

**Toxic Substance Reduction Plan
Hexavalent Chromium Compounds
Summary**



Toxic Substance Reduction Plan for 2011

Facility Information

Facility Name		Fleet Canada Incorporated			
Number of Full-time Employees		122			
NAICS Code					
Two Digit:	33	Four Digit:	3346	Six Digit:	334610
UTM Spatial Coordinates					
UTM Spatial Coordinates		Datum			
Latitude:	42.9187	NAD83			
Longitude:	-78.9537				

Public Contact	
Name	Glenn Stansfield
Title	General Manager
Phone Number	(289) 241-1885
Fax Number	(905) 871-1808
E-mail	gstansfield@fleet.ca
Address	1011 Gilmore Road, Fort Erie, ON L2A 5N3

Plan Summary Statement

This plan summary reflects the content of the toxic substance reduction plan for hexavalent chromium compounds prepared Fleet Canada, dated January 18, 2013

Statement of Intent and Objective of the Plan

Fleet Canada Inc. intends to review the possible methods of reducing the use and discharge of hexavalent chromium and implement those, which are beneficial to the company and the community. This facility does not create the above toxic substances; therefore this plan will not address reducing their creation.

Toxic Substance Reduction Plan for 2011

Objective: Fleet Canada Inc. strives to find options to reduce the use and emissions of hexavalent chromium. Further, this plan will determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time. Our objective is to:

- reduce the use of hexavalent chromium by 1.1%
- reduce air releases by 18%
- reduce offsite transfer for recycling by 14%, and
- reduce off-site disposal by 48%.

Description of the Toxic Substance.

Hexavalent Chromium (Cr) used in two different processes; at the facility's adhesive painting and tank line processes

Toxic Substance Reduction Options to be Implemented

The following options have been identified for implementation to reduce the use and releases of hexavalent chromium compounds

- Employee training, and revising standard operating practices in reducing drag out in spray rinsing process and fully draining of the containers associated with the operation of the anodizing process;
- Employee training, and revising standard operating practices in paint mixing and spray painting processes
- Revising inventory and procurement policy for the parts to be purchased in a smaller container aiming at reducing the quantity of off-spec parts transferred for treatment
- Equipment or process modifications for replacing the existing spray guns with air assisted airless HVLP guns designed with higher transfer efficiency. This will result in reduced paint usage lost in overspray.

Estimate of Reduction of Hexavalent Chromium by the Implementation of All Options

Type	Estimated Reductions in kg	Estimated Reductions in %
Use	16.61 kg	1.1%
Release to Air	0.48kg	~18%
Off-site Disposal	15.4kg	~48%
Transfer Off-site for recycling	2.31kg	~14%


Planner Recommendations and Rationale

The planner's recommendations and rationale for those recommendations are appended to the plan.

Plan Confirmation for Hexavalent Chromium

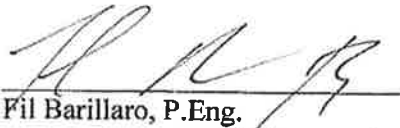
As of February 12, 2013, I, Glenn Stansfield confirm that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the Plan is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 with the exclusion of the Regulatory deadline, the reason for the late submission is that the evaluation of reduction options and data equitation took longer than expected.

[Hexavalent Chromium]


Glenn Stansfield Date 22 FEB 13
President, CEO Fleet Canada Incorporated (Highest Ranking Employee)

As of February 12, 2013, I, FilBarillaro confirm that I am familiar with the processes at Fleet Canada Inc. that use or create the toxic substance 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 plan dated November 30, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act with the exclusion of the Regulatory deadline.

[Hexavalent Chromium]


Fil Barillaro, P.Eng. Date Feb 27/2013
Principal, Oakhill Environmental Consultants
Toxic Substance Reduction Planner
Certification Number: TSRP0233