

## **SONOCO CANADA CORPORATION**

### **BRANTFORD OPERATIONS**

**33 PARK AVENUE EAST, BRANTFORD, ONTARIO N3S 7R9**

## **TOXICS REDUCTION ACT TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES 2013**

REPORT PREPARED BY:  
*O2E INC.*

REPORT PREPARED FOR:  
*SONOCO CANADA CORPORATION*

JULY 30, 2014

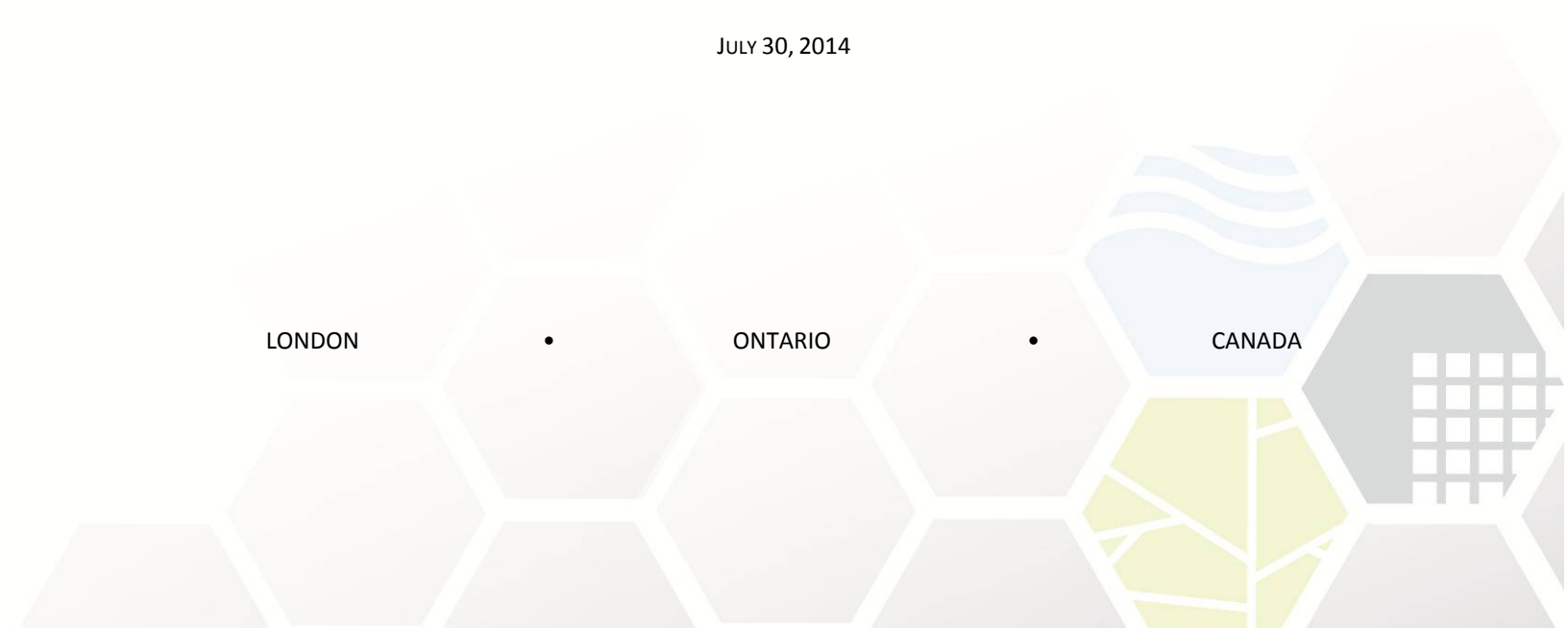
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## 1. PLAN SUMMARY – OXIDES OF NITROGEN (NO<sub>2</sub>)

Name and CASRN of Substance	Oxides of Nitrogen (NO <sub>2</sub> )	11104-93-1
Substances for which other plans have been prepared		

### 1.1 Basic Facility Information

Basic facility information has been included in Section 2 of this document.

### 1.2 Toxic Reduction Policy Statement of Intent

Climate change, resource scarcity and declining water availability are global challenges that affect us all, and Sonoco is committed to proactively responding to them in a way that's good for their customers, their employees, their business and the world.

To that end, Sonoco is shrinking the environmental footprint of their 347 manufacturing plants in 34 countries by reducing energy consumption, green house gasses and other air emissions, water usage and wastes going to landfills. In 2012 and 2013 Sonoco made great strides towards their sustainability goals. Sonoco reduced energy use by 1%, continued construction of our biomass cogeneration system in Hartsville, and recognized 31 Sonoco facilities that achieved milestones in landfill diversion and waste stream reduction through our Sonoco Star Awards program.

Toxic substance reduction is an ongoing effort at Sonoco, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

### 1.3 Reduction Objectives

The reduction of toxic substance use, creation and releases is a priority for Sonoco forming part of their sustainability programs and EMS. Sonoco's goal is to reduce the creation and release of NO<sub>x</sub> where technically and economically feasible. Based on currently available information and technologies, there are no technically and economically feasible reduction options currently available for this substance. It is important to note that NO<sub>x</sub> is generated through the combustion of fuel sources at the facility and that most current research seeks to abate these emissions using end of pipe controls.

#### **1.4 Description of Substance**

Oxides of Nitrogen are created and released as a by-product of the combustion of natural gas in the facility's turbine, water boiler and miscellaneous natural gas fired equipment. The amount of NO<sub>x</sub> created and released by the combustion of natural gas is calculated based on the amount of natural gas used by each equipment category and emission factors published by the Canadian Energy Partnership for Environmental Innovation.

#### **1.5 Toxic Substance Reduction Option to be Implemented**

There are currently no reduction options that have been identified as being both technically and economically feasible for this substance. However, Sonoco will continue to explore and investigate potential reduction options as they arise as part of their existing sustainability programs.

#### **1.6 Plan Summary Statement**

This plan accurately reflects the content of the toxic substance reduction plan for NO<sub>x</sub>, prepared on behalf of Sonoco, dated June 13, 2014.

#### **1.7 Copy of Plan Confirmation**

A copy of the plan confirmation is presented in Section 3 of this document.

## 2. BASIC FACILITY INFORMATION

<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Sonoco Canada Corporation	
<b>Facility Name</b>	Sonoco Brantford	
<b>Facility Address</b>	Physical Address:	Mailing Address
	33 Park Avenue East Brantford ON N3S 7R9	P.O. Box 1208 Brantford, Ontario N3T 5T5
<b>Spatial Coordinates (UTM)</b>	561350 (Easting)	4776000 (Northing)
<b>Datum</b>	WGS84	
<b>Number of Employees</b>	71 (Full time equivalents)	
<b>NPRI ID</b>	10193	
<b>ON MOE ID</b>	-	
<b>Parent Company Information</b>		
<b>Parent Company Name &amp; Address</b>	Sonoco Products Company 1 North Second Street Hartsville, SC 29550	
<b>Percent Ownership</b>	100%	
<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>	3221 Pulp, Paper and Paperboard Mills	
<b>6 Digit NAICS Code</b>	322130 Paperboard Mills	
<b>Company Contact Information</b>		
<b>Facility Public Contact</b>	Jim Maloney Plant Manager	Contact Address
	jim.maloney@sonoco.com	33 Park Avenue East Brantford ON N3S 7R9
	Phone: 519-752-6591	
	Fax: 519-756-2811	

### 3. COPY OF RATIONALE STATEMENT AND PLAN CONFIRMATIONS

#### Rationale Statement – Highest Ranking Employee

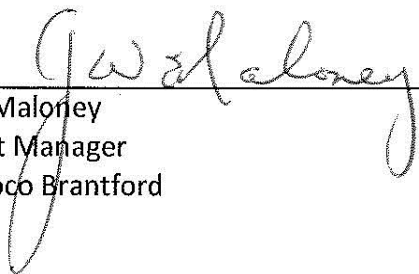
Submission of the required plan summaries and certification statements via the Environment Canada Single Window Information Manager (SWIM) system has been delayed as a result of the investigation and assessment of reduction options taking longer than anticipated to complete. Rather than compromise the integrity of the report and results by rushing the assessment to meet the deadline, we have chosen to take the time to properly evaluate all options we believe to be currently available for our operations. As such, submission of the required elements of the toxic substance reduction plans could not be made by the regulatory deadline.

#### Confirmation by the Highest Ranking Employee

As of June 13, 2014, I, Jim Maloney, 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, with the exception of the regulatory deadline, comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Oxides of Nitrogen (as NO<sub>2</sub>)

  
\_\_\_\_\_  
Jim Maloney  
Plant Manager  
Sonoco Brantford

## Confirmation by Licensed Planner

As of June 13, 2014, I, Tim Logan certify that I am familiar with the processes at Sonoco's Brantford facility 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 plans dated June 13, 2014 and that the plans, with the exception of the regulatory deadline, comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Oxides of Nitrogen (as NO<sub>2</sub>)



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Tim Logan (License No. TSRP0003)  
President  
O2E Inc. Environmental Consultants