

ONTARIO TOXICS REDUCTION ACT
Plan Summary - 2017

COMPANY DATA:

Parent Company: 100% ownership

Flash Lux Co S.à r.l.

2 avenue Charles de Gaulle Avenue,

Luxembourg

L21653

LUXEMBOURG

Reporting Facility:

Axalta Coating Systems Canada Company

1915 Second Street West

Cornwall, Ontario

K6H 5T1

National Pollutant Release Inventory Identification Number	1353
Provincial Identifier	6899
Primary Industrial Classification (North American Industrial Classification System, NAICS) code 2 digit NAICS code 4 digit NAICS code 6 digit NAICS code	32 - Manufacturing 3255 - Paint, Coating and Adhesive Manufacturing 325510 - Paint and Coating Manufacturing
Geographical Co-ordinates (Datum 1983)	Latitude: 45.0117 Longitude: -74.7773 UTM Easting 517548 UTM Northing 4984274
Technical contact person	Mike Livermore HSE Consultant (613) 932-5192
Number of Full-time employees	77

List of NPRI reportable substances in use at the Cornwall facility

NAME	CAS Number	Regulatory Reporting
ACETONE	67-64-1	O. Reg. 127/01 Table 2B Substance
METHANOL	67-56-1	NPRI Part 1 Substance
ISOBUTYL ALCOHOL	78-83-1	NPRI Part 1 Substance
TOLUENE	108-88-3	NPRI Part 1 Substance
XYLENE	1330-20-7	NPRI Part 1 Substance
ETHYLBENZENE	100-41-4	NPRI Part 1 Substance
2-BUTOXYETHANOL	111-76-2	NPRI Part 1 Substance
METHYL ETHYL KETONE	78-93-3	NPRI Part 1 Substance
METHYL ISOBUTYL KETONE	108-10-1	NPRI Part 1 Substance
PM10 - PARTICULATE MATTER	N/A	NPRI Part 4 Substance
PM2.5 - PARTICULATE MATTER	N/A	NPRI Part 4 Substance
VOLATILE ORGANIC COMPOUNDS (VOC)	N/A	NPRI Part 4 Substance
n-BUTYL ACETATE	123-86-4	NPRI Part 5 Substance
ETHYL ACETATE	141-78-6	NPRI Part 5 Substance
ETHANOL	64-17-5	NPRI Part 5 Substance
ISOPROPYL ALCOHOL	67-63-0	NPRI Part 5 Substance

STATEMENT OF INTENT

Axalta Coating Systems Canada Company is committed to playing a leadership role in protecting the environment. Whenever feasible, we will eliminate, or reduce the use, creation and discharge of the seven toxic substances listed above, in full compliance with all federal and provincial regulations. Toxic use reduction will be an ongoing effort for Axalta Coating Systems Canada Company, and we will continue to monitor technological advancements to ensure that reduction options that are both technological and financially viable are implemented at our facility.

REDUCTION OBJECTIVES

Where technically and economically feasible, our goal is to reduce the overall use of the sixteen toxic substances at the facility. Reduction activities will be implemented and achieved as outlined in the timetable found in the toxic substance reduction plan. We will achieve these reductions via three implementation strategies. The primary activity will involve the development of a range of water-based coatings that will replace the equivalent solvent-based coatings. The success of this strategy will require customer acceptance of these coatings for both quality and cost. This strategy has been implemented and is on-going. The second activity involves the replacement of methanol with ethanol in non-grain raising stains. Both solvents are listed on the NPRI and the primary reason for the change is based on safety concerns. However, it is anticipated that this change will result in a drop in overall usage. During this phase, water-based non-grain raising stains are being developed and will eventually replace the alcohol-based stains pending customer acceptance. The third strategy will involve the replacement of methyl ethyl ketone with acetone. This activity is on-going in the development of lower VOC content coatings to meet various regulatory requirements (acetone is a VOC exempt solvent in most North American jurisdictions). The side benefit of this strategy will be to reduce the overall use of NPRI reportable solvents and reduce reportable emissions.

DESCRIPTION OF SUBSTANCES

Acetone, methanol, isobutanol, toluene, xylene (all isomers), ethylbenzene, 2-butoxyethanol, methyl ethyl ketone, methyl isobutyl ketone, n-butyl acetate, ethyl acetate, ethanol and isopropyl alcohol are all used in the manufacture of solvent-based and water-based coatings. The primary market for these coatings is the wood furniture, kitchen cabinet and flooring industries. Methyl ethyl ketone is also used in the equipment cleaning process.

TOXIC SUBSTANCE REDUCTION OPTIONS TO BE IMPLEMENTED

Methyl Isobutyl Ketone (108-10-1)

There are no viable alternatives to MIBK as a component in solvent-based wood coatings systems. Any reduction in the use of solvent-based wood coatings system will be based on customer acceptance of water-based coatings for both quality and cost. Any reductions in the use of methyl isobutyl ketone will be as a consequence of a reduction in the manufacture of solvent-based coatings. No specific plan for methyl isobutyl ketone has been implemented.

Toluene (108-88-3)

- (1) The usage of toluene will be reduced in solvent-based paints primarily through formulating new products with lower or no toluene.
- (2) Replacement of some of these solvent-based paints with water-based alternatives.

	Used (tonnes/yr)	Created (tonnes/yr)	C.I.P. (tonnes/yr)	On site releases (tonnes/yr)			Disposal/recycle (tonnes/yr)	
				Air	Water	Land	On-site	Off-site
Baseline	100 - 1000	0	100 - 1000	4.5	0	0	0	2.8
Estimated reduced total	100 - 1000	0	100 - 1000	4.3	0	0	0	2.8
Reduction	10 - 100	0	10 - 100	0.2	0	0	0	0

2-Butoxyethanol (111-76-2)

2-butoxyethanol is an excellent co-solvent for water-based wood coatings for industrial customers and its usage may increase as the water-based coatings replace solvent-based wood coatings. No specific plan for 2-butoxyethanol has been implemented.

n-Butyl Acetate (123-86-4)

There are no viable alternatives to n-Butyl Acetate as a component in solvent-based wood coatings systems. Any reduction in the use of solvent-based wood coatings system will be based on customer acceptance of water-based coatings for both quality and cost. No specific plan for n-butyl acetate has been implemented.

Xylene (all isomers) (1330-20-7)

No alternatives to xylene. Purchased alkyd resins contain xylene as their principle solvent. Any reductions in the use of xylene would be contingent on customer acceptance of water-based coatings to replace solvent-based catalyzed alkyds. No specific plan for xylene has been implemented.

Ethyl Acetate (141-78-6)

Ethyl Acetate is an excellent solvent in solvent-based coatings. Evaporation rate and solvency make this an ideal solvent for air dry products. Any reduction in use would be dictated by customer acceptance of water-based coatings as an alternative to solvent-based coatings. No specific plan for ethyl acetate has been implemented.

Ethanol (64-17-5)

Ethanol is the solvent of choice for replacing methanol in non-grain raising stains for safety reasons. Ethanol may also be used as a co-solvent in water-based coatings. No specific plan for ethanol has been implemented.

Methanol (67-56-1)

Reduction in the use of methanol will be achieved by
(1) replacement of methanol by the less toxic ethanol in Non-Grain Raising stains
(2) General replacement of solvent based coatings by water based coatings

	Used (tonnes/yr)	Created (tonnes/yr)	C.I.P. (tonnes/yr)	On site releases (tonnes/yr)			Disposal/recycle (tonnes/yr)	
				Air	Water	Land	On-site	Off-site
Baseline	100 - 1000	0	100 -1000	1.4	0	0	0	0.3
Estimated reduced total	100 - 1000	0	100 - 1000	1.2	0	0	0	0.3
Reduction	10 - 100	0	10 - 100	0.2	0	0	0	0

Isopropyl Alcohol (67-63-0)

Isopropanol is used in both solvent-based and water-based coatings. An increase in production of water-based coatings and a decrease in production of solvent-based coatings may not change the amount of isopropanol used. No specific plan for isopropyl alcohol has been implemented.

Methyl Ethyl Ketone (78-93-3)

- (1) Partially replace the solvent-based products that use MEK with water-based alternatives
- (2) Partially replace MEK with non-toxic alternatives, primarily acetone, which is no classified as a VOC.

	Used (tonnes/yr)	Created (tonnes/yr)	C.I.P. (tonnes/yr)	On site releases (tonnes/yr)			Disposal/recycle (tonnes/yr)	
				Air	Water	Land	On-site	Off-site
Baseline	100 - 1000	0	100 - 1000	4.5	0	0	0	20.8
Estimated reduced total	100 - 100	0	100 - 1000	4.2	0	0	0	20.8
Reduction	10 - 100	0	100 - 1000	0.3	0	0	0	0

Certification by highest ranking employee:

As of June 1st 2018, I certify that I have read the toxic substance reduction plan for the substances listed below and I am familiar with its contents, and to my knowledge the information contained herein is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 made under that Act.

Toxic Substances:

Methanol
Toluene
Xylene (all isomers)
Ethylbenzene
2-Butoxyethanol
Isobutanol
Isopropanol
Methyl Ethyl Ketone
Methyl Isobutyl Ketone
Acetone
N-Butyl Acetate
Ethyl Acetate
Ethanol
PM10
PM2.5



June 1st 2018

Mike Sullivan
Site Manager, Cornwall Facility

Date:

Certification by licensed planner:

As of June 1st 2018, I certify that I have read the toxic substance reduction plan for the substances listed below and I am familiar with its contents, and to my knowledge the information contained herein is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 made under that Act.

Toxic Substances:

Methanol
Toluene
Xylene (all isomers)
Ethylbenzene
2-Butoxyethanol
Isobutanol
Isopropanol
Methyl Ethyl Ketone
Methyl Isobutyl Ketone
Acetone
N-Butyl Acetate
Ethyl Acetate
Ethanol
PM10
PM2.5



June 1st 2018

Mike Livermore
HSE Consultant
(TSRP0136)

Date: