

As of May 29, 2018, I, Jean-Francois Leclerc, certify that I have read the report on the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the information contained in the report is factually accurate and the report complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

isopropyl alcohol
toluene
xylenes (mixed isomers)
heavy aromatic solvent naptha
light aromatic solvent naptha
ethylene glycol butyl ether
propylene glycol methyl ether acetate
methyl ethyl ketone



Jean-Francois Leclerc
President

National Pollutant Release Inventory (NPRI) and Partners



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Report Preview

Report Details

Report Year	2017
Report Type:	NPRI,ON MOE TRA,ON MOE
Report Status:	Ready to Submit
Modified Date/Time:	30/04/2018 4:26 PM

Company and Facility Details

Company Name:	Great Pacific Enterprises LP
Business Number:	863579827
Mailing Address:	Delivery Mode: GeneralDelivery Address Line 1: 1600 West Hastings Street City, Province/Territory, Postal Code: Vancouver BritishColumbia V6E 2H2 Country: Canada
Facility Name:	Montebello Packaging, A Division of Great Pacific Enterprises LP
NAICS Code:	331317
NPRI ID:	7063
ON Reg 127/01 ID:	6012
Physical Address:	Address Line 1: 1036 Aberdeen Street City, Province/Territory, Postal Code: Hawkesbury Ontario K6A1K5 Country: Canada Latitude: 45.6047 Longitude: -74.5957 UTM Zone: 17 UTM Easting: 531517 UTM Northing: 5050231

Parent Companies

Company Name:	Great Pacific Enterprises LP
Business Number:	863579827
Mailing Address:	Delivery Mode: GeneralDelivery Address Line 1: 1600 West Hastings Street City, Province/Territory, Postal Code: Vancouver BritishColumbia V6E2H2 Country: Canada

Contacts Details

Contact Type	Technical Contact, Contractor Contact, Person who prepared the report
Name:	Wendy Nadan
Position:	Principal
Telephone:	5199404724

Email: wendy@nadanconsulting.com

Independent contractor/consultant company name: Nadan Consulting Ltd

Contact Type: Certifying Official, Highest Ranking Employee

Name: Jean-Francois Leclerc

Position: President

Telephone: 6136327096

Extension: 1143

Fax: 6136329638

Email: jfleclerc@montebellopkg.com

Contact Type: Company Coordinator, Person who coordinated the preparation of the Toxics Reduction Plan, Public Contact

Name: Jean Blondin

Position: Purchasing Manager

Telephone: 6136327096

Extension: 117

Fax: 6136329638

Email: jblondin@montebellopkg.com

General Information

Number of employees: 89

Activities for Which the 20,000-Hour Employee Threshold Does Not Apply: None of the above

Activities Relevant to Reporting Dioxins, Furans and Hexacholorobenzene: None of the above

Activities Relevant to Reporting of Polycyclic Aromatic Hydrocarbons (PAHs): Wood preservation using creosote: No

Is this the first time the facility is reporting to the NPRI (under current or past ownership): No

Is the facility controlled by another Canadian company or companies: Yes

Did the facility report under other environmental regulations or permits: No

Is the facility required to report one or more NPRI Part 4 substances (Criteria Air Contaminants): Yes

Was the facility shut down for more than one week during the year: Yes

Operating Schedule - Days of the Week: Mon, Tue, Wed, Thu, Fri

Usual Number of Operating Hours per day: 24

Usual Daily Start Time (24h) (hh:mm): 00:00

Shutdown Periods:

From 2017-07-16 To 2017-07-31

From 2017-12-24 To 2017-12-31

Substance List

CAS RN	Substance Name	Releases	Releases (Speciated VOCs)	Disposals	Recycling	Unit
67-64-1	Acetone	14.0920	N/A	N/A	N/A	tonnes

CAS RN	Substance Name	Releases	Releases (Speciated VOCs)	Disposals	Recycling	Unit
NA - M16	Volatile Organic Compounds (VOCs)	21.5730	14.5520	N/A	N/A	tonnes

Applicable Programs

CAS RN	Substance Name	NPRI	ON MOE TRA	ON MOE Reg 127/01	First report for this substance to the ON MOE TRA
67-64-1	Acetone		Yes	Yes	No
NA - M16	Volatile Organic Compounds (VOCs)	Yes	Yes		No

TRA Exit Record

CAS RN	Substance Name	Circumstance(s) that apply	Describe the circumstances that lead to the criteria no longer being met	Describe the information and any quantifications relied upon for making the determination
64742-95-6	Light aromatic solvent naphtha	The substance did not meet the criteria to provide information to NPRI	usage dropped	usage dropped

General Information about the Substance - Releases and Transfers of the Substance

CAS RN	Substance Name	Was the substance released on-site	The substance will be reported as the sum of releases to all media (total of 1 tonne or less)	1 tonne or more of a Part 5 Substance (Speciated VOC) was released to air
NA - M16	Volatile Organic Compounds (VOCs)		No	Yes

General Information about the Substance - Disposals and Off-site Transfers for Recycling

CAS RN	Substance Name	Was the substance disposed of (on-site or off-site), or transferred for treatment prior to final disposal	Is the facility required to report on disposals of tailings and waste rock for the selected reporting period	Was the substance transferred off-site for recycling
NA - M16	Volatile Organic Compounds (VOCs)			

General Information about the Substance - Nature of Activities

CAS RN	Substance Name	Manufacture the Substance	Process the Substance	Otherwise Use of the Substance
NA - M16	Volatile Organic Compounds (VOCs)			

TRA Quantifications

CAS RN	Substance Name	Use, Creation, Contained in Product	Quantity	Use ranges for public reporting
67-64-1	Acetone	Use	15.226 tonnes	No
67-64-1	Acetone	Creation	0 tonnes	No
67-64-1	Acetone	Contained in Product		
NA - M16	Volatile Organic Compounds (VOCs)	Use	26.610 tonnes	No
NA - M16	Volatile Organic Compounds (VOCs)	Creation	0 tonnes	No
NA - M16	Volatile Organic Compounds (VOCs)	Contained in Product		

TRA Quantifications - VOC Breakdown List

CAS RN	Substance Name	Use, Creation, Contained in Product	Quantity
111-76-2	2-Butoxyethanol	Use	2.498 tonnes
111-76-2	2-Butoxyethanol	Creation	0 tonnes
64742-94-5	Heavy aromatic solvent naphtha	Use	3.979 tonnes
64742-94-5	Heavy aromatic solvent naphtha	Creation	0 tonnes
67-63-0	Isopropyl alcohol	Use	1.403 tonnes
67-63-0	Isopropyl alcohol	Creation	0 tonnes
64742-95-6	Light aromatic solvent naphtha	Use	0.903 tonnes
64742-95-6	Light aromatic solvent naphtha	Creation	0 tonnes
78-93-3	Methyl ethyl ketone	Use	2.551 tonnes
78-93-3	Methyl ethyl ketone	Creation	0 tonnes
108-65-6	Propylene glycol methyl ether acetate	Use	1.368 tonnes
108-65-6	Propylene glycol methyl ether acetate	Creation	0 tonnes
108-88-3	Toluene	Use	1.634 tonnes
108-88-3	Toluene	Creation	0 tonnes
1330-20-7	Xylene (all isomers)	Use	2.406 tonnes
1330-20-7	Xylene (all isomers)	Creation	0 tonnes

TRA Quantifications - Total Speciated VOCs

Use, Creation, Contained in Product	Quantity
Use	16.742 tonnes
Creation	0 tonnes

TRA Quantifications - Others

CAS RN	Substance Name	Change in Method of Quantification	Reasons for Change	Description of how the change impact tracking and quantification of the substance	Description of how an incident(s) affected quantifications	Significant Process Change
67-64-1	Acetone					No
NA - M16	Volatile Organic Compounds (VOCs)					No

On-site Releases - Releases to air

CAS RN	Substance Name	Category	Basis of Estimate	Detail Code	Quantity
67-64-1	Acetone	Fugitive Releases	C - Mass Balance		14.092 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	Stack or Point Releases	C - Mass Balance		18.29 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	Fugitive Releases	C - Mass Balance		3.283 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	Other Sources - Speciated VOCs	NA - Not Applicable		21.573 tonnes

On-site Releases - Releases to air - Total

CAS RN	Substance Name	Total - Releases to Air
67-64-1	Acetone	14.092 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	21.573 tonnes

On-site Releases - Releases to air - VOC Breakdown List

Category	CAS RN	Substance Name	Quantity
Other Sources - Speciated VOCs	111-76-2	2-Butoxyethanol	2.47 tonnes
Other Sources - Speciated VOCs	64742-94-5	Heavy aromatic solvent naphtha	3.954 tonnes
Other Sources - Speciated VOCs	67-63-0	Isopropyl alcohol	1.075 tonnes
Other Sources - Speciated VOCs	78-93-3	Methyl ethyl ketone	1.827 tonnes
Other Sources - Speciated VOCs	108-65-6	Propylene glycol methyl ether acetate	1.312 tonnes
Other Sources - Speciated VOCs	108-88-3	Toluene	1.634 tonnes
Other Sources - Speciated VOCs	1330-20-7	Xylene (all isomers)	2.28 tonnes

On-site Releases - Monthly Breakdown of Annual Releases

CAS RN	Substance Name	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
NA - M16	Volatile Organic Compounds (VOCs)	8.33	8.33	8.34	8.33	8.33	8.34	8.33	8.33	8.34	8.33	8.33	8.34

On-site Releases - Reasons for Changes in Quantities Released from Previous Year

CAS RN	Substance Name	Reasons for Changes in Quantities from Previous Year	Comments
NA - M16	Volatile Organic Compounds (VOCs)	No significant change (i.e. < 10%) or no change	

Comparison Report - Enters, Creation, Contained in Product

CAS RN	Substance Name	Is Breakdown	Category	Quantity	Last Reported Quantity	Reporting Period of Last Reported Quantity	Change	% Change
111-76-2	2-Butoxyethanol	Yes	Enters the facility (Use)	2.498 tonnes	2.439 tonnes	2016	0.059	2.42
111-76-2	2-Butoxyethanol	Yes	Creation	0 tonnes	0 tonnes	2016	0	
67-64-1	Acetone	No	Enters the facility (Use)	15.226 tonnes	13.44 tonnes	2016	1.786	13.29
67-64-1	Acetone	No	Creation	0 tonnes	0 tonnes	2016	0	
64742-94-5	Heavy aromatic solvent naphtha	Yes	Enters the facility (Use)	3.979 tonnes	5.703 tonnes	2016	-1.724	-30.23
64742-94-5	Heavy aromatic solvent naphtha	Yes	Creation	0 tonnes	0 tonnes	2016	0	
67-63-0	Isopropyl alcohol	Yes	Enters the facility (Use)	1.403 tonnes	1.069 tonnes	2016	0.334	31.24
67-63-0	Isopropyl alcohol	Yes	Creation	0 tonnes	0 tonnes	2016	0	

CAS RN	Substance Name	Is Breakdown	Category	Quantity	Last Reported Quantity	Reporting Period of Last Reported Quantity	Change	% Change
64742-95-6	Light aromatic solvent naphtha	Yes	Enters the facility (Use)	0.903 tonnes	1.009 tonnes	2016	-0.106	-10.51
64742-95-6	Light aromatic solvent naphtha	Yes	Creation	0 tonnes	0 tonnes	2016	0	
78-93-3	Methyl ethyl ketone	Yes	Enters the facility (Use)	2.551 tonnes	1.602 tonnes	2016	0.949	59.24
78-93-3	Methyl ethyl ketone	Yes	Creation	0 tonnes	0 tonnes	2016	0	
108-65-6	Propylene glycol methyl ether acetate	Yes	Enters the facility (Use)	1.368 tonnes	1.646 tonnes	2016	-0.278	-16.89
108-65-6	Propylene glycol methyl ether acetate	Yes	Creation	0 tonnes	0 tonnes	2016	0	
108-88-3	Toluene	Yes	Enters the facility (Use)	1.634 tonnes	2.172 tonnes	2016	-0.538	-24.77
108-88-3	Toluene	Yes	Creation	0 tonnes	0 tonnes	2016	0	
1330-20-7	Xylene (all isomers)	Yes	Enters the facility (Use)	2.406 tonnes	2.233 tonnes	2016	0.173	7.75
1330-20-7	Xylene (all isomers)	Yes	Creation	0 tonnes	0 tonnes	2016	0	

Comparison Report - Enters, Creation, Contained in Product : Reason(s) for Change

CAS RN	Substance Name	Reason(s) for Change	Other Reason
67-64-1	Acetone	No reasons - quantities approximately the same	
NA - M16	Volatile Organic Compounds (VOCs)	No reasons - quantities approximately the same	

Comparison Report - On-site Releases

CAS RN	Substance Name	Is Breakdown	Category	Quantity	Last Reported Quantity	Reporting Period of Last Reported Quantity	Change	% Change
111-76-2	2-Butoxyethanol	Yes	Total Releases to Air	2.47 tonnes	2.439 tonnes	2016	0.031	1.27
67-64-1	Acetone	No	Total Releases to Air	14.092 tonnes	11.983 tonnes	2016	2.109	17.60
67-64-1	Acetone	No	Total Releases to Water	0 tonnes	0 tonnes	2016	0	
67-64-1	Acetone	No	Total Releases to Land	0 tonnes	0 tonnes	2016	0	
67-64-1	Acetone	No	Total Releases to All Media	0 tonnes	0 tonnes	2016	0	
64742-94-5	Heavy aromatic solvent naphtha	Yes	Total Releases to Air	3.954 tonnes	5.703 tonnes	2016	-1.749	-30.67
67-63-0	Isopropyl alcohol	Yes	Total Releases to Air	1.075 tonnes	1.079 tonnes	2016	-0.004	-0.37
78-93-3	Methyl ethyl ketone	Yes	Total Releases to Air	1.827 tonnes	1.602 tonnes	2016	0.225	14.04
108-65-6	Propylene glycol methyl ether acetate	Yes	Total Releases to Air	1.312 tonnes	1.646 tonnes	2016	-0.334	-20.29
108-88-3	Toluene	Yes	Total Releases to Air	1.634 tonnes	2.172 tonnes	2016	-0.538	-24.77
1330-20-7	Xylene (all isomers)	Yes	Total Releases to Air	2.28 tonnes	2.233 tonnes	2016	0.047	2.10

Comparison Report - On-site Releases - Reason(s) for Change

CAS RN	Substance Name	Reason(s) for Change	Other Reason
67-64-1	Acetone	No reasons - quantities approximately the same	
NA - M16	Volatile Organic Compounds (VOCs)	No reasons - quantities approximately the same	

Comparison Report - Disposals On-site, Off-site and Tailings and Waste Rock

CAS RN	Substance Name	Is Breakdown	Category	Quantity	Last Reported Quantity	Reporting Period of Last Reported Quantity	Change	% Change
67-64-1	Acetone	No	Total On-site Disposals	0 tonnes	0 tonnes	2016	0	
67-64-1	Acetone	No	Total Off-site Disposals	0 tonnes	0 tonnes	2016	0	
67-64-1	Acetone	No	Total Off-site transfer for treatment Prior to Final Disposal	0 tonnes	0 tonnes	2016	0	
67-64-1	Acetone	No	Total On-site Disposal of Tailings and Waste Rock	0 tonnes	0 tonnes	2016	0	
67-64-1	Acetone	No	Total Off-site Disposal of Tailings and Waste Rock	0 tonnes	0 tonnes	2016	0	

Comparison Report - Disposals On-site, Off-site and Tailings and Waste Rock - Reason(s) for Change

CAS RN	Substance Name	Reason(s) for Change	Other Reason
67-64-1	Acetone	No reasons - quantities approximately the same	

Pollution Prevention

Does the facility have a documented pollution prevention plan?

Yes

a) Please check all that apply

Plan was prepared or implemented for another government jurisdiction (i.e. other Federal government department, province, municipality). Specify name in comments field below.

b) Did the facility update their plan in the current reporting year?

No

c) Does the plan address substances, energy conservation, or water conservation?

Substances (provide the name of the primary Substances in the comments field below)

Please summarize your pollution prevention plan. If you selected "Substances", please specify the substances that were addressed in your plan (this information will be publicly available).

toxics reduction plan

Did the facility complete any pollution prevention activities in the current NPRI reporting year

No

Progress on TRA Plan - Objectives

CAS RN	Substance Name	Objectives
111-76-2	2-Butoxyethanol	none
67-64-1	Acetone	Montebello Packaging has prepared this toxic substance reduction plan for acetone to investigate options to reduce the usage while supplying customers with products that meet their needs. Employees will be trained to use the minimum quantity of solvent necessary for cleaning and to keep all containers closed.
64742-94-5	Heavy aromatic solvent naphtha	Montebello Packaging has prepared this toxic substance reduction plan for MEK, isopropyl alcohol and heavy aromatic solvent naphtha to investigate options to reduce the usage of VOCs while supplying customers with products that meet their needs. Employees will be trained to use the minimum quantity of solvent necessary for cleaning and to keep all containers closed.
67-63-0	Isopropyl alcohol	Montebello Packaging has prepared this toxic substance reduction plan for MEK, isopropyl alcohol and heavy aromatic solvent naphtha to investigate options to reduce the usage of VOCs while supplying customers with products that meet their needs. Employees will be trained to use the minimum quantity of solvent necessary for cleaning and to keep all containers closed.
78-93-3	Methyl ethyl ketone	Montebello Packaging has prepared this toxic substance reduction plan for MEK, isopropyl alcohol and heavy aromatic solvent naphtha to investigate options to reduce the usage of VOCs while supplying customers with products that meet their needs. Employees will be trained to use the minimum quantity of solvent necessary for cleaning and to keep all containers closed.
108-65-6	Propylene glycol methyl ether acetate	none
108-88-3	Toluene	none
1330-20-7	Xylene (all isomers)	none

Progress on TRA Plan - Use Targets

CAS RN	Substance Name	Quantity	Years	Description of Target
111-76-2	2-Butoxyethanol	No quantity target	No timeline target	
67-64-1	Acetone	No quantity target	No timeline target	
64742-94-5	Heavy aromatic solvent naphtha	No quantity target	No timeline target	
67-63-0	Isopropyl alcohol	No quantity target	No timeline target	
78-93-3	Methyl ethyl ketone	No quantity target	No timeline target	
108-65-6	Propylene glycol methyl ether acetate	No quantity target	No timeline target	
108-88-3	Toluene	No quantity target	No timeline target	
1330-20-7	Xylene (all isomers)	No quantity target	No timeline target	

Progress on TRA Plan - Creation Targets

CAS RN	Substance Name	Quantity	Years	Description of Target
111-76-2	2-Butoxyethanol	No quantity target	No timeline target	
67-64-1	Acetone	No quantity target	No timeline target	
64742-94-5	Heavy aromatic solvent naphtha	No quantity target	No timeline target	
67-63-0	Isopropyl alcohol	No quantity target	No timeline target	
78-93-3	Methyl ethyl ketone	No quantity target	No timeline target	
108-65-6	Propylene glycol methyl ether acetate	No quantity target	No timeline target	
108-88-3	Toluene	No quantity target	No timeline target	
1330-20-7	Xylene (all isomers)	No quantity target	No timeline target	

Progress on TRA Plan - Toxic Reduction Options Implemented

CAS RN	Substance Name	Activity	Steps that were taken in the reporting period to implement the toxic reduction option	Public summary of the description of the steps	Comparison of the steps that were described in the plan for implementation with the actual steps taken during the reporting period	Public summary of the comparison of the steps
67-64-1	Acetone	Training related to toxics substance reduction	none	none	none	none
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	none	none	none	none
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	none	none	none	none
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	none	none	none	none

CAS RN	Substance Name	Activity	Will the timelines in the current version of the plan will be met	Comments:
67-64-1	Acetone	Training related to toxics substance reduction	Yes	
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	Yes	
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	Yes	
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	Yes	

Progress on TRA Plan - Reductions due to Options Implemented - Good operator practice or training

CAS RN	Substance Name	Activity	Reductions due to Options Implemented	Quantity
67-64-1	Acetone	Training related to toxics substance reduction	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
67-64-1	Acetone	Training related to toxics substance reduction	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
67-64-1	Acetone	Training related to toxics substance reduction	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the steps described:	No Amount
67-64-1	Acetone	Training related to toxics substance reduction	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
67-64-1	Acetone	Training related to toxics substance reduction	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
67-64-1	Acetone	Training related to toxics substance reduction	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to steps described:	No Amount
67-64-1	Acetone	Training related to toxics substance reduction	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
67-64-1	Acetone	Training related to toxics substance reduction	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
67-64-1	Acetone	Training related to toxics substance reduction	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount

CAS RN	Substance Name	Activity	Reductions due to Options Implemented	Quantity
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to steps described:	No Amount
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-94-5	Heavy aromatic solvent naphtha	Training related to toxics substance reduction	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the steps described:	No Amount
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the steps described:	No Amount
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to steps described:	No Amount
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
67-63-0	Isopropyl alcohol	Training related to toxics substance reduction	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the steps described:	No Amount
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the steps described:	No Amount
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to steps described:	No Amount
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
78-93-3	Methyl ethyl ketone	Training related to toxics substance reduction	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the steps described:	No Amount

Progress on TRA Plan - Additional Actions

CAS RN	Substance Name	Were there any additional actions outside the plan taken during the reporting period to reduce the use and/or creation of the substance?	Describe any additional actions that were taken during the reporting period to achieve the plan's objectives	Provide a public summary of the description of the additional action taken
111-76-2	2-Butoxyethanol	No		
67-64-1	Acetone	No		
64742-94-5	Heavy aromatic solvent naphtha	No		
67-63-0	Isopropyl alcohol	No		

CAS RN	Substance Name	Were there any additional actions outside the plan taken during the reporting period to reduce the use and/or creation of the substance?	Describe any additional actions that were taken during the reporting period to achieve the plan's objectives	Provide a public summary of the description of the additional action taken
78-93-3	Methyl ethyl ketone	No		
108-65-6	Propylene glycol methyl ether acetate	No		
108-88-3	Toluene	No		
1330-20-7	Xylene (all isomers)	No		

Progress on TRA Plan - Reductions due to additional actions taken

CAS RN	Substance Name	Reductions due to additional actions taken	Quantity
111-76-2	2-Butoxyethanol	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions.	
111-76-2	2-Butoxyethanol	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions.	
111-76-2	2-Butoxyethanol	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions.	
111-76-2	2-Butoxyethanol	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the additional actions.	
111-76-2	2-Butoxyethanol	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the additional actions.	
111-76-2	2-Butoxyethanol	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions.	
111-76-2	2-Butoxyethanol	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
111-76-2	2-Butoxyethanol	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
111-76-2	2-Butoxyethanol	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions.	
67-64-1	Acetone	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions.	
67-64-1	Acetone	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions.	
67-64-1	Acetone	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions.	
67-64-1	Acetone	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the additional actions.	
67-64-1	Acetone	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the additional actions.	
67-64-1	Acetone	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions.	
67-64-1	Acetone	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
67-64-1	Acetone	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
67-64-1	Acetone	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions.	
64742-94-5	Heavy aromatic solvent naphtha	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions.	
64742-94-5	Heavy aromatic solvent naphtha	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions.	
64742-94-5	Heavy aromatic solvent naphtha	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions.	
64742-94-5	Heavy aromatic solvent naphtha	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the additional actions.	
64742-94-5	Heavy aromatic solvent naphtha	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the additional actions.	
64742-94-5	Heavy aromatic solvent naphtha	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions.	
64742-94-5	Heavy aromatic solvent naphtha	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
64742-94-5	Heavy aromatic solvent naphtha	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
64742-94-5	Heavy aromatic solvent naphtha	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions.	
67-63-0	Isopropyl alcohol	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions.	
67-63-0	Isopropyl alcohol	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions.	
67-63-0	Isopropyl alcohol	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions.	

CAS RN	Substance Name	Reductions due to additional actions taken	Quantity
1330-20-7	Xylene (all isomers)	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions.	
1330-20-7	Xylene (all isomers)	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
1330-20-7	Xylene (all isomers)	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
1330-20-7	Xylene (all isomers)	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions.	

Progress on TRA Plan - Amendments

CAS RN	Substance Name	Were any amendments made to the toxic substance reduction plan during the reporting period	Description any amendments that were made to the toxic substance reduction plan during the reporting period	Provide a public summary of the description of any amendments that were made to the toxic substance reduction plan during the reporting period
111-76-2	2-Butoxyethanol	No		
67-64-1	Acetone	No		
64742-94-5	Heavy aromatic solvent naphtha	No		
67-63-0	Isopropyl alcohol	No		
78-93-3	Methyl ethyl ketone	No		
108-65-6	Propylene glycol methyl ether acetate	No		
108-88-3	Toluene	No		
1330-20-7	Xylene (all isomers)	No		

Empty

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