

## SUPPLEMENTAL SUMMARY PLAN STATEMENT

Baycoat is required under Ontario Regulation 455/09 "Toxic Reduction Act", to develop Toxic Reduction Plans for reportable substances and to make summaries of these plans available. The Toxic Reduction Plans are updated on a 5 year basis to reflect current operations, new or modified reduction options and other changes which may have occurred at the facility.

Readers are cautioned that the following Toxic Reduction Plan Summary is shown as it existed on the Date of Certification and as such may not fully reflect the current conditions at Baycoat, which will be incorporated in the next Toxic Reduction Plan update. Similarly, reduction options listed in the Toxic Reduction Plan Summary may not reflect changes that occurred during the implementation stage for some options and will be addressed in future updates.

Sincerely,

A handwritten signature in black ink, appearing to read "Brown", is written over a horizontal line. The signature is stylized and cursive.

February 28, 2018

Graham Brown  
General Manager, Baycoat

## TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

|  |  |
|--|--|
| Substance Name and CAS #   | 1,2,4 Trimethyl Benzene (95-63-6)<br>2-butoxyethanol (111-76-2)<br>Solvent Naphtha Light (64742-95-6)<br>Butyl Carbitol Solvent (112-34-5)<br>Medium Aromatic Naphtha (64742-94-5) |
| <b>Facility Identification and Site Address</b>                          |  |
| Legal Company Name:  | Dofasco Inc., Stelco Inc.  |
| Facility Name:   | Baycoat  |
| Facility Address:  | 244 Lanark St., Hamilton, ON L8N 3K7   |
| Spatial Coordinates of Facility:   | 43.24280E -79.75030N NAD82   |
| Number of Full-time Employees:   | 155  |
| Facility NPRI ID:  | 15   |
| Ontario MOECC ID Number (if assigned):                                   |  |
| 2 Digit NAICS Code:  | 33   |
| 4 Digit NAICS Code:  | 3328   |
| 6 Digit NAICS Code:  | 332810   |
| <b>Parent Company Information</b>  |  |
| Name of Parent Company:  | ArcelorMittal Dofasco  |
| Address of Parent Company:   | 1330 Burlington St. E. Hamilton, ON L8N 3J5  |
| Percentage Ownership of Facility:  | 50%  |
| Name of Parent Company:  | US Steel Canada  |
| Address of Parent Company:   | 100 King St. W. Hamilton, ON L8N 3T1   |
| Percentage Ownership of Facility:  | 50%  |
| <b>Company Contact Information</b>                                       |  |
| Public Contact Name:   | Graham Brown   |
| Position / Title:  | President and General Manager  |
| Telephone:   | 905-561-0965   |
| <b>Substances for Which Other Plans Have Been Prepared (Name, CAS #)</b> |  |
| Chromium (NA-04)   | Toluene (108-88-3)   |
| Nickel (NA-11)   | Ethylbenzene (100-41-4)  |
| Zinc (NA-14)   | Naphthalene (91-20-3)  |
| Xylene (1330-20-7)   | Methyl Isobutyl Ketone (108-10-1)  |
| Methanol (67-56-1)   | Methyl ethyl Ketone (78-93-3)  |
| Isopropyl Alcohol (67-63-0)  | Nitrogen Oxides (11104-93-1)   |

## PLAN SUMMARY STATEMENT

This plan summary accurately reflects the content of the toxic substance reduction plan for:

- 1,2,4 Trimethyl Benzene (95-63-6)
- 2-butoxyethanol (111-76-2)
- Solvent Naphtha Light (64742-95-6)
- Butyl Carbitol Solvent (112-34-5)
- Medium Aromatic Naphtha (64742-94-5)

- **TOXIC REDUCTION POLICY STATEMENT OF INTENT: 1,2,4 TRIMETHYL BENZENE (95-63-6)**

1,2,4 Trimethyl Benzene is currently used by Baycoat in the coating process. Baycoat does not intend to reduce the use of 1,2,4 Trimethyl Benzene, as no technical and economic options were identified. Baycoat will continue to look for options in the future that would reduce the use of this toxic substance.

### REDUCTION OBJECTIVES

Baycoat will look for options to reduce the use of the 1,2,4 Trimethyl Benzene at the facility. 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.

### TOXIC SUBSTANCE REDUCTION OPETION(S) TO BE IMPLEMENTED

There are no target reductions for this substance.

### DESCRIPTION OF SUBSTANCE

1,2,4 Trimethyl Benzene is a surface coating organic.

- **TOXIC REDUCTION POLICY STATEMENT OF INTENT: 2-BUTOXYETHANOL (111-76-2)**

2-butoxyethanol is currently used by Baycoat in the coating process and as a paint reducing solvent as required. Baycoat does not intend to reduce the use of 2-butoxyethanol, as no technical and economic options were identified. Baycoat will continue to look for options in the future that would reduce the use of this toxic substance.

### REDUCTION OBJECTIVES

Baycoat will look for options to reduce the use of the 2-butoxyethanol at the facility. 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.

### TOXIC SUBSTANCE REDUCTION OPETION(S) TO BE IMPLEMENTED

There are no target reductions for this substance.

### DESCRIPTION OF SUBSTANCE

2-butoxyethanol is a surface coating organic and reducing solvent.

- **TOXIC REDUCTION POLICY STATEMENT OF INTENT: SOLVENT NAPHTHA LIGHT (64742-95-6)**

Solvent Naphtha Light is currently used by Baycoat in the coating process and as a paint reducing solvent as required. Solvent Naphtha Light is also a component of a wash solvent blend, but this is a very small percentage (less than 4%) of the total solvent. Baycoat intends to reduce the use of Solvent Naphtha Light by reducing the use of wash solvent for cleaning and line purging functions. Baycoat intends to make a reasonable effort to further reduce the use of this toxic substance at the facility if options should be identified in the future.

#### **REDUCTION OBJECTIVES**

Baycoat will look for options to reduce the use of the Solvent Naphtha Light at the facility. 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.

#### **TOXIC SUBSTANCE REDUCTION OPETION(S) TO BE IMPLEMENTED**

The target reduction is 10% of wash solvent usage, with an overall reduction of 0.4% of total usage.

#### **DESCRIPTION OF SUBSTANCE**

Solvent Naphtha Light is a surface coating organic and reducing solvent.

- **TOXIC REDUCTION POLICY STATEMENT OF INTENT: BUTYL CARBITOL SOLVENT (112-34-5)**

Butyl Carbitol Solvent is currently used by Baycoat in the coating process. Baycoat does not intend to reduce the use of Butyl Carbitol solvent, as no technical and economic options were identified. Baycoat will continue to look for options in the future that would reduce the use of this toxic substance.

#### **REDUCTION OBJECTIVES**

Baycoat will look for options to reduce the use of the Butyl Carbitol Solvent at the facility. 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.

#### **TOXIC SUBSTANCE REDUCTION OPETION(S) TO BE IMPLEMENTED**

There are no target reductions for this substance.

#### **DESCRIPTION OF SUBSTANCE**

Butyl Carbitol Solvent is a surface coating organic.

- **TOXIC REDUCTION POLICY STATEMENT OF INTENT: MEDIUM AROMATIC NAPHTHA (64742-94-5)**

Medium Aromatic Naphtha is currently used by Baycoat in the coating process and as a paint reducing solvent as required. Medium Aromatic Naphtha is also a component of a wash solvent blend, but this is a very small percentage (close to 1%) of the total used. Baycoat does intend to reduce the use of Medium Aromatic Naphtha by reducing the use of wash solvent for cleaning and line purging functions. Baycoat will continue to look for options in the future that would reduce the use of this toxic substance.

## REDUCTION OBJECTIVES

Baycoat will look for options to reduce the use of the Medium Aromatic Naphtha at the facility. 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.

## TOXIC SUBSTANCE REDUCTION OPTION(S) TO BE IMPLEMENTED

The target reduction is 10% of wash solvent usage, with an overall reduction of 0.1% of total usage.

## DESCRIPTION OF SUBSTANCE

Medium Aromatic Naphtha is a surface coating organic and reducing solvent.

## REDUCTION OBJECTIVES

Baycoat will strive to reduce the creation of nitrogen oxides during natural gas combustion at the facility. 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.

## TOXIC SUBSTANCE REDUCTION OPTION(S) TO BE IMPLEMENTED

The following technically and economically feasible options have been identified for implementation to reduce the use of Medium Aromatic Naphtha and Solvent Naphtha Light by:

- Conducting a Wash Solvent Reduction Study

The plan is to be implemented by June 30, 2017 and is expected to result in a total reduction of 10 percent in the amount of wash solvent used.

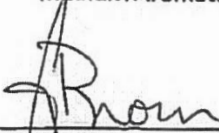
| Substances                           | Used            | Created | On-Site Releases                    |                 |       | Disposal |                 | Transferred (recycling) | Contained in product | Transformed |
|--------------------------------------|-----------------|---------|-------------------------------------|-----------------|-------|----------|-----------------|-------------------------|----------------------|-------------|
|                                      |                 |         | Air                                 | Land            | Water | On-Site  | Off-Site        |                         |                      |             |
|                                      |                 |         | Solvent Naphtha, Light (64742-95-6) | 3,040 kg or 10% |       |          |                 |                         |                      |             |
| Medium Aromatic Naphtha (64742-94-5) | 3,040 kg or 10% |         |                                     |                 |       |          | 2,591 kg or 10% |                         |                      |             |

## CERTIFICATION STATEMENTS

### 12 PLAN CERTIFICATION

As of June 16, 2016, I, GRAHAM BROWN, BAYCOAT, certify 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, with the exception of the regulatory deadline, complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

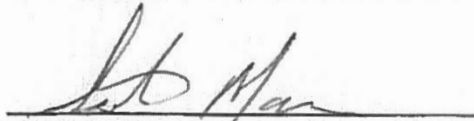
- 1,2,4 Trimethyl Benzene (95-63-6)
- 2-butoxyethanol (111-76-2)
- Solvent Naphtha Light (64742-95-6)
- Butyl Carbitol Solvent (112-34-5)
- Medium Aromatic Naphtha (64742-94-5)



Graham Brown, General Manager  
Baycoat (Highest Ranking Employee)

Date Jun 16, 2016

As of June 16, 2016, I, SCOTT MANSER, PLANNER ORTECH ENVIRONMENTAL, certify that I am familiar with the processes at Baycoat 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 June 10, 2016 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.



Scott Manser  
Toxic Substance Reduction Planner  
License No. TSRP0071

Date June 17, 2016