through the Toxic Reduction Regulation and Act. WAP 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 Use of Substance**

Light Aromatic Solvent Naphtha is a component of coatings and purge 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, WAP 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 Regulation and Act. WAP 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. WAP 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 Windsor 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

### Objectives

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Isopropyl Alcohol through the Toxic Reduction Act and Regulation. WAP 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 Use of Substance

Isopropyl Alcohol is a component of vehicles wipes, adhesives, cleaning products 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, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Isopropyl Alcohol, dated December 16, 2013.*

## **METHYL ETHYL KETONE (CAS NO. 79-93-3)**

### **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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

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

### **Description of Use of Substance**

Methyl Ethyl Ketone is a component of purge solution and window primers 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, WAP 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. WAP 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 Ethyl Ketone. WAP 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 Windsor Assembly Plant for Methyl Ethyl Ketone, 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

### **Objectives**

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to 1,2,4-Trimethylbenzene through the Toxic Reduction Act and Regulation. WAP 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 Use of Substance**

1,2,4-Trimethylbenzene is a component of coatings and purge solvents 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, WAP 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. WAP 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. WAP 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 Windsor 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to N-Butyl Alcohol through the Toxic Reduction Act and Regulation. WAP 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 Use of Substance**

N-Butyl Alcohol is a component of coatings and purge solvents 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, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for N-Butyl 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Methylenebis(Phenyl)Isocyanate through the Toxic Reduction Act and Regulation. WAP 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 Use of Substance**

Methylenebis(Phenyl)Isocyanate is a component of foam and window adhesive 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, WAP 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. WAP 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. WAP 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 Windsor 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Ethylene Glycol through the Toxic Reduction Act and Regulation. WAP 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 Use of Substance**

Ethylene Glycol is a component of anti-freeze added to the vehicles as well as machine maintenance 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, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Ethylene Glycol, 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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

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

**Description of Use of Substance**

Sodium Nitrite is a component of phosphate treatment, component of anti-freeze and wastewater treatment 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, WAP 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. WAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOCs, Energy, Water, etc., which may result in reduction in the use or discharge of Sodium Nitrite. WAP 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 Windsor Assembly Plant for Sodium Nitrite, dated December 16, 2013.*

<b>NITRIC ACID (CAS NO. 7697-37-2)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Nitric Acid through the Toxic Reduction Act and Regulation. WAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOCs, Energy, Water, etc., which may result in reduction in use or discharge of Nitric Acid.	
<b>Description of Use of Substance</b>	
Nitric Acid is a component of phosphate treatment used in the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOCs, Energy, Water, etc., which may result in reduction in the use or discharge of Nitric Acid. WAP 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 Windsor Assembly Plant for Nitric Acid, dated December 16, 2013.*

<b>NITRATE ION IN SOLUTION AT PH&gt;=6.0 (CAS NO. NA-17)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Nitrate Ion in Solution at pH>=6.0 through the Toxic Reduction Act and Regulation. WAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOCs, Energy, Water, etc., which may result in reduction in use or discharge of Nitrate Ion in Solution at pH>=6.0.	
<b>Description of Use of Substance</b>	
Nitrate Ion in Solution at pH>=6.0 is a component of phosphate treatment and water treatment products used for the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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 WAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOCs, Energy, Water, etc., which may result in reduction in the use or discharge of Nitrate Ion in Solution at pH>=6.0. WAP 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 Windsor Assembly Plant for Nitrate Ion in Solution at pH>=6.0, dated December 16, 2013.*

<b>TOTAL PHOSPHORUS (CAS NO. NA-22)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Total Phosphorus through the Toxic Reduction Act and Regulation. WAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOCs, Energy, Water, etc., which may result in reduction in use or discharge of Total Phosphorus.	
<b>Description of Use of Substance</b>	
Total Phosphorus is a component of cleaning products and phosphate treatment used for the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP has chosen to set objectives and targets for overall Key Process Indicators (KPIs) such as VOCs, Energy, Water, etc., which may result in reduction in the use or discharge of Total Phosphorus. WAP 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 Windsor Assembly Plant for Total Phosphorus, dated December 16, 2013.*

**ACETONE (CAS NO. 67-64-1)****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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.

**Objectives**

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

**Description of Use of Substance**

Acetone 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, WAP 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. WAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Acetone. WAP 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 Windsor Assembly Plant for Acetone, dated December 16, 2013.*

<b>CARBON MONOXIDE (CAS NO. 630-08-0)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the creation of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Carbon Monoxide through the Toxic Reduction Act and Regulation. WAP has chosen to set objectives and targets for energy reduction, which may result in reduction in use or discharge of Carbon Monoxide.	
<b>Description of Use of Substance</b>	
Carbon Monoxide is created from natural gas combustion.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Carbon Monoxide, dated December 16, 2013.*

<b>NITROGEN OXIDES (EXPRESSED AS NO<sub>2</sub>) (CAS NO. 11104-93-1)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the creation of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Nitrogen Oxides through the Toxic Reduction Act and Regulation. WAP has chosen to set objectives and targets for energy reduction, which may result in reduction in use or discharge of Nitrogen Oxides.	
<b>Description of Use of Substance</b>	
Nitrogen Oxides is created from the combustion of natural gas.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Nitrogen Oxides, dated December 16, 2013.*

<b>PM<sub>10</sub> – PARTICULATE MATTER ≤ 10 MICRONS (CAS NO. NA-M09)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the creation of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to PM <sub>10</sub> – Particulate Matter through the Toxic Reduction Act and Regulation. WAP has chosen to set objectives and targets for total CAC as a class, which may result in reduction in use or discharge of PM <sub>10</sub> – Particulate Matter.	
<b>Description of Use of Substance</b>	
PM <sub>10</sub> – Particulate Matter is created through the combustion of natural gas, sanding, grinding and welding and through the application of the coatings.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP has chosen to set objectives and targets for total Energy Conservation as a class, which may result in reduction in the use or discharge of PM <sub>10</sub> – Particulate Matter. WAP 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 Windsor Assembly Plant for PM<sub>10</sub> – Particulate Matter ≤ 10 Microns, dated December 16, 2013.*

<b>PM<sub>2.5</sub> – PARTICULATE MATTER &lt;= 2.5 MICRONS (CAS NO. NA-M10)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the creation of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to PM <sub>2.5</sub> – Particulate Matter through the Toxic Reduction Act and Regulation. WAP has chosen to set objectives and targets for total CACs as a class, which may result in reduction in use or discharge of PM <sub>2.5</sub> – Particulate Matter.	
<b>Description of Use of Substance</b>	
PM <sub>2.5</sub> – Particulate Matter is a created through the combustion of natural gas, sanding, grinding and welding and through the application of the coatings.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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>2.5</sub> – Particulate Matter. WAP 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 Windsor Assembly Plant for PM<sub>2.5</sub> – Particulate Matter <= 2.5 Microns, dated December 16, 2013.*

### Certification by Highest Ranking Employee

As of December 16, 2013, I, Dan Omahen, 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
▪ 2-Butoxyethanol (CAS No. 111-76-2)	December 16, 2013
▪ N-Butyl Acetate (CAS No. 123-86-4)	December 16, 2013
▪ Heavy Alkylate Naphtha (CAS No. 64741-65-7)	December 16, 2013
▪ Hydrotreated Heavy Naphtha (CAS No. 64742-48-9)	December 16, 2013
▪ Solvent Naphtha Light Aliphatic (CAS No. 64742-89-8)	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
▪ Methyl Ethyl Ketone (CAS No. 79-93-3)	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
▪ Methylenebis(Phenyl)Isocyanate (CAS No. 101-68-8)	December 16, 2013
▪ Ethylene Glycol (CAS No. 107-21-1)	December 16, 2013
▪ Sodium Nitrite (CAS No. 7632-00-0)	December 16, 2013
▪ Nitric Acid (CAS No. 7697-37-2)	December 16, 2013
▪ Nitrate Ion in Solution at pH>=6.0 (CAS No. NA-17)	December 16, 2013
▪ Total Phosphorus (CAS No. NA-22)	December 16, 2013
▪ Acetone (CAS No. 67-64-1)	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

**/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).

Dan Omahen  
Plant Manager  
Chrysler Canada Inc.  
Windsor Assembly Plant

## Certification by Licensed Planner

As of December 16, 2013, I, Brad Bergeron, certify that I am familiar with the processes at Windsor 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.

<u>Substance</u>	<u>Date of Certified Plan</u>
▪ Methyl Isobutyl Ketone (CAS No. 108-10-1)	December 16, 2013
▪ 2-Butoxyethanol (CAS No. 111-76-2)	December 16, 2013
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**/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).

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

FCA Canada Inc.  
Windsor Assembly Plant

TRA Plan Summary December 2015

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

FCA Canada Inc.  
Windsor Assembly Plant

December 17, 2015

## ENVIRONMENTAL REPORTING:

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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		
<b>Substances Included in the Plan</b>		
<ul style="list-style-type: none"> <li>Solvent Naphtha Medium Aliphatic (CAS No. 64742-88-7)</li> <li>Hydrotreated Light Distillate (CAS No. 64742-47-8)</li> </ul>		
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	FCA Canada Inc.	
<b>Facility Name</b>	Windsor Assembly Plant	
<b>Facility Address</b>	<b>Physical Address:</b>	<b>Mailing Address:</b>
	2199 Chrysler Centre Windsor, ON N8W 3Y6	P.O. Box 1621 Windsor, ON N9A 4H6
<b>Spatial Coordinates of Facility</b>	4685000, 336200 (NAD 1983)	
<b>Number of Employees</b>	4500	
<b>NPRI ID</b>	3476	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
<b>2 Digit NAICS Code</b>	31-33 (Manufacturing)	
<b>4 Digit NAICS Code</b>	3361 (Motor Vehicle Manufacturing)	
<b>6 Digit NAICS Code</b>	336110 (Automotive and Light Duty Motor Vehicle Manufacturing)	
<b>Facility and Planner Contact Information</b>		
<b>Facility Public Contact</b>	Sue Forest	FCA Canada Inc.
	Email: <a href="mailto:sue.forest@fcagroup.com">sue.forest@fcagroup.com</a>	3939 Rhodes Drive CIMS 242-01-03 Windsor, On N9A 4H6
	Phone: (519) 973-2864	

## **EXISTING ENVIRONMENTAL MANAGEMENT SYSTEMS**

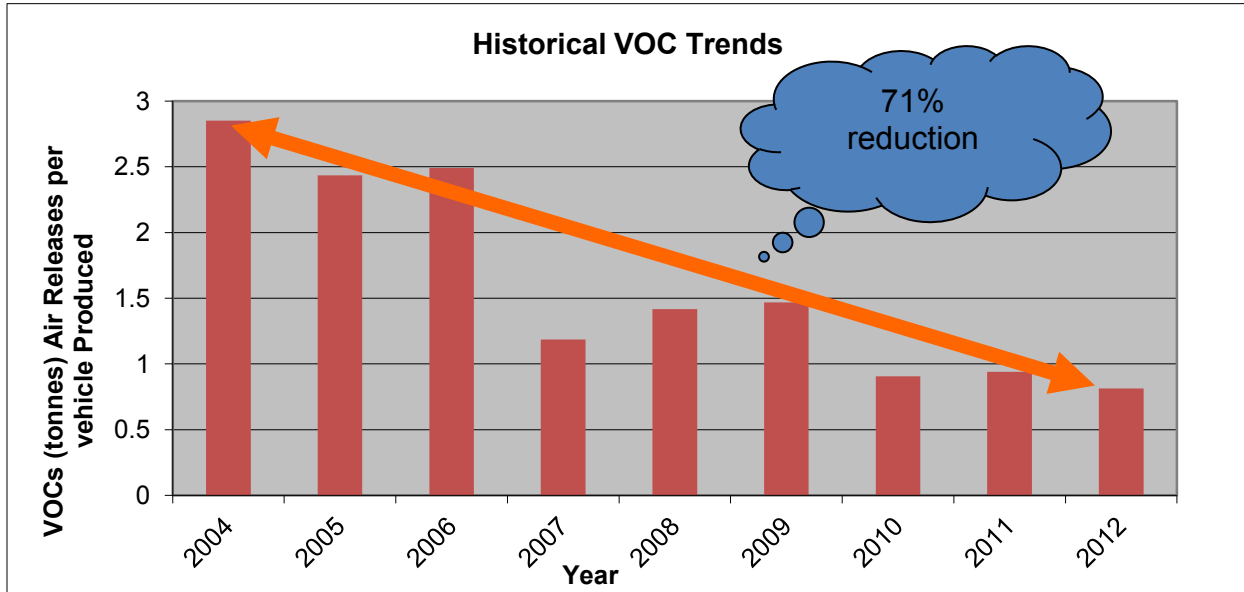
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FCA Canada Inc. is committed to the responsible management of all of its facilities and operations. This includes a proactive approach towards protecting public health and the natural environment through existing and planned environmental and sustainability 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 Windsor Assembly Plant (WAP) 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.

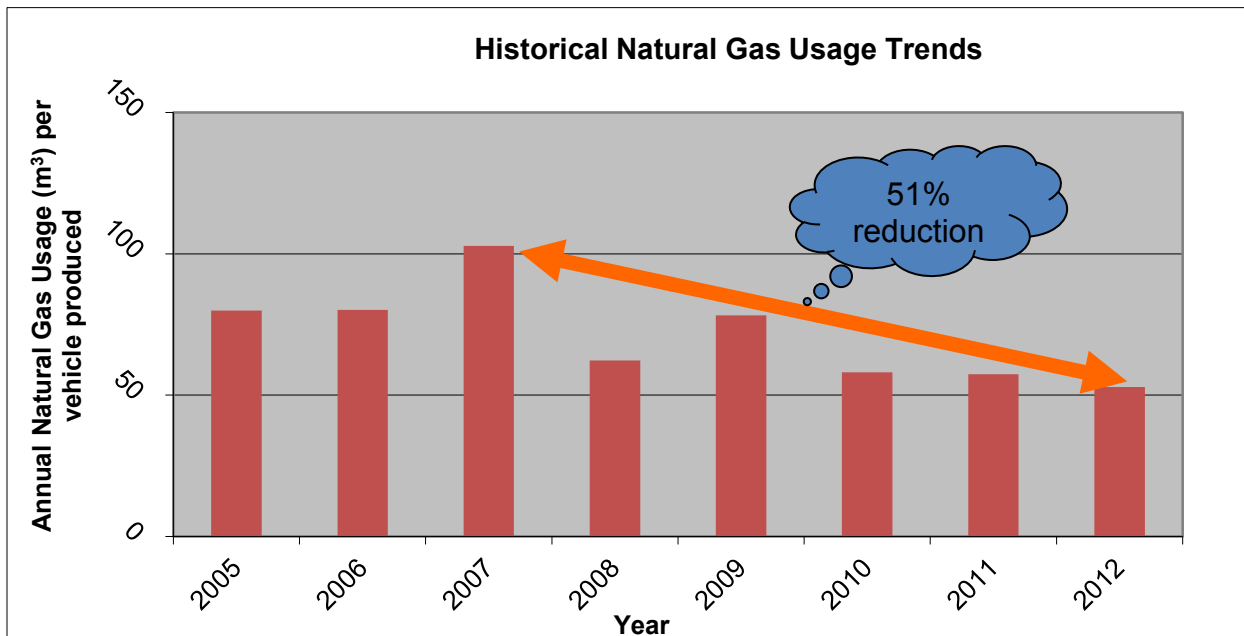
As an example of the continuous improvement efforts that have been implemented at WAP, the following graph outlines the trends of total VOCs releases to air (in tonnes) per vehicle produced (Figure 1). The trend shows data from 2004 to 2012 and highlights that WAP has already reduced VOCs releases per vehicle produced from peak historical periods by 71%.

**Figure 1: Historical VOC Air Release Trends**



As another example of the continuous improvement efforts that have been implemented within WAP, the following graph outlines the trends of total Natural Gas usage in cubic metres (related to creation of CACs and CAC releases to air) per vehicle produced. The trend shows data from 2005 to 2012 and highlights that WAP has already reduced natural gas usage from peak historical periods by 51%.

**Figure 2: Historical Natural Gas Usage Trends per Vehicle Produced**



## PLAN SUMMARY FOR EACH SUBSTANCE

<b>SOLVENT NAPHTHA MEDIUM ALIPHATIC (CAS NO. 64742-88-7)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Solvent Naphtha Medium Aliphatic through the Toxic Reduction Act and Regulation. WAP 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.	
<b>Description of Use of Substance</b>	
Solvent Naphtha Medium Aliphatic is a component of solvent used for the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Solvent Naphtha Medium Aliphatic, dated December 17, 2015.*

<b>HYDROTREATED LIGHT DISTILLATE (CAS NO. 64742-47-8)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Hydrotreated Light Distillate through the Toxic Reduction Act and Regulation. WAP 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 Distillate.	
<b>Description of Use of Substance</b>	
Hydrotreated Light Distillate is a component of solvent used for the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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 Distillate. WAP 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 Windsor Assembly Plant for Hydrotreated Light Distillate, dated December 17, 2015.*



FIAT CHRYSLER AUTOMOBILES

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

As of December 17, 2015, I, Michael Brieda, 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

- Solvent Naphtha Medium Aliphatic (CAS No. 64742-88-7)
- Hydrotreated Light Distillate (CAS No. 64742-47-8)

#### Date of Certified Plan

December 17, 2015

December 17, 2015



Michael Brieda  
Plant Manager  
FCA Canada Inc.  
Windsor Assembly Plant

### **Certification by Licensed Planner**

As of December 17, 2015, I, Brad Bergeron, certify that I am familiar with the processes at Windsor 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

- Solvent Naphtha Medium Aliphatic (CAS No. 64742-88-7)
- Hydrotreated Light Distillate (CAS No. 64742-47-8)

#### Date of Certified Plan

December 17, 2015

December 17, 2015



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

FCA Canada Inc.  
Windsor Assembly Plant

TRA Plan Summary August 2016

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

FCA Canada Inc.  
Windsor Assembly Plant

August 8, 2016

## ENVIRONMENTAL REPORTING:

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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		
<b>Substances Included in the Plan</b>		
<ul style="list-style-type: none"> <li>Isobutyl Alcohol (CAS No. 78-83-1)</li> </ul>		
<b>Facility Identification and Site Address</b>		
Company Name	FCA Canada Inc.	
Facility Name	Windsor Assembly Plant	
Facility Address	<b>Physical Address:</b>	<b>Mailing Address:</b>
	2199 Chrysler Centre Windsor, ON N8W 3Y6	P.O. Box 1621 Windsor, ON N9A 4H6
Spatial Coordinates of Facility	4685000, 336200 (NAD 1983)	
Number of Employees	4500	
NPRI ID	3476	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
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)	
<b>Facility and Planner Contact Information</b>		
Facility Public Contact	Sue Forest	FCA Canada Inc.
	Email: <a href="mailto:sue.forest@fcagroup.com">sue.forest@fcagroup.com</a>	3939 Rhodes Drive CIMS 242-01-03 Windsor, On N9A 4H6
	Phone: (519) 973-2864	

## **EXISTING ENVIRONMENTAL MANAGEMENT SYSTEMS**

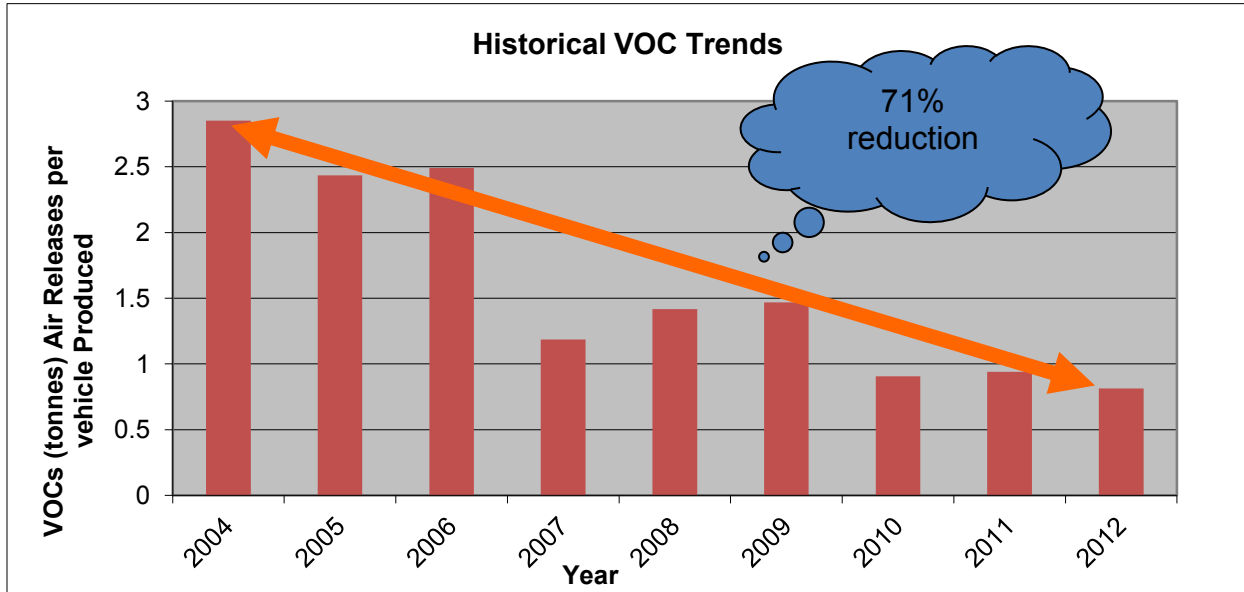
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FCA Canada Inc. is committed to the responsible management of all of its facilities and operations. This includes a proactive approach towards protecting public health and the natural environment through existing and planned environmental and sustainability 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 Windsor Assembly Plant (WAP) 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.

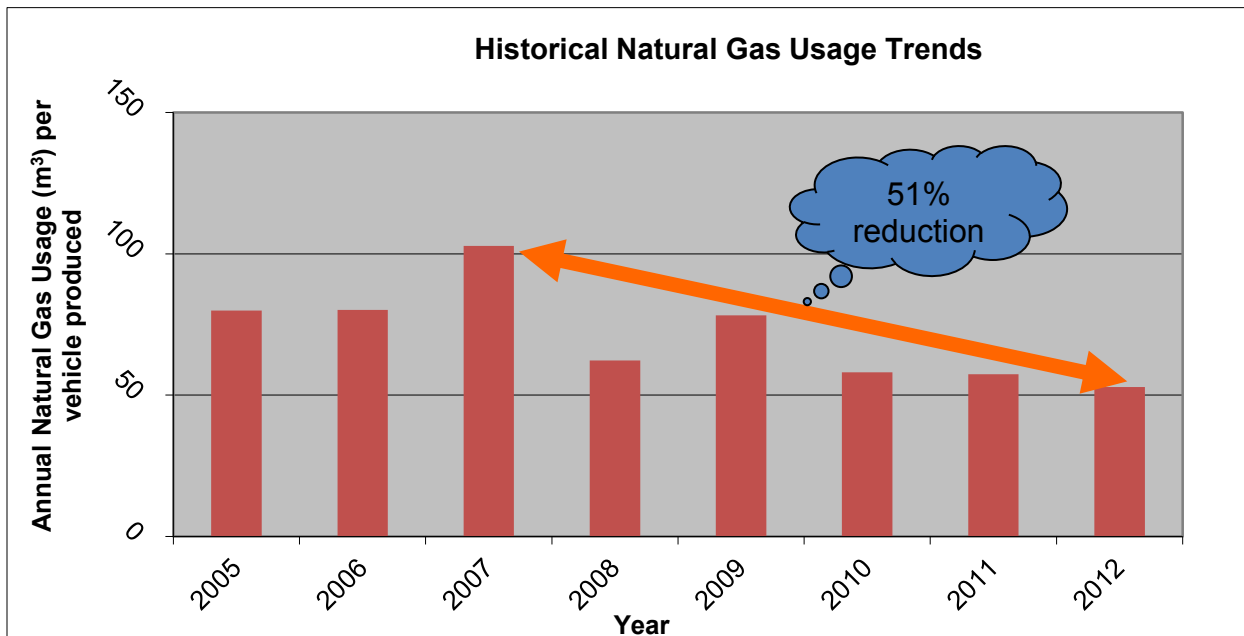
As an example of the continuous improvement efforts that have been implemented at WAP, the following graph outlines the trends of total VOCs releases to air (in tonnes) per vehicle produced (Figure 1). The trend shows data from 2004 to 2012 and highlights that WAP has already reduced VOCs releases per vehicle produced from peak historical periods by 71%.

**Figure 1: Historical VOC Air Release Trends**



As another example of the continuous improvement efforts that have been implemented within WAP, the following graph outlines the trends of total Natural Gas usage in cubic metres (related to creation of CACs and CAC releases to air) per vehicle produced. The trend shows data from 2005 to 2012 and highlights that WAP has already reduced natural gas usage from peak historical periods by 51%.

**Figure 2: Historical Natural Gas Usage Trends per Vehicle Produced**



## PLAN SUMMARY FOR EACH SUBSTANCE

<b>ISOBUTYL ALCOHOL (CAS NO. 78-83-1)</b>	
<b>Statement of Intent</b>	
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 Policies, WAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Windsor Assembly Plant (WAP) is not planning to implement a reduction plan specific to Isobutyl Alcohol (CAS# 78-83-1) through the Toxic Reduction Act and Regulation. WAP 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.	
<b>Description of Use of Substance</b>	
Isobutyl Alcohol is a component of solvent used for the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, WAP 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. WAP 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. WAP 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 Windsor Assembly Plant for Isobutyl Alcohol, dated August 8, 2016.*

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

As of August 8, 2016 I, Michael Brieda, 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

- Isobutyl Alcohol (CAS# 78-83-1)

Date of Certified Plan

August 8, 2016



Michael Brieda  
Plant Manager  
FCA Canada Inc.  
Windsor Assembly Plant

### **Certification by Licensed Planner**

As of August 8, 2016, I, Brad Bergeron, certify that I am familiar with the processes at Windsor 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

- Isobutyl Alcohol (CAS# 78-83-1)

Date of Certified Plan

August 8, 2016



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